

BEFORE THE
U.S. DEPARTMENT OF TRANSPORTATION
WASHINGTON, D.C.

DEPARTMENT OF TRANSPORTATION
97 DEC -9 PM 4: 58
DOCKET SECTION

QA 29504

Petition of

AMERICA WEST AIRLINES

for amendment of the Department's
Economic Regulations to limit CRS
Vendor Charges to Booking Fees for
Actual Travel and Permit Termination of
Passive Bookings by Participating Carriers

Docket No. OST-97-2881 - 50

Advanced Notice of Proposed Rulemaking

COMPUTER RESERVATION SYSTEM
(CRS)
REGULATIONS

COMMENTS OF SOUND TECHNOLOGIES, INC.

Communications regarding this document should be addressed to:

Stanley E. Ansin
President
Sound Technologies, Inc.
1940 116th Avenue, N.E. Suite 15
Bellevue, WA 98004
206-462-5208

Joanne W. Young
David M. Kirstein
Baker & Hostetler, LLP
1050 Connecticut Ave, N.W.
Suite 1100
Washington, D.C. 20036
202-861-1532

December 9, 1997

37pgs.

**BEFORE THE
U.S. DEPARTMENT OF TRANSPORTATION
WASHINGTON, D.C.**

**Petition of
AMERICA WEST AIRLINES**

**for amendment of the Department's
Economic Regulations to limit CRS Vendor
Charges to Booking Fees for Actual Travel
and Permit Termination of Passive Bookings
by Participating Carriers**

Docket No. OST-97-2881

Advanced Notice of Proposed Rulemaking

**COMPUTER RESERVATION SYSTEM
(CRS)
REGULATIONS**

COMMENTS OF SOUND TECHNOLOGIES, INC.

Sound Technologies, Inc. files these comments in support of the Petition for Rulemaking filed by America West Airlines, Inc. proposing two new rules to amend the Department's Computer Reservation System (CRS) rules (14 CFR Part 255). Sound Technologies, which is an independent auditing firm that specializes in auditing of CRS BIDT tapes for airlines, fully supports America West's request that the Department issue a notice of proposed rulemaking for two regulations that would (1) limit CRS pricing practices to charges for bookings that result in

actual travel and thus prohibit transaction based pricing; and (2) enable a participating airline to prohibit CRS vendors from allowing their subscribers to make passive bookings on that airline. Sound Technologies urges the Department to act under its statutory authority to prohibit unfair methods of competition and unfair and deceptive practices in the marketing of air transportation (49 U.S.C. §41712) and adopt these rules which would save participating carriers millions of dollars in excessive booking fees and dramatically reduce abusive bookings which lead to inventory spoilage and overbooking situations, thus directly harming consumers.

I. ANALYSIS OF CRS BOOKING RECORDS SHOW PARTICIPATING CARRIERS ARE BEING CHARGED FOR NUMEROUS IMPROPER BOOKINGS.

Since it was founded in 1992 Sound Technologies, Inc. has assisted numerous airlines through the auditing of CRS BIDT tapes. The firm's principals have extensive experience in public accounting systems, computer sciences and airline marketing, which has provided them with a sophisticated understanding of CRS practices. The auditing software which Sound Technologies has developed establishes various parameters which isolate transactions typically associated with ticketing abuses such as fictitious, duplicate, speculative, high net (churning),

or passive bookings.¹ This auditing process enables carriers to track CRS bookings and determine which bookings do not relate to an intent by a passenger to travel on the airline. Carriers are also able to analyze CRS booking charges for routes or flights which they do not even operate. Based on the auditing experience of Sound Technologies which covers numerous U.S. and foreign carriers, both large and small, it is apparent the CRSs use their market power to impose fee structures that create a financial reward for the CRS owners as a result of speculative and other improper bookings by travel agents. As the Department just noted in the final parity clause rule, CRSs "do not compete for airline participation and their prices and terms for participation are not disciplined by market forces." 62 Fed. Reg. 59785, November 5, 1997. Thus, the vendors have absolutely no financial incentive to deter these bookings. Rather, they encourage these practices directly through productivity and incentive agreements and indirectly by failing to provide adequate system training to subscribers.

