

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

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

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Typical travellers make their reservations days, weeks or months in advance and are required to pay in full at the time. These funds are, in effect, loans to the airline for which the airlines pay no interest. However it forms a contract so airlines should not be permitted to overbook seat capacity as they have been paid for those seats whether the seats are filled when the flight leaves or not. Airlines should not be permitted to bump passengers who have paid without their approval of compensation acceptable to them.

Furthermore, the default condition when a flight is cancelled for any reason must be full monetary compensation within 48 hours unless the affected passenger gives written approval for some other offer. Offering airline credits or "banked funds" is not an acceptable alternative to many customers as it ties them to that airline and extends the length of the "loan" to the airline.