



April 9, 2020

Mr. Scott Streiner
Chair and CEO
Canadian Transportation Agency
15 Eddy Street, 17th Floor
Gatineau, QC J8X 4B3

Via email: Scott.Streiner@otc-cta.gc.ca

**Re: Accessible Transportation for Persons with Disabilities Regulations (ATPDR)
Exemptions due to COVID-19**

Dear Mr. Streiner:

ATAC has represented Canada's commercial air transport industry since 1934. We have approximately 190 members engaged in commercial aviation operating in every region of Canada. Never in the history of the association and of the aviation industry have there been challenges associated with one global event as large as the COVID-19 pandemic.

The COVID-19 pandemic has been a major disruptor to the aviation industry and to all of Canada. ATAC has reached out to the Federal Government asking for immediate financial support for our companies and the aviation industry. Air operators are operating at drastically reduced capacity and in many cases well below 10% of their capacity or less. Some air operators have stopped operating altogether with the intention of retaining cash flow for a potential start-up date after the pandemic. This has threatened the existence of many ATAC companies.

The financial crisis is real with massive layoffs of employees with no return date in sight. We recognize that the airline industry must provide accessible transportation to the travelling public and have been working towards the goal of implementing the ATPDR requirements.

The economic impact of measures to contain the spread of COVID-19 has created significant operational challenges in the short term. The focus of our members is to weather the storm while remaining solvent.

This can be achieved by seeking your attention in the following areas:

- Northern Operators will continue to be the hardest hit in terms of compliance in the development of infrastructure to meet the ATPDR. In the spirit of the COVID pandemic these costs will be further amplified in the short term and will create undue hardships to comply, thereby requiring some cost-sharing from the Government of Canada.

For example, the creation of access to aircraft at airports in the north will be a significant cost that cannot be budgeted for under the current economic climate.

- In the re-start of the airline industry post COVID-19 there will be significant costs associated with training staff to be compliant with the ATPDR. The organizational commitment and cultural change to accessibility will require substantial technical change and time from airline staff and training contractors. Many of the resources needed to implement such changes have been stopped and employees furloughed during the COVID-19 crisis.

ATAC requests that the CTA extend the deadline to comply with these requirements until 12 months after the termination of the COVID-19 pandemic.

ATAC is seeking government support in subsidizing the cost of training in a meaningful way. Delaying the implementation of Phase 1 and 2 of the regulations would be a significant benefit in managing the costs of ramping up training once airlines have assessed the costs post COVID-19.

We would also like to respectfully submit the request that any exemptions that are offered to non-ATAC airlines be extended to the industry at large for the benefit of all.

Respectfully yours,

A handwritten signature in blue ink, appearing to read "John Mckenna". The signature is fluid and cursive, with a large initial "J" and "M".

John Mckenna
President & CEO