

BEFORE THE  
DEPARTMENT OF TRANSPORTATION  
WASHINGTON, D.C.

DEPARTMENT OF TRANSPORTATION  
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DOCKET SECTION

QA 29468

In Re  
Advance Notice of Proposed Rulemaking  
Computer Reservations System Regulations

Docket OST-97-2881-32

**COMMENTS OF AMERICAN AIRLINES, INC.**

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December 9, 1997

BEFORE THE  
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In Re  
Advance Notice of Proposed Rulemaking  
Computer Reservations System Regulations

Docket OST-97-2881

**COMMENTS OF AMERICAN AIRLINES, INC.**

American Airlines, Inc. ("American") respectfully submits the following comments in response to the Advance Notice of Proposed Rulemaking ("the Notice") in Docket OST-97-2881, 62 Fed. Reg. 47606 (September 10, 1997).

**I. INTRODUCTION AND SUMMARY**

American does not oppose continuation of the current rules governing airline computer reservations systems ("the Rules"). The Rules, contained in 14 C.F.R. Part 255, are the result of many hard-fought battles between businesses with competing interests. There is no need to walk again through old battlegrounds. The CRS industry has prospered under the Rules, and CRSs and airlines alike have been able to conform their business practices to the Rules.

Therefore, rather than rehashing settled issues, the Department should focus the upcoming rulemaking on ensuring that the Rules keep pace with industry changes. As the Department's Notice observes, an "important development is the creation of booking sites on the Internet for use by consumers." 62 Fed. Reg. 47608. While the absolute number of on-line bookings is small today, this distribution channel will grow rapidly over the next few years. The Department should update the Rules to reflect the growing significance of this emerging distribution channel. Similarly, the Department should ensure that

the Rules keep pace with changes in CRS ownership and with the new reality of competition between global alliances of airlines sharing designator codes.

To accomplish these objectives, American urges the Department to continue the current Rules, with appropriate revisions. These revisions should:

- Retain the general approach of the existing rules;
- Continue the Department's philosophy of minimal intervention in the free market;
- Ensure that the Rules address the potential for unfair competition and consumer deception in emerging on-line distribution channels; and
- Prohibit multiple displays of a single flight marketed under multiple designator codes.

In addition, the Department should modify its current practice of setting a sunset date after a five-year period, but then extending the Rules for another year or more while the Department studies possible revisions to the Rules. The Department should either ensure that its periodic reviews are completed before the scheduled sunset date, or shorten the effective period of the new Rules to three years. These changes are needed to ensure that the Rules keep pace with the accelerating rate of change in the CRS and airline industries.

## **II. THE RULES SHOULD BE CONTINUED.**

The Department should continue all of the key provisions of the Rules.

### **A. CRSs MUST OFFER NEUTRAL DISPLAYS.**

The requirement that CRSs provide an integrated display which lists flights based on criteria other than carrier identity is the very core of the Rules. If the Rules are to be continued, this provision must be continued, since it most directly prevents consumer deception and unfair competition as a result of "screen bias."

**B. THE MANDATORY PARTICIPATION RULE SHOULD CONTINUE.**

The mandatory participation rule reflects one of the fundamental assumptions about the need for CRS Rules — the assumption that without such a rule, carriers which own systems would refuse to participate in third-party CRSs, or would refuse to participate at the same level in third-party CRSs as they participate in their own CRS.

Except for Southwest Airlines, which relies heavily on direct distribution as opposed to distribution through travel agents, all major U.S. carriers continue to have at least an indirect ownership interest in a CRS. Northwest Airlines, Trans World Airlines, and Delta Air Lines are owners of Worldspan. Continental Airlines is a part owner of Amadeus. United Air Lines and US Airways are owners of Galileo. American no longer has any direct ownership in a CRS, but American's parent, AMR Corporation, owns roughly 80% of The SABRE Group Holdings, Inc. ("TSG").<sup>1</sup>

As the Department said in adopting the final rule in the parity clause rulemaking, the failure of a major U.S. carrier to participate in another CRS, or to participate at the same level as in its own CRS, has long been believed to threaten the ability of a CRS to attract enough travel agent subscribers to compete successfully. Final Rule, Docket OST-96-1145, November 5, 1997, 62 Fed. Reg. 59784. Accordingly, if the Rules are to continue at all, the mandatory participation rule should continue.