¹ America West identified in its petition six categories of abusive practices which have cost participating carriers millions of dollars in booking fees since the introduction by CRSs of transaction based pricing. These practices are: (1) passive segments where no message is sent to the carrier's internal reservation system and are used to sell seats at fares that are no longer available or to issue a ticket for a higher level of service at a below tariff fare; (2) HK segments which are created when agents use a response code reserved for use by the CRS or the carrier, causing a carrier's internal reservation system to create duplicate reservations; (3) group passives which agents use to create high productivity credits when there are in fact no actual passengers; (4) high net cancellations (churning) where the agent engages in multiple bookings and cancellations of a ticket to extend payment of a deadline or hold a ticket out of inventory for a customer; (5) duplicate bookings where the same passenger is booked for more than one seat on the same flight or on multiple flights at the same time; (6) fictitious names which is a form of speculative booking used by agents to hold seats out of inventory which may never result in a sale and which may be coupled with churning.

In this connection, Sound Technologies recommends that the Department establish rules of conduct to mandate that CRS vendors provide adequate training and programs for continued education to their subscribers. As the Department has noted in its studies on CRSs, travel agents engage in these unfair and deceptive booking practices to obtain free or reduced charges for their CRS equipment based on productivity and incentive agreements designed by the CRS vendors to maximize the use of their systems. See Department of Transportation, [Airline Marketing Practices: Travel Agencies, Frequent Flyer Programs and Computer Reservations Systems](#) at 14, 23 (Feb. 1990).

Sound Technologies provides its services to a substantial number of carriers that reflect a cross-section of the industry from major international airlines to small regional carriers. Accordingly, it has been in a unique position to witness the extent to which CRSs charge airlines for abusive booking transactions. Based on the overall audit experience of these carriers, Sound Technologies is convinced that millions of dollars of carrier segment fee costs constitute payment for these improper bookings which provide no value to the carriers. As detailed in the America West Petition these practices also have a devastating effect on inventory by taking available seats off the market which in turn deprives the airlines of revenue, and by creating overbooking situations, which impose financial penalties on carriers and disrupt passenger travel.

Attached as Exhibits 1-7 is documentation which reflects examples of these abuses, such as, the fraudulent use of Passive Segments to obtain productivity incentives, high net costs (churning) and fictitious and suspect passenger names. In addition, Exhibit 6 demonstrates how

the CRS vendors are violating the "adequate" information rules set forth in Part 255 of the Department's Economic Regulations published on December 12, 1992. These violations include the lack of flight numbers and flight dates; and the lack of ARC numbers to properly identify the CRS subscriber.

Moreover, as America West explained in its petition, consumers are increasingly booking and cancelling reservations via multi-carrier Internet booking sites as they look for the best deals, make tentative bookings or simply play with the systems. These consumers may generally be unaware that these booking sites are linked to CRSs or that the airlines are paying a fee for each transaction. High net charges are thus becoming a major problem on Internet bookings.² In addition airlines have suffered from a larger percent of no show passengers from Internet bookings, which results in inventory spoilage. As pointed out by America West, the rapid expansion of CRS-based Internet booking engines compels immediate action by the Department to impose a travel based fee system.

II. THE MARKET POWER HELD BY THE CRSs ENABLES THEM TO REJECT VIRTUALLY ALL CARRIER CLAIMS OF IMPROPER BOOKING CHARGES.

CRS conduct toward participating carriers which attempt to challenge charges for these unfair and deceptive booking practices illustrates and underscores the immediate need for America West's proposed rules. First, the carriers must accept the agreements the CRS vendors utilize if they wish to participate in the systems. As the Department has noted, "participating

² Indeed, it is interesting to note that SABRE imposed its cancellation charge policy at the time Travelocity went on-line. Many of Sound Technologies airline clients have experienced an unusually large percentage of cancellations on bookings originating through the Internet.

