

**BY EMAIL**

Canadian Transport Agency  
15 Eddy Street, 19th Floor  
Gatineau, Quebec K1A 0N9

By email: [OTC.CETA-CEAT.CTA@otc-cta.gc.ca](mailto:OTC.CETA-CEAT.CTA@otc-cta.gc.ca)

Dear Madam, Dear Sir,

**Re: Submission regarding Consultation on Requests for Temporary Exemptions from the Accessible Transportation for Persons with Disabilities Regulations**

We are writing to you in order to respectfully submit our comments regarding the "Consultation on Requests for Temporary Exemptions from the Accessible Transportation for Persons with Disabilities Regulations" (the "Consulation").

As the Agency is acutely aware and as repeated by the transportation service providers ("TSPs") and associations representing TSPs who submitted temporary exemption requests from certain obligations under the Accessible Transportation for Persons with Disabilities Regulations ("ATPDR"), the COVID-19 pandemic still has devastating effect on the aviation industry.

In this context, while Turkish Airlines remains fully committed to provide accessible transportation services to persons with disabilities, Turkish Airlines shares the difficulties mentioned by the other TSPs. The current lack of resources, both in terms of investments and in terms of work force, inside the airlines and within third-party suppliers, and the multiplication of worldwide requirements that airlines must comply with, makes the compliance with certain ATPDR's obligations very difficult at the present time.

Therefore, Turkish Airlines supports the TSPs' temporary exemption requests, in particular the ones submitted by the International Air Transport Association and the other airlines.

Moreover in the interest of equal treatment and of a competitive market, Turkish Airlines respectfully submits that any exemption granted by the Agency pursuant to the temporary exemption requests should be granted to all TSPs, in an identical manner.

We thank you for your consideration.

Yours truly,