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<sup>1</sup> TSG is publicly traded on the New York Stock Exchange. SABRE is one of the operating units of TSG.

**C. THE RULE REQUIRING SYSTEMS TO PROVIDE ACCESS TO MARKETING INFORMATION SHOULD CONTINUE.**

Section 255.10, which requires CRSs to provide carriers with access to marketing and booking information, has made a significant contribution to airline competition, and should be continued. CRS data is more timely than the Department's O&D and service segment data, and airlines use CRS data to identify potential new markets and to match supply to customer demand in existing markets. The net result is that aircraft are better utilized than they would be without the availability of this data. Improved utilization of expensive capital assets in turn results in consumer savings.

**D. THE RULES SHOULD ENSURE THAT U.S. CRSs AND CARRIERS ARE TREATED FAIRLY.**

Question 15 of the Notice states that the overseas marketing efforts of U.S. CRSs have been frustrated by discriminatory conduct by foreign carriers. 62 Fed. Reg. 47610. The Department should ensure that the CRS Rules do not result in unfair prejudice to U.S. carriers and CRSs.

In the United States, foreign carriers enjoy the full protection of the Department's CRS Rules. This protection allows foreign carriers to market their services effectively through participation in U.S. CRSs. When these carriers and their affiliated CRSs engage in conduct in their home countries that disadvantages U.S.-based carriers and CRSs, the Department needs the tools, and the will, to counter such protectionist trade measures. American supports the proposal of The SABRE Group that the Department adopt a rule allowing the Department to order all CRSs marketed in the U.S. to cease displaying and ticketing the flights of a foreign carrier found to have engaged in discriminatory conduct against U.S. carriers or CRSs. Such a rule, if aggressively enforced, will

ensure that U.S. carriers and CRSs find a level playing field when they attempt to compete abroad.

### **III. THE DEPARTMENT SHOULD AVOID DETAILED REGULATION.**

#### **A. BOOKING FEE REGULATION IS UNWARRANTED.**

At least one carrier has proposed that the Rules be expanded to include price regulation of CRS booking fees. Comments of Frontier Airlines, Inc., Docket OST-97-2881, November 24, 1997, pp. 17-19. But if ever there was a "cure" which is far worse than the presumed disease, price regulation of booking fees is it. Regulating these fees will require elaborate rate-setting mechanisms to determine fair rates for the wide variety of services now offered by CRSs. That will likely lead to ever more elaborate rate-making proceedings reminiscent of the now-abandoned approaches to regulation of telephone rates, energy charges and air fares.

There is simply no reason for the Department to create the bureaucracy needed to administer such an onerous regulatory scheme, especially when Congress has directed the Department to place "maximum reliance on competitive market forces and on actual and potential competition...to provide the needed air transportation system," 49 U.S.C. § 40101(a)(6), and at a time when other regulated industries are being deregulated. The Department's judgment in prior rulemakings that "suggested rules on limiting booking fees had serious flaws" remains sound. See 62 Fed. Reg. 47608. The Department should not attempt to regulate booking fees.

#### **B. REGULATION OF CHARGES FOR ALLEGEDLY "UNNECESSARY" TRANSACTIONS IS NOT NEEDED.**

The Department should not attempt to regulate fees for such allegedly valueless transactions as the creation of "open," "passive," and "duplicate"

segments. Valueless or not,<sup>2</sup> these transactions result in costs that must be paid. The question is how they will be paid. Will they be paid as a result of a charge for the allegedly valueless transaction, or will they be paid by CRSs “grossing up” the fees for concededly valuable transactions? Absent comprehensive price regulation, which American strongly opposes, CRSs will find some way to recoup the costs created by allegedly “valueless” transactions.

