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VIA EMAIL ([secretariat@otc.cta.gc.ca](mailto:secretariat@otc.cta.gc.ca))

File

Secretary  
Canadian Transportation Agency  
15 Eddy Street  
Gatineau, Quebec J8X 4B3

Dear Madam Secretary:

**Re: SkyGreece Airlines S.A.  
Case No. 15-03912**

Our firm is in the process of being retained as Canadian counsel for SkyGreece Airlines S.A. We have a copy of the application commenced by Gabor Lukacs (the "Applicant") on August 28, 2015, on behalf of his organization, Air Passenger Rights. We also have a copy of the CTA's correspondence dated August 28, 2015, requiring a response to the Applicant's request for an expedited process of his application by today.

On August 27, 2015, SkyGreece Airlines announced a temporary suspension of its operations, in Canada and abroad. That decision was a difficult one, and SkyGreece appreciates the tremendous impact its operational difficulties have had on passengers. SkyGreece is in the process of consulting with its stakeholders with a view to restructuring its business and operations in a way that will most benefit passengers and other stakeholders.

Contrary to the Applicant's submissions, a substantive response to the issues raised in the application is complex and will be a time-consuming process, particularly given the context of Greece's broader economic crisis, the impact of that crisis on SkyGreece's operations, and the voluminous request for information reflected in the Applicant's letter of today.

No safety concerns have been alleged, and there is no compelling argument in favour of an expedited process. In particular, the Applicant provides no evidentiary support for his allegation that SkyGreece will deal with its assets in a manner that is unfairly prejudicial to its stakeholders, including passengers. In point of fact, SkyGreece is committed to resolving its current operational difficulties in a manner that is consistent with all applicable laws.

Finally, we note that, at this point, it is unclear how many passengers (if any) Mr. Lukacs actually represents, and to what compensation (if any) they may be entitled. The Applicant's standing is concerning considering that the effect of the

relief being sought in the application may prejudice SkyGreece's restructuring efforts and/or produce a suboptimal outcome for all stakeholders, including passengers.

Consequently, SkyGreece does not support proceeding on an expedited basis. While SkyGreece wishes to resolve this application and its operational issues as quickly as possible, this will require careful analysis, consultation with all of its stakeholders, and proceeding in a manner that allows a full response by all stakeholders in accordance with principles of natural justice and the objects of the governing legislation.

Please do not hesitate to contact us should you require further information.

Yours very truly,

**PALIARE ROLAND ROSENBERG ROTHSTEIN LLP**

A handwritten signature in black ink, appearing to read 'Massimo Starnino', written over a horizontal line.

Massimo (Max) Starnino  
MS:dn