

Submitted to the Canadian Transportation Agency (Form submission)

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

Name: Austin Zhang

Date: 2023-07-24

See attached word document.

Attachment:

Regarding the changes to the APPR to an exceptional circumstances exclusion list, the following should be clarified:

1. Hidden manufacturing defects that come to light and affect flight safety

What is considered a "hidden manufacturing defect?" Would this include a part that breaks and requires maintenance to replace it, or is this solely for manufacturing recalls by the airplane manufacturer. If it is only the latter that is acceptable, but if it includes the former, airlines can call any maintenance issue a "hidden manufacturing defect."

2. Airport operational issues for which the airline is not responsible

What constitutes an "airport operational issue?" Does this include third party baggage handlers/gate agents, etc? I believe that airlines are responsible for these third parties as they are contracted to perform the services by the airline.

3. Labour disruptions at the airline or by essential air service providers like airport managers, air navigation personnel, or ground handlers

I believe that labour disruptions at the airline are the airlines responsibility as the airline is the sole party that can resolve the issue, and so should not fall under "exceptional circumstances."

Under 4. Assistance, 12 hours is insufficient time to let passengers know of a delay if the airline does not want to provide assistance. 24 hours is more reasonable as it allows people to change their travel plans (eg. car rentals, hotels) when given sufficient notice.

Under 6. Chain reactions, the proposed change to limit the exemption to “The next flight scheduled to use that plane (or flight crew)” should not include flight crew. Flight crew are strictly under the airline’s control and therefore the airline is able to mitigate its impacts regarding crew hours. Therefore, I do not believe that the exemption should include flight crew.

Under 7. Refunds for changes to Government Travel Advisories, I do not agree with this being added to the APPR. It places an undue burden on airlines to refund flights due to a change in government advice. Passengers should claim these costs against their travel insurance should they not want to travel. However, free changes to the itinerary and keeping the cost of the flight as non-expiring travel credit would be an acceptable alternative.