Of course, there are bound to be travel agencies who create “open,” “passive,” and “duplicate” bookings solely for the purpose of meeting a “productivity” target in their CRS contract. But this is a problem of abuse by an individual travel agency that should be solved by the carriers which the agency represents, not a market imperfection that should be redressed by detailed regulation. As American showed recently in a proceeding initiated by the Association of Retail Travel Agents, (Answer of American Airlines, Inc., Docket OST-97-2908, filed October 15, 1997), travel agents are true agents of carriers. As such, they owe carriers various duties, including a duty to obey a carrier’s instructions. See, e.g., Airline Reporting Corporation Agreement, § 1, ¶ B; Restatement of the Law, Agency, 2d, § 377 (duty to act in accord with contractual promises); Restatement of the Law, Agency, 2d, § 385 (duty to obey reasonable instructions and not to act contrary to principal’s directions). Pursuant to both contract and the common law, carriers are free to take action against agents that violate these duties. Airline Reporting Corporation, Industry Agents’ Handbook, §§ VII(H), XXIX(E) (October 1996). Therefore, before the Department resorts to detailed regulation of CRS charges, it should require a clear showing

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<sup>2</sup> At times, these transactions reflect a traveler’s genuine intention to travel. For example, “passive” bookings, which do not remove seats from a carrier’s inventory, may simply reflect a travel agent’s issuance of a ticket to a traveler who made a reservation directly with a carrier.

that carriers lack adequate legal remedies to curb abuses by the agencies which represent them.

**C. THE DEPARTMENT SHOULD NOT FURTHER REGULATE DISPLAY ALGORITHMS.**

The Department recently adopted a Final Rule creating two new rules relating to CRS displays. 62 Fed. Reg. 63837. The Department left open, however, whether it should adopt another rule that CRS displays be “rationally related” to consumer preferences, and said that it would consider that proposal further in this proceeding. *Id.* As American commented in Docket OST-96-1639, further regulation in this area is not warranted. See Comments of American Airlines, Inc., Docket OST 96-1639, filed October 15, 1996. CRSs have strong market incentives to offer displays that reflect consumer preferences. Further, the Department’s proposed “rationally related” standard is so vague that it will prove unworkable in practice.

**D. IF THE ANTI-TYING RULE IS CONTINUED, IT SHOULD BE ENFORCED.**

In Question 14 of the Notice, the Department asked whether some carriers coerce travel agencies at their hubs into using the CRS affiliated with that carrier. 62 Fed. Reg. 47610. Section 255.8 of the Rules bars system owners from tying the sale of transportation to the use of a particular CRS. American strives to abide by Section 255.8 at all times, but it is regularly told that many carriers do not. Many in the industry believe that the anti-tying rule is followed mainly in the breach, because of a lack of effective enforcement by the Department.

A rule that is widely ignored is worse than no rule at all. By failing to detect and take actions against carriers that disregard the anti-tying rule, the Department is punishing the virtuous and rewarding the dishonest. This should

hardly be the purpose or effect of the CRS Rules, and the Department should either develop an effective enforcement mechanism for the anti-tying rule or abandon it.

#### **IV. THE RULES SHOULD BE EXPANDED TO COVER THE ON-LINE DISTRIBUTION OF AIR TRAVEL.**

When the CRS Rules were first adopted in 1984, personal computers were brand new, Microsoft was a small, single-product company, and the World Wide Web was not even a programmer's development project. Today, American and other carriers are installing power outlets in aircraft seats for the laptop PCs carried by travelers on virtually every flight, Microsoft is a \$15 billion company, and millions of Americans log on to the Internet to gather news, communicate via e-mail and electronic "chat rooms," and shop. Consumer on-line travel spending is projected to increase to \$8.9 billion per year within five years.<sup>3</sup>

As one might expect, a potential \$8 billion industry attracts a lot of interest. Airlines, CRSs and travel agents all sponsor websites or dial-up on-line services. American's website is at [www.americanair.com](http://www.americanair.com); its dial-up service is AAccess. SABRE's website is Travelocity at [www.travelocity.com](http://www.travelocity.com), and its dial-up service is EasySABRE. American Express, the world's largest travel agency, offers travel services via its website at [www.americanexpress.com](http://www.americanexpress.com).

In addition to the on-line offerings of traditional travel industry companies, a number of other businesses have entered the travel distribution business. Examples of sites offered by these new entrants are:

- Microsoft Corporation's Expedia ([www.expedia.com](http://www.expedia.com));
- America Online's Preview Travel ([www.previewtravel.com](http://www.previewtravel.com)); and
- Internet Travel Network ([www.itn.com](http://www.itn.com)).

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<sup>3</sup> Jupiter Communications, *Online Travel Market: Five Year Outlook (Draft)*, at 56 (April 1997).

All of these so-called “mega-sites” offer low-fare finders, currency converters, maps, weather reports, information on destinations, and more. Each purports to offer comprehensive and unbiased carrier-related fare and schedule information. And each relies on a CRS as the “booking engine” for reserving and purchasing air travel.

