



February 5, 2021

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VIA EMAIL

Secretariat
Canadian Transportation Agency ("Agency")
15 Eddy St.
Gatineau, Quebec
Canada J8X 4B3

Re: Swoop Response to Case No. 20-01590

Dear Secretariat,

We are in receipt of the Agency's Letter Decision No. LET-C-A-72-2020 issued on November 5th, 2020 (the "**Letter Decision**") regarding alleged air carrier non-compliance with communication requirements under the *Air Passenger Protection Regulations* SOR/2019-150 (the "**APPR**"). The Letter Decision incorporates the summary report of the Inquiry Officer dated October 1, 2020 (the "**Report**") and asks carriers to provide comments on the Report, along with eight APPR related questions.

We have reviewed the Report and have noted a number of inconsistencies. These are attached as Appendix "A" for your reference; we ask that the Report be corrected to reflect these differences.

We have also reviewed the Letter Decision and eight interpretation questions. WestJet has prepared a formal response to these questions and we write to confirm our support of their positions. We would particularly highlight the network challenges faced by an Ultra Low Cost Carrier (ULCC) regarding crew shortages as contemplated by question four of the Letter Decision. Specifically, a point to point network like that utilized by Swoop does not have the same schedule redundancies as a larger (non-ULCC) carrier, nor does it keep as many reserve crews available on standby. Swoop's network is predicated on direct, non-stop flights, without layovers or complex connections – simply from point A to point B. Requiring additional crew on standby or reserve aircraft would undermine the economics of the ULCC model in Canada. This model is a central component of pulling Canadians back from U.S. border airports and stimulating growth of smaller Canadian airports outside of major hubs – key objectives that Swoop is directly supporting.



Furthermore, as highlighted by WestJet, Swoop is concerned with overly prescriptive regulations, specifically when one considers the complex and immensely variable nature of day-to-day airline operations. Consideration must be given to our complex operating environment with an understanding that there is no one-size-fits-all approach to the industry.

Swoop remains committed to making air travel more affordable in Canada, and we are happy to discuss any of the above matters further.

Yours truly,

A handwritten signature in black ink, appearing to read 'J. Strang', is written below the text 'Yours truly,'. The signature is fluid and cursive, with a long horizontal stroke extending to the right.