carriers have no ability to bargain over the terms of their participation agreements." Computer Reservations System (CRS) Regulations, 57 Fed. Reg. 43780, 43819 (September 22, 1992), hereinafter 1992 Final Rule. Furthermore, although these participation agreements provide procedures for a carrier to dispute an invoice, the CRSs have established unilateral credit request guidelines that fail to recognize most forms of improper bookings as a basis for refund. For example, SABRE's "Handbook" of unilaterally imposed rules authorizes a credit only for a wrong flight number, flight dates or an invalid city pair and insists on full payment for all other booked segments.

This practice by the CRSs is made possible only by the market power the vendors exercise over the participating carriers. In a competitive environment, no carrier would agree to pay for transactions which do not produce revenue and, in many cases, lead to lost revenue and disruption of passenger trips. The position of the CRSs is patently inconsistent with the intent of the Department's rules which were amended in 1992 to require that CRSs make available the BIDT tapes so that carriers could analyze CRS charges and challenge fees for speculative and other bogus bookings. Using the information from these tapes, Sound Technology clients have submitted complete detailed documentation, segment by segment, both on paper and electronic media, supporting claims for invalid bookings. Carriers are frequently under pressure to submit their claims within a relatively short period of time, since the participation agreements typically specify claims must be submitted within a six or twelve month period. However, even though CRSs insist carriers submit very detailed claims, they typically review less than 2% of the documentation submitted, and invariably contend the carriers'

documentation is insufficient and insist on immediate payment. If the airline requests the CRS perform a proper review and analysis of the completely documented disputed segment data, its request is refused. Attempts by participating carriers to meet and resolve disputed invoices are generally met with unrealistic demands for information and unprofessional treatment of the airline employees.³

Sound Technology's experience has revealed that the eventual credit provided by CRS vendors to qualified disputed segments is between 1 and 3%. Moreover, if the carrier does not immediately pay the amount demanded by the CRS, it is threatened with immediate expulsion from the system which, as the Department has repeatedly found, would be catastrophic for an airline.⁴ Sound Technologies is aware of a number of specific instances where a client airline was threatened by CRS vendors for expulsion from their system, and has observed that CRSs are particularly aggressive towards small carriers which occupy even weaker bargaining positions. For this reason, Sound Technologies strongly urges the Department to establish rules of conduct that would impose a general requirement of good faith and fair dealing on all transactions between the CRS vendors and the participating carriers.

³ SABRE actually asserted in a letter dated March 17, 1997 to the Department's General Counsel that 14 C.F.R. § 255.11 which was imposed to allow CRSs not to serve a free riding carrier which fails to pay a non-discriminatory fee, forces SABRE to cut off service to a carrier that has signed a participation agreement and is paying fees but withholding disputed amounts through the clearinghouse. Neither the text of the rule, nor its history as set forth in 49 *Fed. Reg.* 11,668 supports SABRE's self-serving interpretation of this rule. Sound Technologies requests that the Department clarify that this rule does not justify termination over a billing dispute.

⁴ Computer Reservations System (CRS) Regulations, 56 Fed. Reg. 12586, 12595 (proposed March 26, 1991); 1992 Final Rule, *supra*, at 43783-4.

Issuance of the America West proposed rule to limit CRSs to a single fee per segment based on actual travel as reflected in carrier boarding records would directly benefit competition in air transportation by immediately reducing participating carrier distribution expenses through elimination of charges for bookings made by subscribers to meet productivity quotas and other incentives. In addition, this restriction on charges would substantially aid participating airlines in predicting their monthly distribution costs and reduce the current costs associated with monitoring booking charges and seeking to resolve these issues with the CRSs. Significantly, elimination of these practices would also reduce the direct costs and loss of customer goodwill associated with inventory spoilage and overbooking situations which are a direct result of these booking practices and which directly harm airline passengers. In conjunction with America West's proposal, Sound Technologies recommends that the Department impose a rule that would prohibit CRS vendors from providing productivity and incentive arrangements based on any criteria other than actual passenger travel by passengers booked by the agency. At a minimum, the CRSs should be required to desist from advising their subscribers how to achieve levels of required productivity and incentives by utilizing fraudulent booking methods and affirmatively warn agents that such conduct will result in termination of the subscriber agreement.

