



December 11th, 2020

Attn: Marcia Jones

Dirigeante principale, Stratégies/Chief Strategy Officer

Office des transports du Canada/Canadian Transportation Agency

15, rue Eddy/15 Eddy Street

Gatineau, QC, K1A 0N9To the Canadian Transportation Agency

Reference:

requests by transportation service providers for further delay to the coming-into-force of certain provisions of The ATPDR, due to the ongoing impacts of the COVID-19 pandemic

The continued unprecedented challenges the industry has faced driven by Covid-19 has led to drastic reduction in our flight schedule and human resources company wide. Further still those limited human resources have had a continuous stream of new processes and tools to action in response to Covid-19 driven regulation, process and procedure changes and requirements from various governments and governmental agencies. We seek extension to the compliance date requirements of the following sections of the ATPDR.

Section 9 – website requirements

With reference to the accessibility compliance requirements of our website and applications we have made significant progress. It has been very challenging based on the aforementioned resources limitations and continually evolving priorities driven from the urgency of the COVID response. Website content is inconstant flux. Again, driven by the obligations of carriers to provide direction to passengers on Covid-19 regulatory requirements and obligations as well as the changing service offerings and flight schedules this causes. We would propose a further delay on this ATPDR requirement until the spring 2021. We hope by that point in time to see a more constant and predictable worldwide regulatory regime on all Covid-19 protocols and procedures. This enables our IT teams to deliver a more complete final product as opposed to interim solutions driven from the constant change and limited resource allow us.

The upgrading required to our operating systems, data bases and third party IT solutions to support Section 59 of the ATPDR with reference to retaining electronic copies of passenger provided ATPDR information has been equally impacted by all the



aforementioned challenges. Again, we would propose a delayed coming force date on this item until spring 2021.

Sections 15 to 23 – training requirements;

As previously mentioned, the Covid-19 pandemic has driven drastic reductions in our staffing levels in all areas including our training group. Our front-line people who are being recalled as some resurgence in flight activity occurs have significant refresher/return to service training time requirements. Extending those training timelines further at this point makes it more difficult to increase flight activity in a flexible manner that is required to reignite air travel in Canada. Similar challenges have also impacted most of our third party ground handling suppliers. The international border closures or quarantine requirements tied to various international destinations we operate to and from has made it very challenging to efficiently deploy training and support teams as required. We hope to see a more normalized cross border movement worldwide in the coming months. Again, we would propose an extension to this element of the ATPDR regulation until Spring 2021.

Respectfully

Len Corrado
Vice President Commercial Operations
Sunwing Airlines