



January 14, 2011

The Honorable Chuck Strahl
Minister of Transport, Infrastructure and Communities
Tower C, 330 Sparks Street
Ottawa, ON K1A 0N5

via email:

Re: Alpine Helicopters Exemption to Canadian Ownership Requirements.

Dear Minister:

The Northern Air Transport Association (NATA) represents 31 commercial air carriers operating in the Northern and remote areas of Canada. Our operator members are a mix of fixed wing and rotary wing with nine of them being rotary wing. Regardless of their type of operation they are all concerned about the exemption status of Alpine Helicopters to the Canadian Ownership requirements.

If the ownership requirements truly have value then there should rarely be exemptions, and certainly never ones without strict fences around them regarding type of operation, geographic limits, and defined expiry or review dates. If they don't have value then they should be removed for all operators allowing them unfettered access to foreign capital and the ability to operate on a level playing field.

What we have now with Alpine Helicopters is the worst of all situations. A foreign owned carrier with unfettered rights to operate freely in Canada in direct competition with long standing Canadian Carriers complying with the rules. In some cases they are doing work under Federal and Provincial contracts. To be blunt, this is just plain wrong.

There was perhaps rationale for the original exemption back in 1999. Even that one should have been restricted solely to Heli Skiing operations related to the owners' tourism business and should have had an expiry date. Given the current situation there is absolutely no "public interest" argument to be made about Alpine's operations and there are many Canadian operators ready, willing, and able to carry out the work they are doing. To be blunt, this is just unfair.

NATA urges you to only extend Alpine's exemption for an absolute maximum of one year and only on the basis of a firm commitment to properly comply with Canadian ownership requirements by the end of that period. Without such a commitment and constraint we feel the exemption should be denied.

Sincerely

Stephen Nourse

Executive Director, NATA

c.c. Yaprak Baltacioglu, Deputy Minister of Transport
Isabelle Trépanier, Director, National Air Services Policy
Fred Jones, Helicopter Association of Canada

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