

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

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

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Dear Sir/Madam,

As an avionics engineer working on transport category aircraft, I am glad to hear that the government has noticed that the APPR needs updating. I would like to provide some short feedback on the proposed changes.

Specifically, there is an issue with the handling of manufacturing defects and technical problems. Under the exceptional circumstances proposed we have "Hidden manufacturing defects that come to light and affect flight safety". While under not exceptional, we have "Technical problems that are an inherent part of normal airline operations. The problem is that these two cases are not mutually exclusive; they can both be true at the same time. In other words, an inherent part of airline operations is that manufacturing defects can come to light. Further, manufacturing defects is not clear. Any coverage of technical issues should be clear, as was done in the EU where they came out and said all maintenance/technical issues are covered.

Statements like "Technical problems that are an inherent part of normal airline operations." is still leaving much to interpretation. While at the same time, these statements are of little value to the public. I have visibility into maintenance procedures, MELs, FCOM/QRH, as well as maintenance statistics. However, we also want to make the regulation's maintenance coverage as clear as possible to the general public. We also want to address common cases of EICAS/ECAM messages shown on taxi out canceling the flight.