

Submitted to the Canadian Transportation Agency (Form submission)

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

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2. "Airport operational issues" is too general to be an exceptional circumstance and should be removed or specified in sufficient detail to ensure that these events are beyond any ability of the airline to mitigate. Labour disruptions at the airline are within the control of the airline and this should not be treated as an exceptional circumstance.

3. Denied boarding has insufficient scope in the APPR, as airlines are currently taking advantage of small delays to rebook checked-in passengers off of delayed flights, and claim that it does not fall under a denied boarding circumstance. Airlines also do not currently staff their gates adequately to provide support to passengers who seek entitlements such as denied boarding claims or rebooking on another airline. Due to the complexity of rebooking, airlines should be required to provide staffed service for rebooking or denied boarding claims for a duration surrounding each disrupted flight.

5. Airlines should be required to inform passengers of the specific monetary value of the compensation to which they are entitled.