



December 30, 2014

To the Chair, Advisors and Secretariat of the Canadian Transportation Act Review
C/O 350 Albert Street, Suite 330
Ottawa, ON K1A 0N5

Introduction

The Canadian Automobile Association (CAA) welcomes this opportunity to present its position on some matters being examined by the Canadian Transportation Act review.

Founded in 1911 to represent the interests of the motoring public, CAA today is a federation of nine clubs providing over 6 million Members with emergency roadside service, automotive and travel services, member savings and insurance services. CAA also advocates on issues of concern to its members, including road safety, the environment, mobility, infrastructure and consumer protection.

Given the scope of the present review, our comments in this brief submission focus on air travel. As one of Canada's largest consumer organizations, which also offers a full range of travel services online and through 104 retail travel agency locations across the country, we believe we have an important and informed perspective to bring to bear. We would welcome the opportunity to expand on our views as the review continues.

Background

Travel by Canadians, whether domestic or international, is a huge driver of Canadian employment and economic value. It is a key to opening up opportunities for foreign investment in Canada as well as identifying export opportunities for Canadian goods and services. Air travel is also critical to maintaining many Canadian communities, and to the tourism sector, both inbound and outbound.

The cost, quality, and reliability of services provided at and by our airports, including checked baggage screening and handling, personal security screening, immigration services, and airports' ability to manage communication and crowd handling during crisis situations, are of major concern to our Members. The clarity of air ticket pricing in an era of increasing surcharges, and clear, transparent and accessible rules about compensation and problem resolution when services are not delivered as contracted, are also important issues for our members. For the time being, we will restrict our comments to two pressing areas where we believe solutions are relatively clear and implementable.

500-1545 ave Carling Ave, Ottawa, ON K1Z 8P9 Tel/Tél 613.247.0117 Fax/Télec 613.247.0118 CAA.ca



Recommendations

1. Delivery of security services by CATSA at our airports

- We believe CATSA should be tasked with delivering better, more reliable and accountable service to Canadians, primarily through service-level commitments. Both the commitments, and results tracked against those commitments, should be made public and displayed in airports as well as on the CATSA website. Every effort should be made to improve service levels without increasing fees.

2. Process and Compensation due to Overbooking and non-weather-related delays

- While airlines need to maintain the flexibility to overbook flights for commercial reasons, when this occurs, passengers need easy access to information on their rights. The current situation often results in a one-off negotiation between a gate agent and a stressed, time-sensitive passenger who does not know how much the airline can or will offer in compensation. The same is true for passengers affected by flight delays or cancellations. In both cases, the result can be unequal access to compensation.
- The airline should be required to give passengers in this situation a document outlining the airline's schedule of minimum compensation (or be directed to an easily accessible, plain-language online resource that does the same).
- The Canadian Transportation Agency should be empowered to make rulings on consumer complaints that apply across the industry. This would simplify and clarify the system for consumers and airlines, and lower regulatory costs. At present, complaints must be brought against each airline in turn in order to achieve a system-wide outcome, which is duplicative, time-consuming, and dependent on activist complainants.
- The public needs to know their rights in order to claim them. At present, publicizing of the complaint mechanism is, to say the least, minimal. The Canadian Transportation Agency should be given a small but expanded budget to market the complaint mechanism and air traveller rights, and the airlines should be required to include plain-language, large-type information about the complaints process and the CTA website.



Conclusion

We thank the members of the panel and the secretariat for this opportunity to contribute to the Canadian Transportation Act review. Canada's air transportation system is of vital importance not only as an instrument of economic development, but also as a way of binding our nation and allowing Canadians to enjoy the fruits of our enviable standard of living. We believe there are many opportunities stemming from this review to make improvements that would enhance these goals.

We would appreciate the opportunity to expand on this brief, and will be in touch in the New Year. In the meantime, please do not hesitate should you have any questions or comments.

Sincerely,

A handwritten signature in black ink, appearing to read 'I. Jack', is centered below the text 'Sincerely,'.

Ian Jack
Managing Director, Government Relations and Communications
National Office
Canadian Automobile Association
(613) 247-0117 extension 2007
ijack@national.caa.ca

cc
Brenda Kylo, CAA Vice President, Travel
Tim Shearman, CAA President