CONCLUSION

It is imperative that the Department immediately take action to help carriers counter the abusive booking phenomena. This action is compelled by the purpose of the CRS regulations, which is to:

**Sound Technologies, Inc.
Comments to Department of Transportation**

Exhibit of Example of the Use of Passive Bookings

The attached reports reflect an example of the use of Passive Segments. The report on Debonair Travel is in two parts. The first report reflects all segments booked and canceled by Class of Service and by Status Code. Please note that this agency only booked Passive Segments (GK).

The other reports show all segments booked by the agency in detail in the month of June, 1996. Please note that this agency only booked one flight #112 on alternate date 7/3/96 and 7/10/96. The itinerary was from LIM (Lima) to /BOG(Bogata) and from LIM (Lima) to CCS (Caracas). By this means that this agency booked 980 passengers on the two flights. The capacity of the aircraft used by the Airline was a small aircraft seating 20 passengers.

We have also attached a second month, July, 1996 which shows how they used a fictitious passenger name (Smith) to accomplish similar booking activity.

This agency did the same to five other airlines and the CRS Vendor, SABRE was notified and at this date continues to be studying the activity of Debonair Travel.

Sound Technologies Inc. CRSAUDIT Version 4.2 - Wed Sep 25 10:23:28 1996

SANTA AIRLINES

Sabre - Agency Summary Report

JUNE 1996

US 4550188	Q4B2	DEBONIAR TRAVEL INC. @ HOUSTON			TX
	ST	Y B	1960	5056.80	
		Totals:	1960	5056.80	
		Agency Totals:	1960	5056.80	

Agency Status Distribution

US 4550188	Q4B2	DEBONIAR TRAVEL INC. @ HOUSTON			TX
	GK	B	1960	5056.80	
		Totals:	1960	5056.80	
		Agency Totals:	1960	5056.80	

Sound Technologies Inc. CRSAUDIT Version 4.2 - Wed Sep 25 10:23:32 1996

SAETA AIRLINES

Sabre Detail for Pseudo City Code Q4B2

JUNE 1996

(US - DEBONJAR TRAVEL INC.)