The array of services offered by these sites is stunning. Many websites offer special discount fares only to registered on-line consumers — American, for example, now has over 1.1 million subscribers to its NetSAAvers fare service. Cathay Pacific has held Internet auctions in which registered “CyberTravelers” bid frequent flyer miles for tickets. Both American and Northwest have run promotions with Microsoft’s Expedia service. There is no way to appreciate the full breadth of the on-line services, and the rate at which they change, other than to “go on-line” and peruse them. American lists a number of travel-related websites in Appendix A, and encourages the Department to devote the time necessary to gain an understanding and appreciation of the significance of this emerging method of distributing travel, and the great promise it holds for low-cost, efficient distribution of air transportation services to consumers.

Just as this emerging distribution channel presents enormous promise, it also presents challenges. Already, practices have appeared on the Internet that would not be tolerated if they were done by a CRS. For example, in apparent protest of commission changes announced by United Air Lines earlier this year, American Express removed United flight listings from the American Express website.

Clearly the Department’s Rules would not allow a carrier to cause its affiliated CRS to delist the flights of a competing carrier. So why should the Department allow American Express, or Microsoft, or Preview Travel to delist a carrier’s flights? What basis can there be for CRS Rules that constrain some

providers of purportedly neutral travel information, but not others? Display bias is the same regardless whether it is the result of system ownership, retaliatory conduct, or a "promotional" fee paid by a carrier to a Microsoft or a Preview Travel.

Before the Rules were enacted, carriers could, by owning a CRS, cause it to bias displays. Today, carriers can "buy" preferential display in on-line travel sites. This leads to two problems. First, unless the Rules are updated to cover on-line commerce, there will be a repeat of the early 1980's, except the potential for harm is worse. At least in the 1980's, the direct users of biased displays were trained travel agents that worked with CRS displays all day long, knew of the bias in the displays, and knew to check whether other options were available. Few direct consumers are likely to spend 40 hours per week looking at on-line travel displays, and many are unlikely to have the time or experience that travel agents have to counter the effects of a biased display. Second, continuing the Rules without updating them will cause some providers of travel information to be shackled by regulation, but will allow others to compete unfettered.

Accordingly, the Department should reevaluate the jurisdictional basis for the Rules, and update them to apply to all providers of purportedly neutral fare and schedule information, regardless of whether the information is provided by screen displays to travel agents, by computer display to a prospective traveler, or by some other means. Of course, the Department should not extend the Rules to on-line sites that do not purport to offer unbiased information relating to competing carriers. The classic example is the website offered by a single carrier. For all practical purposes, a consumer logging on to a single-carrier website is effectively contacting that carrier's reservations service. Thus, even though American sells not only its own services via the American Airlines website, but also the services of competing carriers, consumers are hardly likely

to think that American would program its own website to be neutral as between American flights and United flights.

Finally, the Department should not restrict anyone's ability to offer users software, hardware or other tools for altering displays in accordance with users' desires.

**V. THE RULES SHOULD ADDRESS POTENTIAL CONSUMER DECEPTION AND UNFAIR COMPETITION AS A RESULT OF CODESHARING.**

Alliances between carriers are far more common than they were when the Rules were last revised. Since 1992, the Department has granted approval to dozens of code-sharing relationships between U.S. and foreign carriers. In addition, the Department has granted antitrust immunity to six major airline alliances:

- Northwest/KLM (Order 93-1-11, Docket 48342, January 11, 1993);
- American/Canadian (Order 96-7-21, Docket OST 96-792, July 15, 1996);
- United/Lufthansa (Order 96-5-27, Docket OST 96-1116, May 20, 1996);
- Delta/Swissair/Sabena/Austrian (Order 96-6-33, Docket OST-95-618, June 17, 1996);
- United/SAS (Order 96-11-1, Docket OST 96-1411, November 1, 1996); and
- United/Air Canada (Order 97-9-21, Docket OST 96-1434, September 19, 1997).

Further, in a clear preview to the future of global airline competition, the United group of carriers have begun marketing their collective services under the "Star Alliance" moniker.

