

Date: November 04, 2024

From: Victoria International Airport

To: Whom it may concern

Canadian Transportation Agency

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

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

The object this letter is to outline the position of Victoria Airport Authority (VAA), on the above-mentioned topic. We write to express our support for the Canadian Airports Council's (CAC) submission regarding the Canadian Transportation Agency's (CTA) proposed air travel complaints cost-recovery regime.

VAA shares CAC's concern that introducing a new cost-recovery mechanism, as outlined in the proposal, risks increasing travel costs and jeopardizing regional connectivity without a commensurate enhancement to passenger protection.

The CTA's existing framework, particularly the Air Passenger Protection Regulations (APPR), already offers robust mechanisms for upholding passenger rights. Through APPR, established compensation structures, standards of treatment, and formal complaint channels, the CTA has effective tools to enforce consumer protections. Additionally, the CTA's powers to impose monetary penalties, conduct audits, and carry out regular monitoring ensure compliance within the industry. Together, these tools represent a comprehensive regulatory approach, balancing traveler protection with industry sustainability.

VAA recommends that the CTA consider alternatives that avoid increasing the cost burden on carriers, which will undoubtedly be passed on to the air travelling public. Rather than implementing a new cost-recovery regime, the CTA could leverage and strengthen its existing accountability frameworks to manage complaint-related costs sustainably. By utilizing established mechanisms more effectively, the CTA can maintain high service standards without imposing additional financial strain on the sector, particularly in Canada's regional and remote communities where connectivity remains fragile.

We encourage the CTA to adopt less intrusive, sustainable methods to fulfill its mandate in a manner that preserves affordability and accessibility for Canadian travelers.

Thank you for considering our input on this matter. We trust that the CTA will consider the broader impacts of this proposal on Canada's aviation ecosystem and regional connectivity.

Sincerely,



Elizabeth Brown
President and CEO

Victoria Airport Authority