Flt	CityPr	SgDate	Passenger Name	Segs	Cost	Cl	Stat	Acc	TrDate	Locatr
0112	LIMBOG	960703	ABELLA/C/D/	4	10.32	Y B	GK GK	ST	960607	QTJPAS
0112	LIMCCS	960710	ABELLA/C/D/	4	10.32	Y B	GK GK	ST	960607	QTJPAS
0112	LIMBOG	960703	AGUADA/X/C/	4	10.32	Y B	GK GK	ST	960607	QTWQLI
0112	LIMCCS	960710	AGUADA/X/C/	4	10.32	Y B	GK GK	ST	960607	QTWQLI
0112	LIMBOG	960703	AGUDILLA/X/	4	10.32	Y B	GK GK	ST	960607	QTVFAC
0112	LIMCCS	960710	AGUDILLA/X/	4	10.32	Y B	GK GK	ST	960607	QTVFAC
0112	LIMBOG	960703	ALEJANDRO/X	4	10.32	Y B	GK GK	ST	960610	QYMPZF
0112	LIMCCS	960710	ALEJANDRO/X	4	10.32	Y B	GK GK	ST	960610	QYMPZF
0112	LIMBOG	960703	ALTO/C/D/E/	4	10.32	Y B	GK GK	ST	960612	QMYGK
0112	LIMCCS	960710	ALTO/C/D/E/	4	10.32	Y B	GK GK	ST	960612	QMYGK
0112	LIMBOG	960703	ALVAREZ/J/J	4	10.32	Y B	GK GK	ST	960607	QTJUER
0112	LIMCCS	960710	ALVAREZ/J/J	4	10.32	Y B	GK GK	ST	960607	QTJUER
0112	LIMBOG	960703	ANDALUCIA/X	4	10.32	Y B	GK GK	ST	960612	QMYCZD
0112	LIMCCS	960710	ANDALUCIA/X	4	10.32	Y B	GK GK	ST	960612	QMYCZD
0112	LIMBOG	960703	APONTE/A/A/	4	10.32	Y B	GK GK	ST	960607	QTKFAV
0112	LIMCCS	960710	APONTE/A/A/	4	10.32	Y B	GK GK	ST	960607	QTKFAV
0112	LIMBOG	960703	APPLES/C/V/	4	10.32	Y B	GK GK	ST	960607	QTXZQW
0112	LIMCCS	960710	APPLES/C/V/	4	10.32	Y B	GK GK	ST	960607	QTXZQW
0112	LIMBOG	960703	BALOG/X/C/V	4	10.32	Y B	GK GK	ST	960607	QTXUIV
0112	LIMCCS	960710	BALOG/X/C/V	4	10.32	Y B	GK GK	ST	960607	QTXUIV
0112	LIMBOG	960703	BARNEY/C/V/	4	10.32	Y B	GK GK	ST	960610	QYNXXG
0112	LIMCCS	960710	BARNEY/C/V/	4	10.32	Y B	GK GK	ST	960610	QYNXXG
0112	LIMBOG	960703	BENTLEY/C/D	4	10.32	Y B	GK GK	ST	960610	QZGHZQ
0112	LIMCCS	960710	BENTLEY/C/D	4	10.32	Y B	GK GK	ST	960610	QZGHZQ
0112	LIMBOG	960703	BERKELEY/C/	4	10.32	Y B	GK GK	ST	960607	QTSHTNT
0112	LIMCCS	960710	BERKELEY/C/	4	10.32	Y B	GK GK	ST	960607	QTSHTNT
0112	LIMBOG	960703	BERLEY/C/V/	4	10.32	Y B	GK GK	ST	960607	QTMAKH
0112	LIMCCS	960710	BERLEY/C/V/	4	10.32	Y B	GK GK	ST	960607	QTMAKH
0112	LIMBOG	960703	BERT/B/N/J/	4	10.32	Y B	GK GK	ST	960612	RSRZEU
