

Submitted to the Canadian Transportation Agency (Form submission)

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

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Airlines have routinely used random rationale to avoid paying compensation to passengers. Passengers typically get emailed the rationale that it was for safety reasons or safety-related constraints that led to the delay. Passengers are never provided proof that the delay or cancellation is safety related -- just their word. There needs to be strengthened processes of showing substantial evidence that the delay was safety related and not for any other reasons. Reasons, such as crew shortage, should not be explicitly stated in the regulations that it is safety related.

The other thing that should hold airlines accountable is to arrange automatic compensation instead of requiring passengers to apply for compensation. The application process should only be used if passengers require more than base level compensation (e.g., damage luggage, passenger specific incident that require individualized compensation). If there is a legitimate delay or cancellation that is under the carrier's control, it does not make sense that passengers who are aware of the APPR to get compensated while others who are not aware do not get compensated.