

Submitted by email to the Canadian Transportation Agency

Subject: Response to your December 11 2020 request from Barrier free Canada - Canada sans Barrières

Dear Sir/Madam:

Please see our response to your request.

Please confirm receipt of our submission.

Thank you

Consultation on Requests for Temporary Adjustments to the Requirements of the Air Passenger Protection Regulations (APPR).

Barrier Free Canada (BFC) believes many consumers, including persons with disabilities, would echo the following sentiment and BFC would like to be on record accordingly.

Given airlines in many cases have already retained the funds for services not able to be rendered due to the impact of the COVID 19 pandemic, including choosing to offer travel credits with limitations in lieu of a refund in some cases, we find it challenging to support providing air carriers any further relief from the obligations as set out in the Air Passenger Protection Regulations.

With respect to the compensation for delayed flights, it is unreasonable that the carrier be required to compensate impacted passengers anything less than what is required by the APPR.

We can understand the industry's desire to seek relief from select obligations set out by APPR which were drafted at a time when Covid was not a reality let alone envisioning something that would virtually shut down the airline industry for an extended period of time.

However we understand Minister Garneau has tasked the Canadian Transportation Agency (CTA) with drafting regulations that aim to make some uncontrollable events compensable by the air carrier in the event they are unable to facilitate completing the passenger's intended journey within a reasonable period of time. It could be argued that those regulations may address this issue going forward.

Thank you

Barrier free Canada - Canada sans Barrières