

Submitted to the Canadian Transportation Agency (Form submission)

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

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Almost every flight in Canada has passengers who are flying "standby". These are current or former employees of the airlines or people who do not work for an airline but have benefits because they work for third parties (eg. baggage handlers or contracted services.) They do not pay a traditional fare for these flights. Essentially, standby passengers are on their own for flying. For example, a passenger who is flying from YUL to YVR via YYZ on Air Canada or WestJet is not expecting any assistance from an airline at any of the airports in the scheduled itinerary. They know they are on their own. Difficulties can arise when their flight is diverted to an airport that the carrier does not normally fly to. If a flight was diverted to BZN - where neither Air Canada nor WestJet fly - a standby passenger would be stranded. With no regular service, the standby passenger would not have any recourse except to purchase a full fare ticket on a different carrier. There should be protections (eg. passage on an alternate carrier) for the standby passenger who is not able to continue on their original carrier on the original itinerary.

Consideration for food and water, etc. should also be made available to standby passengers in the event of delays after departing their originating airport. What is, and is not, provided while a passenger is delayed enroute?. Clarification around a standby's rights regarding lost, delayed or damaged luggage should also be included.

Thank you