Docket No 20-15, Comments on PVO Financial Responsible Rulemaking

We recognize that your proposed regulations are vital and one small step in the much needed help for protecting the consumer. Guaranteed the cruise lines will utilize their large Legal and PR Departments to object to implementing these proposed changes. It's hard for an us to compete with such polished tactics designed to drown out the fundamental rights an individual consumer should have. However, we think it's important to provide a consumers' view of Holland American Cruise Line's current method of operations in the hope that it provides insight on challenges passengers have without these regulations. Our titanic nightmare has made us very committed to being an active voice in pursuing consumer protections so others will not be subjected to what we've experienced. Both of us are more than willing to submit additional information or discuss directly with the commission as needed. Detailed below is a summary our current experience that has become our Titantic nightmare of a lifetime.

Background:

Months ago we arranged for a "27-day Mediterranean Romance & Spanish Farewell" cruise on Holland America. The revised departure date is currently 10/18/2021.

The trip is substantially different than what we purchased. Holland automatically changed our trip to a different ship, revised the sailing dates (by weeks), revised the port time in Venice from 2 days to only 3 hours (which will consumed by a bus transporting to another port), implemented masks & cancelled stops at ports - all without any compensation from what we originally agreed to pay for. Most recently, Holland requires we purchase their tours in order to even get off the ship. Many of these changes are not the result of COVID.

Issue:

We are currently being stonewalled into selecting 1 of 4 options as follows:

- Cancel our trip and lose well over $7,000;
- Take the Mediterranean cruise but not get off the ship;
- Be held hostage through the required purchase of Holland tours adding thousands of dollars for tours we don't want to go on; or,
- Rebook a future trip with several conditions that significantly lessen the value we've already paid.

Details:

Despite Holland being aware of Italy's requirements for almost 1 month prior, it wasn't until 10/4/2021 we received a generic email checklist with a single sentence (buried 3/4 of the way through) regarding requirement to purchase Holland tours in order to disembark at various ports. We believe many passengers will not notice this new provision when reading a poorly written email. While Holland has taken an exorbitant amount of time despite urgent circumstances, their delay has caused us to incur expenses committing to our own tours, high speed trains and coordination of friends travel.

Holland's approach to requiring passengers purchase the ships tours in order to disembark will result in their substantial income and profit. Considering the number of passengers at a minimum of $100 per tour, multiplied by the # of ports - it is over $500,000 in additional revenue.

Holland had numerous options in order to comply with Italy's requirements. They choose the one that would increase their profit at the expense of the passengers and local businesses. While purchasing a tour from Holland is "optional", it's hard to think passengers would fly all the way to Italy for a Mediterranean cruise and spend the entire trip sitting on the ship. If that was the plan, passengers could have booked the cruise "to nowhere" on NCL.

Not only will Holland substantially increase revenue mandating their tours, the tours are often designed to visit tourist traps & shops that Holland gets an additional kickback in "consideration" for stopping. We believe the local communities dependent on tourist dollars will be very unhappy with Holland's solution for pocketing their source of revenue.

Holland uses the excuse these changes are beyond their control in order to comply with CDC. If Holland is truly concerned with CDC guidelines, why are they not complying with the recent advisory emphasizing travel related to older travelers/those with increased risk? It appears that Holland is picking and choosing which part they comply with, based on benefit to them and not what's in the best interest of the passengers. We are in the highest category of risk and based on recent CDC guidelines, do not believe we can safely travel with Holland. Why should Holland be able to penalize us for compliance with CDC because of our age and disabilities?

The restrictions and various conditions placed on rebooking does not make that option an equal exchange for what we currently have, let alone the fact that Holland has used over $7,000 of our retirement dollars for over 18 months without any interest or consideration whatsoever.

In Summary:

I recognize that Holland are experts on the marketing verbiage used to deflect any responsibility for their decisions. Their strategies and marketing approach utilize tactics that blame COVID as an excuse, bully and intimidate anyone that complains. During our communication, they informed us they are able to go as far as cancelling stops at every port and we would have no recourse. Other than the standard marketing response, our concerns have fallen on deaf ears at Holland and we are being totally ignored. We are hoping that your organization can provide visibility of Holland's actions related to our personal experience, and implement consumer protections in order to help prevent others from taking a trip on the "titanic" that we've been placed on.

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