0112	LIMCCS	960710	BERT/B/N/J/	4	10.32	Y B	GK GK	ST	960612	RSRZEU
0112	LIMBOG	960703	BLACK/A/S/I	4	10.32	Y B	GK GK	ST	960607	QTTZLJ
0112	LIMCCS	960710	BLACK/A/S/I	4	10.32	Y B	GK GK	ST	960607	QTTZLJ
0112	LIMBOG	960703	BLACKE/M/M/	4	10.32	Y B	GK GK	ST	960619	SSIIPWO
0112	LIMCCS	960710	BLACKE/M/M/	4	10.32	Y B	GK GK	ST	960619	SSIIPWO
0112	LIMBOG	960703	BLARNEY/C/V	4	10.32	Y B	GK GK	ST	960610	QYNYLE
0112	LIMCCS	960710	BLARNEY/C/V	4	10.32	Y B	GK GK	ST	960610	QYNYLE
0112	LIMBOG	960703	BLOCK/W/S/R	4	10.32	Y B	GK GK	ST	960607	QTTMZ
0112	LIMCCS	960710	BLOCK/W/S/R	4	10.32	Y B	GK GK	ST	960607	QTTMZ
0112	LIMBOG	960703	BLOOMING/C/	4	10.32	Y B	GK GK	ST	960610	QZHTID
0112	LIMCCS	960710	BLOOMING/C/	4	10.32	Y B	GK GK	ST	960610	QZHTID
0112	LIMBOG	960703	BOENING/R/R	4	10.32	Y B	GK GK	ST	960612	QJHEOB
0112	LIMCCS	960710	BOENING/R/R	4	10.32	Y B	GK GK	ST	960612	QJHEOB
0112	LIMBOG	960703	BOOKMAKER/C	4	10.32	Y B	GK GK	ST	960619	SSIAYU
0112	LIMCCS	960710	BOOKMAKER/C	4	10.32	Y B	GK GK	ST	960619	SSIAYU
0112	LIMBOG	960703	BORY/C/D/W/	4	10.32	Y B	GK GK	ST	960607	QTJARM
0112	LIMCCS	960710	BORY/C/D/W/	4	10.32	Y B	GK GK	ST	960607	QTJARM
0112	LIMBOG	960703	BORY/R/C/U/	4	10.32	Y B	GK GK	ST	960607	QTJYYI
0112	LIMCCS	960710	BORY/R/C/U/	4	10.32	Y B	GK GK	ST	960607	QTJYYI
0112	LIMBOG	960703	BROWN/C/T/Y	4	10.32	Y B	GK GK	ST	960607	QTIYLN
0112	LIMCCS	960710	BROWN/C/T/Y	4	10.32	Y B	GK GK	ST	960607	QTIYLN
0112	LIMBOG	960703	BROWNE/B/B	4	10.32	Y B	GK GK	ST	960619	SSJZFB
0112	LIMCCS	960710	BROWNE/B/B	4	10.32	Y B	GK GK	ST	960619	SSJZFB
0112	LIMBOG	960703	BRUCE/H/J/K	4	10.32	Y B	GK GK	ST	960612	QJIVNS
0112	LIMCCS	960710	BRUCE/H/J/K	4	10.32	Y B	GK GK	ST	960612	QJIVNS
0112	LIMBOG	960703	BURDISO/J/	4	10.32	Y B	GK GK	ST	960612	QMWGWN
0112	LIMCCS	960710	BURDISO/J/	4	10.32	Y B	GK GK	ST	960612	QMWGWN
0112	LIMBOG	960703	CALLABASA/C	4	10.32	Y B	GK GK	ST	960612	QMYAKV
0112	LIMCCS	960710	CALLABASA/C	4	10.32	Y B	GK GK	ST	960612	QMYAKV
0112	LIMBOG	960703	CANELAS/X/C	4	10.32	Y B	GK GK	ST	960607	QTKPVJ
0112	LIMCCS	960710	CANELAS/X/C	4	10.32	Y B	GK GK	ST	960607	QTKPVJ

