

Submitted to the Canadian Transportation Agency (Form submission)

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1. The entitlement to a refund will apply if the airline cannot complete the passenger's itinerary within a reasonable time. In the context of an event outside of an airline's control - such as a border closure, security incident, or volcanic eruption - what should be considered a "reasonable time" for completing a passenger's itinerary? **15 days**
2. The entitlement to a refund could potentially apply not just in the context of a flight cancellation, but also a "lengthy delay." What should be considered a "lengthy delay"? **6H**
3. What should a refund cover? **The reimbursement of the cost of the ticket, less de service fee charged by the airline, at the price at which it was bought, for the part or parts of the journey not made.**
4. How should airlines be required to refund passengers? **Passenger's choice of money or other forms offered by the airline (i.e vouchers). The monetary reimbursement shall be made through the same way used for the purchase.**
5. How much time should airlines have to provide refunds to passengers under the new requirements? **30 days**
6. a) Should there be greater flexibility in the requirements for certain types of airlines, or in certain situations? **More flexibility for smaller airlines that operate in remote and regional communities. Particularly, in situations of large-scale events that can threaten the airline's financial viability.**
b) If so, in what areas should flexibility be given? **Larger deadlines to provide a refund to passengers, in particular in situations outside airlines' control.**
7. Are there other, specific pandemic-related situations that you think should be considered either within or outside airlines' control? **Lockdown impose by authorities and that prevent the passengers from freely circulating and travelling on the flights previously booked. The airline might have to cancel flights during lockdowns with the assumption that passengers will be no-show and the flights will be empty.**
8. The CTA will consider the legal frameworks in the European Union (EU) and the United States (US) in developing the new regulation on refunds. What particular aspects of these frameworks should the CTA consider? **COMMUNICATION FROM THE EUROPEAN COMMISSION - Guidance from the European Commission on using the public procurement framework in the emergency situation related to the COVID-19 crisis**