

Submitted to the Canadian Transportation Agency (Form submission)

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

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Date: 2023-08-09

Please find attached my feedback regarding proposed changes.

Attachment:

To whom it may concern,

Please find below my feedback regarding the proposed changes to the APPR:

3. Rebooking and refunds

Proposed changes:

“It is proposed that passengers would have a right to choose a refund, under the APPR, if their flight has been disrupted and they cannot complete their trip within a reasonable time (for example, if the offered rebooking was so delayed from the original departure time that the trip would no longer serve the passenger's original purpose).”

My feedback from my recent experience from travelling in July would be that the airline must also make rebooking accessible, at the check-in counter. **<Removed >**

5. Communications

Current APPR:

“In all disruption situations, an airline must explain the reason for the disruption in plain language.”

I would like to recommend that merely using plain language is not enough. Airlines should be accountable for transparency regarding the reason for the disruption.

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6. Chain reactions (knock-on effects)

Proposed change:

“Under the APPR, passengers would be entitled to compensation for all flight disruptions unless there are exceptional circumstances. It is proposed that only two flights in a row can claim the same exceptional circumstance as the reason they have been delayed or cancelled. This would limit the exemption to pay compensation for inconvenience to only:

The flight that actually experiences the exceptional circumstance; and

The next flight scheduled to use that plane (or flight crew).

No further flights could claim the original exceptional circumstance as the cause of a disruption.”

This is an excellent change. In the example above, after conducting research on the actual reason for the delay on the example above, I found that our flight was the third scheduled flight that suffered a cancellation.

However, there should also be clear rules regarding knock-on effects when there are several causes for the delay. For example, when a delay takes place due to weather, and this delay causes “crew constraints”, which reason should take precedence?

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