0112	LIMBOG	960703	CARNE/S/D/F	4	10.32	Y B	GK GK	ST	960610	QZEPKS
0112	LIMCCS	960710	CARNE/S/D/F	4	10.32	Y B	GK GK	ST	960610	QZEPKS
0112	LIMBOG	960703	CARNEY/C/V/	4	10.32	Y B	GK GK	ST	960610	QZFUND
0112	LIMCCS	960710	CARNEY/C/V/	4	10.32	Y B	GK GK	ST	960610	QZFUND
0112	LIMBOG	960703	CARRASQUILL	4	10.32	Y B	GK GK	ST	960607	QJXPCY
0112	LIMCCS	960710	CARRASQUILL	4	10.32	Y B	GK GK	ST	960607	QJXPCY
0112	LIMBOG	960703	CASEY/R/T/Y	4	10.32	Y B	GK GK	ST	960612	RSQGEI
0112	LIMCCS	960710	CASEY/R/T/Y	4	10.32	Y B	GK GK	ST	960612	RSQGEI
0112	LIMBOG	960703	CASYE/C/V/B	4	10.32	Y B	GK GK	ST	960612	QMV DYV
0112	LIMCCS	960710	CASYE/C/V/B	4	10.32	Y B	GK GK	ST	960612	QMV DYV
0112	LIMBOG	960703	CEBOLLA/S/D	4	10.32	Y B	GK GK	ST	960610	QYNQZX
0112	LIMCCS	960710	CEBOLLA/S/D	4	10.32	Y B	GK GK	ST	960610	QYNQZX
0112	LIMBOG	960703	CHAVEZ/A/W/	4	10.32	Y B	GK GK	ST	960607	QTVWEO
0112	LIMCCS	960710	CHAVEZ/A/W/	4	10.32	Y B	GK GK	ST	960607	QTVWEO
0112	LIMBOG	960703	COREY/S/W/E	4	10.32	Y B	GK GK	ST	960612	QMVILS
0112	LIMCCS	960710	COREY/S/W/E	4	10.32	Y B	GK GK	ST	960612	QMVILS
0112	LIMBOG	960703	CROIX/A/S/D	4	10.32	Y B	GK GK	ST	960607	QTYTTH
0112	LIMCCS	960710	CROIX/A/S/D	4	10.32	Y B	GK GK	ST	960607	QTYTTH
0112	LIMBOG	960703	CRUZ/A/S/D/	4	10.32	Y B	GK GK	ST	960610	QYFVMA
0112	LIMCCS	960710	CRUZ/A/S/D/	4	10.32	Y B	GK GK	ST	960610	QYFVMA
0112	LIMBOG	960703	DAMASCUS/W/	4	10.32	Y B	GK GK	ST	960610	QLCVOE
0112	LIMCCS	960710	DAMASCUS/W/	4	10.32	Y B	GK GK	ST	960610	QLCVOE
0112	LIMBOG	960703	DILLARD/C/C	4	10.32	Y B	GK GK	ST	960610	QYODHF
0112	LIMCCS	960710	DILLARD/C/C	4	10.32	Y B	GK GK	ST	960610	QYODHF
0112	LIMBOG	960703	DORADO/E/W/	4	10.32	Y B	GK GK	ST	960607	QTLXKN
0112	LIMCCS	960710	DORADO/E/W/	4	10.32	Y B	GK GK	ST	960607	QTLXKN
0112	LIMBOG	960703	DREAMS/D/F/	4	10.32	Y B	GK GK	ST	960612	QJIMSG
0112	LIMCCS	960710	DREAMS/D/F/	4	10.32	Y B	GK GK	ST	960612	QJIMSG
0112	LIMBOG	960703	DREDLOCKS/X	4	10.32	Y B	GK GK	ST	960607	QTNDNV
0112	LIMCCS	960710	DREDLOCKS/X	4	10.32	Y B	GK GK	ST	960607	QTNDNV
0112	LIMBOG	960703	ECH/T/Y/U/I	4	10.32	Y B	GK GK	ST	960612	QJHVPK
0112	LIMCCS	960710	ECH/T/Y/U/I	4	10.32	Y B	GK GK	ST	960612	QJHVPK
0112	LIMBOG	960703	EERDMANN/C/	4	10.32	Y B	GK GK	ST	960610	QYPHDJ
0112	LIMCCS	960710	EERDMANN/C/	4	10.32	Y B	GK GK	ST	960610	QYPHDJ
0112	LIMBOG	960703	FERGUSON/C/	4	10.32	Y B	GK GK	ST	960612	RSQP AE
0112	LIMCCS	960710	FERGUSON/C/	4	10.32	Y B	GK GK	ST	960612	RSQP AE
0112	LIMBOG	960703	FISH/C/V/B/	4	10.32	Y B	GK GK	ST	960607	QTXADD
