



Airport Ground Transportation Association, Inc.

DEPARTMENT OF TRANSPORTATION
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QA

DOCKET SECTION

OST-97-2881-41

Room PL-401
Docket 49812
D.O.T.
400 7th Street, SW
Washington, D.C. 20590

Re: Proposed Rules: Computer Reservations System (CRS) Regulations

The Airport Ground Transportation Association is a trade association consisting of over four hundred (400) members, including U.S. airports, intermodal ground transportation providers, local regulators and industry suppliers. Our purpose in commenting on the continuance of CRS regulations is to encourage the D.O.T. to broaden the definition of airline competition to include scheduled intermodal ground transportation.

Currently, in order for an airport ground transportation provider to be listed as providing scheduled service between two airports or from a major airport to nearby cities, they need a co-listing with an airline presently participating in the CRS system. While feasible, as in the recent ValueJet/Greyhound service(s) to Macon, Georgia; Dalton, Georgia; and Chattanooga, Tennessee via Atlanta, such agreements are difficult to put into place.

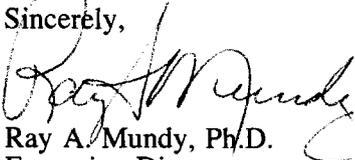
A far more effective and consumer-oriented approach would be to permit individual linehaul bus and van companies to list their connections to and from airports and the cities they serve, including their timetables and rates, within the airline section of CRS. Larger firms, such as Greyhound, Coach USA, Tri-State Bus, VanGelder/Alco Bus, etc. have and would work out interline ticketing and promotional agreements. Smaller operators, however, for the time being would probably just list their services and provide either walk-up ticketing or advance ticketing using an 800 number and/or internet access.

Either way, the listing of scheduled intermodal ground transportation along with scheduled airline service to airports and communities served would broaden the airline traveler's choice of airports to use in reaching a particular destination. For example, airline travelers could choose the most economical or time sensitive mode of travel to their destination -- either all air or air/ground. Often the intermodal combination of air/ground will be more convenient and significantly less expensive for trips where the community served may be 100 or fewer miles from the major hub airport serving the region.

Specifically, we ask that you consider broadening your definition of participating airlines to include participating scheduled airport ground transportation that provides competing service to destinations commonly served by scheduled airlines. Such a broadening would greatly enhance competition, provide travelers an alternative to uncomfortable smaller aircraft and, due to significantly lower cost per seat per mile, extend intermodal transportation to more and more people, thereby expanding aviation travel in general.

Your consideration of this proposal is greatly appreciated. If you plan to have further public comments, hearings, or desire to discuss this matter further, please do not hesitate to contact me. I would be most willing to meet personally with your staff, or assemble a group of intermodal ground transportation providers to expand upon these concepts.

Sincerely,


Ray A. Mundy, Ph.D.
Executive Director

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