

November 1, 2024

Canadian Transportation Agency

OTC.FPRTA.Consultations-Consultation.CTA.ATCC@otc-cta.gc.ca

Re: Canadian Transportation Agency Consultation: Air travel complaints fee proposal

To Whom it May Concern:

On behalf of the Charlottetown Airport Authority Inc., I am writing this letter to strongly urge the Canadian Transportation Agency (CTA) not proceed with the proposed air traveller complaints fee.

Canada is the second largest country in the world by land mass with our population centres vastly disbursed across the country, making it imperative that every community has access to affordable and dependable air travel options. Air travel in this country is not a luxury, it is a necessity. It is in this context that the CTA's air travel complaints fee proposal needs to be considered. At YYG Charlottetown Airport, we have recently lost air service (Flair Airlines) due to APPR related costs. Adding more costs to the system, which will ultimately be passed on to travellers, will not help us rebuild air service for our community.

It is important that the Canada's passenger protection regime strike the correct balance — incentivizing high service standards and protecting travelers, while not increasing costs for passengers, reducing connectivity, or shrinking the Canadian aviation sector's competitiveness.

At a time when the entire aviation sector is looking for ways to recover from the pandemic and make air travel more affordable for all Canadians, the CTA is proposing a cost recovery system that will add undue costs for all air travellers. To cover the costs of complaints and to inoculate against future costs, air carriers will have no option but to raise their airfares and reduce air services.

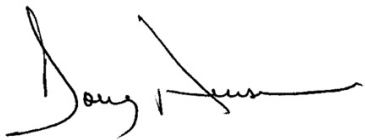
The CTA has also chosen a very high fee for carriers to pay for each complaint. A \$790 fee is inordinately high and possibly punitive. It is the legislated mandate of the CTA to administer adjudication of complaints against air carriers, and while the CTA does have the ability to invoke a cost recovery regime, it is essential that parameters and values attached to the regime do not unnecessarily harm air carriers or the travelling public.

The CTA must also examine the potential negative impacts on regional air connectivity, like Charlottetown. Not only are we losing air services that have started since the pandemic, but we have also yet to rebuild our regional connectivity. This is due to many challenges currently facing our industry - air carrier fleet changes, the pilot and aircraft mechanic shortages, thin margins and existing APPR. Injecting

increased risk and costs onto these regional routes has the potential to reduce regional connectivity while increasing the cost of travel further.

We strongly advise the CTA not to proceed with the proposed cost recovery regime as proposed in this consultation. As put forward, this regime would only increase costs to all travellers across the system without providing any additional benefit or protection. Furthermore, the proposed mechanism would further jeopardize regional connectivity for airports like Charlottetown through increased air carrier costs and risks.

Sincerely,

A handwritten signature in black ink, appearing to read "Doug Newson". The signature is fluid and cursive, with a long horizontal stroke extending to the right.

Doug Newson
Chief Executive Officer

