

Submitted by email to the Canadian Transportation Agency

Name: Barrier Free Canada

Subject: In response to your Exemption Requests - Cas(e) No. 20-09256

Dear Secretariat,

Barrier Free Canada would like to submit the following in response to your invitation to provide submissions regarding the support package for financial aid to Air Canada.

Access to the federal transportation network is not only a regulatory requirement but also a human right for persons with disabilities. While commercial implications are considered to the point of undue hardship, these accessibility related obligations remain regardless of the financial condition of the service provider, to the point where providing said accommodations would threaten the viability of the entity.

We recognize the need for this financial aid is directly linked to the financial hardships generated through the negative impact of the pandemic, however these hardships are felt equally, albeit in different ways, for persons with disabilities.

Like the various other conditions accepted by Air Canada in order to receive financial assistance, BFC demands the reasonable and expected condition that Air Canada provide, in writing, a commitment to secure immediate full compliance with all requirements contained within the Accessible Transportation for Persons with Disabilities Regulations (ATPDR) issued by the Canadian Transportation Agency. Conditional of receiving said funding, any exemptions / deferrals being sought from provisions of the ATPDR either be rescinded or, alternatively, Air Canada would be required to provide firm dates for full compliance with any elements for which they are currently seeking exemptions / deferrals from. Failure to comply with stated deadlines would result in enforcement action as authorized by the regulations.

If for no other reason this will compel Air Canada to provide the traveling

public and persons with disabilities clear, written, and visible assurances they will provide a fully accessible transportation network within specific timeframes.

We thank you for this opportunity to provide input and look forward to ongoing dialogue as needed.

Please confirm receipt.

Respectfully,

Donna J. Jodhan

On behalf of Barrier free Canada - Canada sans Barrières