

## Submitted to the Canadian Transportation Agency (Form submission)

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

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The exceptional circumstances terminology is simply restating the same phrasing from the current bill. It continues to put the power in the hands of the airlines, particularly in situations involving maintenance/mechanical issues.

The rebooking policy needs to address the "spirit" of a reservation - i.e. group bookings/the class of the booking, and what happens when that needs to be rebooked. Currently, airlines will offer rebooked seats that split families up, offer redeye flights in place of daytime flights, overnight layovers, or downgrades from business to economy - without compensation for overnights or downgrades - and consider their rebooking obligation fulfilled, thus alleviating the need to look at other airlines.

Rather than limiting the numbers of flights that can claim exceptional circumstances, would a time limit be more specific, and more fair?