

November 13, 2020

VIA EMAIL

Canadian Transportation Agency
 15 Eddy Street
 Gatineau, QC K1A 0N9

Attention: Marcia Jones, Chief Strategy Officer

RE: Request for Extensions to Accessible Transportation for Persons with Disabilities Regulations (ATPDR) Requirements

This letter is provided further to our previous extension request which was granted to December 31, 2020. The Calgary Airport Authority (CAA) respectfully requests specific additional extensions to the requirements under ATPDR under subsection 170(3) of the Canada Transportation Act (Act) due to the ongoing impact of the COVID-19 Pandemic and continued financial and operational impacts at the YYC Calgary International Airport. We understand that the Canadian Transportation Agency (CTA) was seeking that the requests for extensions be specific, targeted and reasonably short and for stakeholders to substantiate why exemptions for certain provisions are required (for example, they require significant capital expenditures). We further understand that any extensions would also need the approval of the Governor in Council (Cabinet) under the Act. We request further extensions as outlined in the chart below.

The CAA has made significant progress meeting the ATPDR Requirements since the original Exemption Order was issued by the CTA in June of 2020 and expects to be fully compliant with most requirements by December 31, 2020. However, the CAA is seeking further extensions as outlined below for compliance to three specific requirements due to the severe and prolonged impacts of the pandemic on the aviation industry, as they require significant capital expenditure and additional time to implement.

Section ID	Requirement	Exemption
Personnel Training for the Assistance of Persons with Disabilities		
15-23	Personnel Training for the Assistance of Persons with Disabilities	The CAA has engaged a vendor who is working with us to develop our new training program. However, delivering the training will require significant capital costs (materials and consulting expenses) and in-person training sessions. As discussed above, due to COVID-19 pandemic and impacts to the CAA's financial situation and the CAA would be better equipped to take on these substantial costs in 2021. In addition, appropriate social distancing will impact the ability to provide in person training sessions. As such, we respectfully request an extension of time to meet these requirements to June 30, 2021.

Section ID	Requirement	Exemption
Service Requirements		
216	Assistance for Persons with Disabilities	The CAA continues to work with personnel and airlines to ensure that individual requests for assistance are accommodated. The CAA has recently purchased several wheelchairs and installed appropriate signage on the curb. However, due to the financial impacts of the pandemic and the substantial cost of upgrading the curb area and installing intercoms/telephones, the CAA is requesting a further extension to complete this requirement to June 30, 2021.
227(4)	Designated Relief Area – Direct Access from Restricted Area	The June 25, 2021 deadline is fast approaching and significant construction within the terminal is needed to provide relief areas within the terminal. To have all construction completed by the deadline, this work would need to be underway in the first quarter of 2021, whereas revenue is not expected to improve until later in 2021. The CAA is requesting a further extension to complete this requirement to December 31, 2021.

The Calgary Airport Authority is committed to meeting the requirements of the ATPDR and has made significant strides towards compliance. However, the COVID-19 pandemic continues to significantly impact our ability to improve our programs in the short term. We thank you for considering our extension request to provide us with more time to achieve compliance.

Your truly,
THE CALGARY AIRPORT AUTHORITY



Carmelle Hunka
Vice President, People & Risk and General Counsel

