

The Agency invites interested stakeholders to submit their comments on the Agency's proposed approach, including with respect to the following questions:

- Whether Indirect Air Service Providers should be required to hold a licence to sell their services directly to the public, in their own right. Provide a clear explanation for your position;

IASP should **not** be required to hold a licence provided the travelling public can be protected in times of business interruption or failure and be guaranteed that their ticket funds can be returned. As an example this may mean a business model that escrows funds until the trip is completed. Naturally the carrier providing the lift would be required to maintain the appropriate CTA licence. In this case the IASP is essentially a storefront for the actual carrier.

- What criteria the Agency should consider in determining whether an Indirect Air Service Provider is holding itself out as an air carrier, and therefore, should be required to hold the licence; and

Any time individual seat sales to the travelling public are contemplated, should the IASP not disclose who the carrier is or willfully withhold this information from the travelling public, the IASP would be required to obtain their own CTA licence.

- What regulatory amendments, if any, should be contemplated to clarify who is operating an air service and is required, as such, to hold a licence.

Merely that in the case of an IASP, full disclosure to the public is required as to the nature of the arrangement between the IASP and the carrier, and with whom the liability for ticket sales resides.

With Kind Regards,

Past Business Development Manager for R1 Airlines in Calgary. Now in regional aircraft leasing at Avmax.

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