

Submitted to the Canadian Transportation Agency (Form submission)

Subject: Consultation on proposed changes to strengthen the Air Passenger Protection Regulations

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1. Exceptional Circumstances

I feel that the proposed criteria is good in a vacuum, but fails to address the greater issue of airlines misrepresenting exceptional circumstances. This should be combined with very stiff penalties for fraud; airlines will continue to stall compensation as much as possible unless they have, for lack of a better phrase, the fear of god put in them.

Specific examples:

"Hidden manufacturing defects that come to light and affect flight safety" - can and will be used for any defect, even if it's well-known.

"Airport operational issues for which the airline is not responsible" - we have already had and still have a dispute between YVR and airlines over who was responsible for disruptions over winter. Waiting for an arbitrator to come to a decision does not help a stranded passenger.

"Labour disruptions at the airline or by essential air service providers like airport managers, air navigation personnel, or ground handlers" - I feel as though most labour disruptions (i.e. union job action) are well within an airlines' control, and should be clarified further.

5. Communications

The proposed changes could be streamlined further. I suggest a mandatory section on each boarding pass with either a shortened URL on physical copies, or a direct link for digital copies, to a web page with passenger rights on it. "their preferred means of communication" is incredibly abusable language, which will lead to airlines obfuscating as much as they possibly can.