

Submitted by email to the Canadian Transportation Agency

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Subject: Consultation on new refund requirements

Hi there!

Please see the attached comments. Thank you!

1. If the airline is unable to complete an itinerary through no fault of their own in the case of a large scale event, like a pandemic, border closure, basically any case other than a local weather event, then there should be no obligation of a refund, only future credit. The airline made the preparations, spent money and time training staff, maintaining aircraft, etc to make sure they upheld their end of the bargain. External events made it impossible to carry out the mission, the airline should not be obligated to take a loss, given that future demand is already likely impaired and not necessarily quick to recover. The consumer shouldn't be coddled. If the consumer wanted certainty of a potential refund, then they could buy a fully refundable fare, or purchase travel insurance.

2. Lengthy delay should be arrival at destination greater than 24 hours more than the scheduled arrival time but flight length should be taken into account. Shorter flights should have shorter time frames. If it's a 20 minute flight, then perhaps 4 hours. 16-hour flight perhaps 40 hours.

3. Whole fare with purchased extras aside from services rendered at the airport if used, such as lounge access.

4. Original method of payment.

5. 14 business days

6a. Absolutely there should be flexibility given the size and scope of the airline operation.

Smaller northern operators can't possibly be expected to conform to the same requirements as large part 705 operators. Northern conditions present unique resource limitations that large airports typically don't present.

In all cases, black swan events shouldn't trigger refunds that threaten the viability of the airlines, especially if the Government is going to drag their heels with a support package 9 months after the fact. In the event of a black swan event lengthy delay guidelines should be suspended entirely. Refunds only in the form of credit with no expiry length, though I would support sector/price protection, i.e, if you booked a flight from YYZ to LHR for \$1000, you could select a seat a year later for a flight from YYZ to LHR regardless of the going price or apply that \$1000 to another fare.

6b. Length of delay guidelines should definitely be more relaxed for northern operators.

7. Flight consolidation following an event like a pandemic makes perfect sense. It's not reasonable to expect an airline that was running 10 flights a day between a city pair to continue to run said flights with very few people on them. It's a poor decision financially, and environmentally. During this period of uncertainty, consolidation of flights shouldn't be considered within the airlines control because demand is quite literally unforecastable.

8. Airlines operating under these frameworks typically received support packages from their respective governments. That fact should be taken into consideration when looking at what works and what doesn't.

-Taylor Fell