

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: 2023-07-12

A few observations and suggestions. Improvement to the regulations will certainly be welcome. First observation: EU regulations are much more tilted in favour of passengers and are successful at defining when airlines are to be held accountable for delays and cancellations and when not. And, especially, under what conditions airlines are responsible for compensating passengers, rebooking them, etc. EU regulations would make a good model for what could work in a Canadian context. Second observation: relates to delay and cancellation notes that airlines enter into their systems. These are made available to passengers via subscription services such as Expert Flyer. My experience is that the initial notes entered into the system when there is, say, a flight delay are often changed later. Sometimes, the change does not accord with the initial notes nor with my observations. For example, I was recently on a delayed flight. The gate agents announced repeatedly that we were waiting for crew to arrive from another flight. Initial notes reflected this. Later notes indicated “airport constraints”. The flight was not delayed enough for compensation to be due, but had that been the case the airline would likely have denied the claim based on “airport constraints”. My suggestion is that the notes that accompany operational delays and cancellations be archived in a central system, including changes, so they can be verified when claims are made.

Thanks!