The Department has vigorously endorsed such arrangements as procompetitive means of delivering a variety of consumer benefits. See, e.g.,

U.S. International Air Transportation Policy Statement, 60 Fed. Reg. 21841, May 3, 1995. But there is no consumer benefit to the multiple display of the same flight. Indeed, the multiple display of a single flight has an anticompetitive effect — it frequently removes from the view of the travel agent or consumer a competitive alternative to the multiple listed flight.

For example, consider the following Galileo displays of flights from Phoenix, Arizona (PHX) to Frankfurt (FRA) on January 27, 1998:

1+	UA1138	F9	Y9	B9	M9	H9	Q9	V9	W9	S9	T9+	PHXORD0805	1216	757	80
2+	LH6503	F4	C4	D4	H4	B4	L4	G4	Y4	T4	W4	FRA1420	0600	+763*	0
3+	UA1138	F9	Y9	B9	M9	H9	Q9	V9	W9	S9	T0+	PHXORD0805	1216	757	80
4+	UA 944	F9	C9	D9	Y9	B9	M9	H9	Q9	V9	W9+	FRA1420	0600	+763	0
5	TZ 751	Y7	H4	L4	M4	B4	K4	Q4				PHXJFK0800	1600	72S	1
6+	LH 401	F4	C4	D4	H4	B4	L4	G4	Y4	T4	W4	FRA1730	0655	+343	0
7	TZ 751	Y7	H4	L4	M4	B4	K4	Q4				PHXJFK0800	1600	72S	1
8+	UA3516	F4	C4	D0	Y4	B4	M4	H4	Q4	V4	W0+	FRA1730	0655	+340*	0

1*	AA 526	F7	Y7	W7	B7	H7	M7	K7	Q7	V7	G7	PHXORD0752	1214	M80	90
2+	LH6503	F4	C4	D4	H4	B4	L4	G4	Y4	T4	W4	FRA1420	0600	+763*	0
3*	AA 526	F7	Y7	W7	B7	H7	M7	K7	Q7	V7	G7	PHXORD0752	1214	M80	90
4+	UA 944	F9	C9	D9	Y9	B9	M9	H9	Q9	V9	W9+	FRA1420	0600	+763	0
5*	AC 686	J9	C9	Y9	M9	B9	H9	V9	Q9	L9		PHXYYZ0805	1410	320	0
6*	AC 872	J9	C9	Y9	M9	B9	H9	V9	Q9	L9		FRA1800	0715	+747	0
7	AC 686	J9	C9	Y9	M9	B9	H9	V9	Q9	L9		PHXYYZ0805	1410	320	0
8+	LH6841	C4	D4	H4	B4	L4	G4	Y4	T4	W4		FRA1800	0715	+747*	0

1*	AA1780	F7	Y7	W7	B7	H7	M7	K7	Q7	V7	G7	PHXDFW0820	1138	M80	NO
2*	AA 70	F7	C7	Y7	W7	B7	H7	M7	K7	Q7	V7+	FRA1435	0740	+763	0
3+	UA1138	F9	Y9	B9	M9	H9	Q9	V9	W9	S9	T0+	PHXORD0805	1216	757	80
4+	UA3500	F4	C4	D0	Y4	B4	M4	H4	Q4	V4	W0+	FRA1625	0735	+747*	0
5*	AA 526	F7	Y7	W7	B7	H7	M7	K7	Q7	V7	G7	PHXORD0752	1214	M80	90
6*	AA 84	F7	C7	Y7	W7	B7	H7	M7	K7	Q7	V7+	FRA1625	0810	+763	0
7	DL1970	F7	Y7	B7	M7	K7	L7	H7	Q7	A4		PHXCVG0815	1334	72S	NO
8+	DL 48	F7	C7	D4	Y7	B7	M7	K7	L7	H7	Q7+	FRA1900	0915	+M11	0

Two full screens are consumed by just four options. American's competitive transatlantic flight does not appear until the third screen. But for the multiple listing of codeshare flights, American's flight would appear on the second screen.

Multiple listing results in the same problem caused by CRS display bias prohibited under the Rules — competitive alternatives are listed lower on the

screen, or not until the second screen, and therefore are less likely to be sold. To redress this problem, the Department should adopt a rule prohibiting multiple display of codeshare flights. Under such a rule, operating and codeshare flights would not be displayed separately. Multiple codes may be shown, but the codes would have to be shown together in a single listing of the flight, as in the following example from a SABRE display:

```
NW/KL  8664  J4  C4  Y4  B4  MSPAMS  930P  1220P#1  747  HB  0  DCA
                M4  H4  Q4  V4
```

CRSs would permit the sale of either the codeshare flight or the operating flight from the single line displayed in the CRS. This rule will allow competitive services that would otherwise be displayed on later screens, to be displayed on the same screen as the codeshare service.

