

July 26, 2023

Air Consultations
Canadian Transportation Agency
60 Laval Street
Gatineau, QC, J8X 3G9

Re: Consultation Response

Dear Air Consultations,

Upon reviewing the proposed amendments to the APPR, further clarification is required for the applicable areas.

- How can airlines differentiate manufacturing defects and technical problems? Technical problems can be anything from software components to mechanical issues on board an aircraft. How can a third-party platform be considered “not exceptional”?
- Contractual relationships are common in the aviation industry, if the service provider incurs a technical problem that hinders the service, how is this considered not exceptional? Some airports in Northern remote locations only have one service provider.
- With the burden of proof transferring from passenger to airline, what will the CTA allow for documented proof? Technical documents contain proprietary information, which will not be passed onto the public. Often the delay code is passed on to the public.
- The wording of “impossible to safely operate the flight” may be interpreted differently by each carrier. Airlines operating in Northern areas deal with numerous variables that affect operations such as weather impacting runway surfaces. Due to a lack of infrastructure, many runways and de-icing services are not sufficient for the operation on certain days.
- Communication is often covered by SMS, email, or phone. However, many third party agencies are responsible for booking passengers for medical travel out of the north. Many community members rely on social media to communicate, rather than by phone or email. Standards should be set for travel agencies to provide the required communication information for airlines to succeed.

As the industry seeks to become standardized, many challenges remain in Northern Operations. Infrastructure in northern communities creates many barriers compared to large airports in the southern region. Both regions should not be held to the same standards in respect to penalties due to the difference in

infrastructure. Many airlines operating in northern remote areas provide an essential service, additional penalties only create additional challenges. Operators will need to increase fees to offset additional APPR costs, a controversial issue in remote areas due to the high cost of essential services. If standards can be broken down into the size of the operation, the geographical scope should be considered.

Thank you for the consultation, I look forward to any feedback.

Sincerely,



Brad Byrne
Vice President, Commercial Services
Brad.byrne@perimeter.ca
Perimeter Aviation LP