

BEFORE THE
DEPARTMENT OF TRANSPORTATION
WASHINGTON, D.C.

DEPT. OF TRANSPORTATION
DOCKET SECTION

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COMPUTER RESERVATION SYSTEM)
(CRS) REGULATIONS)

Docket OST-97-2881

-28

COMMENTS OF AIR JAMAICA LIMITED

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Dated: December 9, 1997

**BEFORE THE
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COMPUTER RESERVATION SYSTEM)
(CRS) REGULATIONS)

Docket OST-97-2881

COMMENTS OF AIR JAMAICA LIMITED

Pursuant to the Department's request for comments on the Petition for Rulemaking filed by America West Airlines, Inc. ("America West") in Docket OST-97-3014, Air Jamaica Limited ("Air Jamaica") hereby submits these comments in support of America West's proposal to limit computer reservation system ("CRS") vendor charges to booking fees for actual travel and prohibit a CRS vendor from permitting passive bookings on its system at the request of a participating airline.

For the reasons set forth in America West's petition, Air Jamaica fully supports the carrier's request that the Department immediately issue a notice of proposed rulemaking ("NPRM") for two regulations. These regulations would (1) limit CRS pricing practices to charges for bookings that result in actual travel, and (2) enable a participating airline to prohibit CRS vendors from allowing its subscribers to make passive bookings on that airline.

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Issuance of these proposed rules would substantially reduce a participating carrier's distribution expenses by eliminating charges for abusive bookings made by subscribers merely to meet productivity quotas and other incentives. It would also reduce the charges to carriers for booking services which subscribers offer as a special benefit to customers but which provide no benefit to the airline that is forced to pay for them (*e.g.*, duplicate bookings).

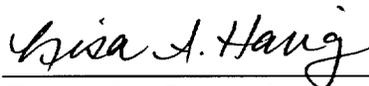
Additionally, the proposed restriction on charges would substantially aid a participating airline in predicting its monthly distribution costs. Elimination of the above-described booking practices would reduce inventory spoilage and overbooking situations which often are a direct result of such practices. Overbooking directly harms an airline's passengers who may be denied boarding as a result thereof, as well as the carrier itself which must pay denied boarding compensation to such passengers.

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WHEREFORE, for the reasons set forth above, Air Jamaica urges the Department to immediately issue an NPRM proposing the rules requested by America West.

Respectfully submitted,



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