

WORLDSPAN

QA 27698

October 6, 1997

DEPT. OF TRANSPORTATION
DOCKET SECTION

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OFFICE OF GENERAL COUNSEL

Hon. Nancy E. McFadden, General Counsel
U.S. Department of Transportation
400 Seventh Street, S.W.
Room 10428
Washington, D.C. 20590

Re: Advance Notice of Proposed Rulemaking regarding Computer Reservation System Regulations (Docket No. OST-97-2881) - 3

Dear Ms. McFadden:

WORLDSPAN is in receipt of a copy of a letter written to you by Ms. Sylvia A. de Leon dated September 29, 1997, on behalf of The Sabre Group, requesting a 30-60 day extension of the initial comment period, and a similar 30-60 day extension for reply comments for the Department of Transportation's Advance Notice of Proposed Rulemaking regarding Computer Reservation System Regulations. WORLDSPAN supports The Sabre Group's request.

WORLDSPAN believes that an extended comment period would provide sufficient time to enable interested parties to submit thorough responses and comments to the DOT's Advance Notice, without unduly delaying the rulemaking process. Given the complexity and interrelatedness of the many issues highlighted by the Advance Notice, additional time would facilitate more informed comments.

Thank you in advance for your consideration.

Sincerely,



Douglas Abramson
Vice President, General Counsel & Secretary

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97 OCT 10 PM 3:38

September 29, 1997

BY MESSENGER

Hon. Nancy E. McFadden, General Counsel
U.S. Department of Transportation
400 Seventh Street, S.W.
Room 10428
Washington, D.C. 20590

Re: Computer Reservations System (CRS) Regulations (Docket No. OST-97-2881)

Dear Nancy:

I write to you on behalf of my client, The SABRE Group (SABRE) to request a 30-60 day extension of the initial comment period and a 30-60 day extension of the reply comment period for the Department of Transportation's Advance Notice of Proposed Rulemaking (ANPRM) regarding the computer reservations system (CRS) regulations. Such extensions are fully within your discretion and consistent with the intent of the proposed rulemaking. As you seek to elicit comprehensive responses to the areas of inquiries specified in the ANPRM, we believe that the Department would be the beneficiary of more thorough submissions and the CRS rulemaking process would not be significantly delayed.

Given the tremendous change and growth in global distribution systems and the CRS industry, the addition of significant new competition, and the rapid expansion of travel services on the Internet since the last review of the CRS regulations, the Department faces the complex task of rendering the most important modifications yet to the CRS regulatory structure. In view of the significance of this effort, we believe that an extended comment period is important to provide sufficient time for all interested parties to develop in-depth and truly useful responses to the detailed questions set out in the ANPRM. We believe that the Department would benefit significantly at this early stage from the most thoughtful and complete comments possible, not only from SABRE and other established CRSs, but from many others with valuable insight who may not have been involved in previous CRS rulemakings and may also benefit from more time.

After reviewing cases in which the Department extended the comment periods rulemaking proceedings, we conclude that our request for 30-60 additional days in which to file comments and rely comments is very reasonable. In the Department's proceeding concerning on-time performance by air carriers, for example, the Department granted a 30-day extension to

Hon. Nancy McFadden

September 29, 1997

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submit comments to the Notice of Proposed Rulemaking (NPRM), explaining that such "action serves to facilitate the submission of informed comments, while not unduly delaying the proceeding." (60 Federal Register 35158 (July 6, 1995).) Recently, in the Department's review of rules governing participation in its Disadvantaged Business Enterprises program, the Department extended the comment period on its supplemental notice of proposed rulemaking (SNPRM) for an additional 60 days. The Department indicated that it based its decision in that rulemaking on the importance, length, and complexity of the SNPRM and the significant number of affected parties that would benefit from the additional time. (See 62 Federal Register 38952 (July 21, 1997).)

The reasons cited by the Department in these decisions granting extension requests are equally applicable here. The Department would greatly facilitate the submission of informed comments, not unduly delay the proceeding, and allow more time for the many affected parties given the importance, length, and complexity of this rulemaking.

We urge you to weigh the benefits of more thorough presentations against whatever convenience or short term objectives could possibly be achieved by a shorter comment period. We applaud the Department's effort, as demonstrated by the breadth of the questions in the ANPRM, to undertake a thoughtful review of the regulations covering this constantly evolving industry. The opportunity to review a more appropriate CRS regulatory structure is timely as it coincides with the global expansion of the industry and sweeping changes in global distribution systems.

Thank you for this consideration. We look forward to your response.

Sincerely,

A handwritten signature in black ink, appearing to read "Sylvia A. de Leon". The signature is fluid and cursive, with a long horizontal flourish extending to the right.

Sylvia A. de Leon

cc: Sally Katzen, Administrator, Office of Information and Regulatory Affairs,
Office of Management and Budget