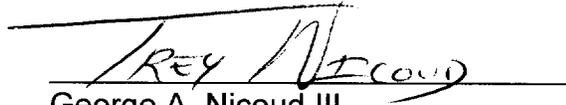
Further, to ensure consumers are fully advised exactly what carrier is operating the flight being booked, American proposes that the Department adopt a rule requiring the unambiguous disclosure of the identity of the operating carrier in: the initial schedule or availability display; any “time of sell” display; the customer’s Passenger Name Record; any customer documentation (such as an itinerary, invoice or confirmation of a ticketless booking); and the boarding pass. Such a rule will help ensure that consumers know what they are buying, and make more fully-informed choices.

## **VII. CONCLUSION**

The basic structure of the CRS Rules is sound, and should be continued. The principal challenge facing the Department, and the CRS and airline industries, is to adapt to the dramatic changes now occurring. Most important, the Department must update the Rules to cover new methods of electronic distribution of travel services. The failure to do so is likely to lead to substantial

consumer deception and harm, and is certain to lead to some competitors being unfairly hobbled in their ability to compete.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "George A. Nicoud III", is written over a horizontal line.

George A. Nicoud III  
Attorney  
American Airlines, Inc.

December 9, 1997

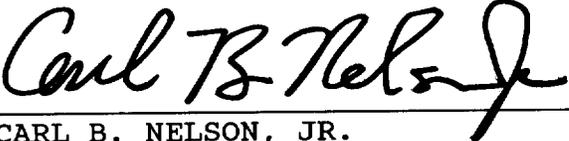
## Appendix A

American Airlines	<a href="http://www.americanair.com">www.americanair.com</a>
American Express	<a href="http://www.americanexpress.com/travel/">www.americanexpress.com/travel/</a>
Atevo Travel	<a href="http://www.atevo.com">www.atevo.com</a>
Best Fares	<a href="http://www.bestfares.com">www.bestfares.com</a>
Biztravel.com	<a href="http://www.biztravel.com">www.biztravel.com</a>
Continental Airlines	<a href="http://www.flycontinental.com">www.flycontinental.com</a>
CNN	<a href="http://www.cnn.com/Travel">www.cnn.com/Travel</a> and <a href="http://www.reservationdesk.com">www.reservationdesk.com</a>
Delta Air Lines	<a href="http://www.delta-air.com">www.delta-air.com</a>
Excite Travel	<a href="http://city.net">city.net</a>
Flifo	<a href="http://www.flifo.com">www.flifo.com</a>
Global Online Travel	<a href="http://www.got.com">www.got.com</a>
Internet Travel Network	<a href="http://www.itn.net">www.itn.net</a>
Microsoft Expedia	<a href="http://www.expedia.com">www.expedia.com</a>
Outtahere	<a href="http://www.outtahere.com">www.outtahere.com</a>
Preview Travel	<a href="http://www.previewtravel.com">www.previewtravel.com</a>
Southwest Airlines	<a href="http://www.iflyswa.com">www.iflyswa.com</a>
US Airways	<a href="http://www.usairways.com">www.usairways.com</a>
TheTrip.com	<a href="http://www.thetrip.com">www.thetrip.com</a>
Travelocity	<a href="http://www.travelocity.com">www.travelocity.com</a>
TravelWeb	<a href="http://www.travelweb.com">www.travelweb.com</a>
TWA	<a href="http://www.twa.com">www.twa.com</a>
Uniglobe Travel Online	<a href="http://www.uniglobe.com">www.uniglobe.com</a>
United Air Lines	<a href="http://www.ual.com">www.ual.com</a>

Additional air travel related websites are indexed at [http://www.yahoo.com/Recreation/Travel/Air\\_Travel/](http://www.yahoo.com/Recreation/Travel/Air_Travel/).

CERTIFICATE OF SERVICE

I hereby certify that I have this day served the foregoing comments by first-class mail on all persons named on the attached service list.

  
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