

The main point of my statement is to support NewLeaf as an Indirect Air Service Provider (IASP).

My principle comment would be, to paraphrase our fine new Prime Minister, the Honourable Justin Trudeau, responding when questioned about another **OBVIOUS** need for change regarding females in our federal cabinet **BECAUSE IT'S 2016!**

The same principle applies to air service in Canada. ... modernize up! Your 1996 Greyhound Decision is **20 years out of date**. OBVIOUSLY we need a change in airline providers in this great country because we are currently being held hostage by a limited number of providers who have a “too cozy” relationship when it comes to pricing. Come on people, Let's move forward!

I am a scientist, not a businessman, but everyone knows the basic principle that:

- more companies in any sector = more choice = more competition = eventually lower prices for consumers (with a choice of product quality).

To address your required three (3) points:

- 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;

NO. The IASP should not be required to hold a licence to sell their services directly to the public for domestic services, , in their own right, when it is not required for international services. It is ridiculous that you have a double standard. To quote directly from your website (<https://www.otc-cta.gc.ca/eng/consultation/consultation-requirement-hold-a-licence>) **“Consequently, under the current approach, a person who is in commercial control of an air service and does not operate aircraft must hold the licence for domestic, but not for international air services”**. Why? makes no logical sense. Drop the requirement regarding domestic air services to bring it in line with the requirement for international air services.

- 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;

This is a moot point, ...it is not necessary. The IASP should not be required to hold the licence.

The only criteria should be enforcement of the criteria that the licensed air carrier(s) with which the IASP is representing or associated **must** hold a valid Canadian Aviation Document (CAD) issued by the Minister of Transport.

- 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.

Again a moot point. The IASP should not be required to hold the licence. The regulatory amendments should state that the IASP should not be required to hold the licence as long as the licensed air carrier(s) with which the IASP is representing or associated **holds** a valid Canadian Aviation Document (CAD) issued by the Minister of Transport.

Regards,
Charles Geen