0112	LIMCCS	960710	FISH/C/V/B/	4	10.32	Y B	GK GK	ST	960607	QTXADD
0112	LIMBOG	960703	FORD/A/S/D/	4	10.32	Y B	GK GK	ST	960607	QTM DNU
0112	LIMCCS	960710	FORD/A/S/D/	4	10.32	Y B	GK GK	ST	960607	QTM DNU
0112	LIMBOG	960703	FUERTES/C/F	4	10.32	Y B	GK GK	ST	960607	QTJQAM
0112	LIMCCS	960710	FUERTES/C/F	4	10.32	Y B	GK GK	ST	960607	QTJQAM
0112	LIMBOG	960703	GAITLIN/A/S	4	10.32	Y B	GK GK	ST	960607	QTYCSV
0112	LIMCCS	960710	GAITLIN/A/S	4	10.32	Y B	GK GK	ST	960607	QTYCSV
0112	LIMBOG	960703	GARCIA/D/F/	4	10.32	Y B	GK GK	ST	960607	QTUFVP
0112	LIMCCS	960710	GARCIA/D/F/	4	10.32	Y B	GK GK	ST	960607	QTUFVP
0112	LIMBOG	960703	GOATS/W/E/P	4	10.32	Y B	GK GK	ST	960607	QTI OCP
0112	LIMCCS	960710	GOATS/W/E/P	4	10.32	Y B	GK GK	ST	960607	QTI OCP
0112	LIMBOG	960703	GOLD/S/A/S/	4	10.32	Y B	GK GK	ST	960607	QTMUQQ
0112	LIMCCS	960710	GOLD/S/A/S/	4	10.32	Y B	GK GK	ST	960607	QTMUQQ
0112	LIMBOG	960703	GOLDSTEIN/C	4	10.32	Y B	GK GK	ST	960607	QTMWFX
0112	LIMCCS	960710	GOLDSTEIN/C	4	10.32	Y B	GK GK	ST	960607	QTMWFX
0112	LIMBOG	960703	GOLIATH/D/D	4	10.32	Y B	GK GK	ST	960610	QZIQBG
0112	LIMCCS	960710	GOLIATH/D/D	4	10.32	Y B	GK GK	ST	960610	QZIQBG
0112	LIMBOG	960703	GONZALES/A/	4	10.32	Y B	GK GK	ST	960607	QTKTEX
0112	LIMCCS	960710	GONZALES/A/	4	10.32	Y B	GK GK	ST	960607	QTKTEX
0112	LIMBOG	960703	GONZALEZ/A/	4	10.32	Y B	GK GK	ST	960607	QTVQXJ
0112	LIMCCS	960710	GONZALEZ/A/	4	10.32	Y B	GK GK	ST	960607	QTVQXJ
0112	LIMBOG	960703	GOYA/X/C/V/	4	10.32	Y B	GK GK	ST	960610	QZEELN
0112	LIMCCS	960710	GOYA/X/C/V/	4	10.32	Y B	GK GK	ST	960610	QZEELN
0112	LIMBOG	960703	GRAVES/C/V/	4	10.32	Y B	GK GK	ST	960612	QJKSDP
0112	LIMCCS	960710	GRAVES/C/V/	4	10.32	Y B	GK GK	ST	960612	QJKSDP
0112	LIMBOG	960703	GREAN/C/D/E	4	10.32	Y B	GK GK	ST	960607	QJXC YI
0112	LIMCCS	960710	GREAN/C/D/E	4	10.32	Y B	GK GK	ST	960607	QJXC YI
0112	LIMBOG	960703	GREANE/D/H/	4	10.32	Y B	GK GK	ST	960607	QTTYUM
0112	LIMCCS	960710	GREANE/D/H/	4	10.32	Y B	GK GK	ST	960607	QTTYUM
0112	LIMBOG	960703	GREENE/W/W	4	10.32	Y B	GK GK	ST	960619	SSJWUZ
0112	LIMCCS	960710	GREENE/W/W	4	10.32	Y B	GK GK	ST	960619	SSJWUZ
0112	LIMBOG	960703	GREEN/A/A/A	4	10.32	Y B	GK GK	ST	960621	TQWWSV
0112	LIMCCS	960710	GREEN/A/A/A	4	10.32	Y B	GK GK	ST	960621	TQWWSV
0112	LIMBOG	960703	GREEN/B/B/B	4	10.32	Y B	GK GK	ST	960621	TQWYEP
0112	LIMCCS	960710	GREEN/B/B/B	4	10.32	Y B	GK GK	ST	960621	TQWYEP
0112	LIMBOG	960703	GREEN/C/C/C	4	10.32	Y B	GK GK	ST	960621	TQWALR

0112	LIMCCS	960710	GREEN/C/C/C	4	10.32	Y	B	GK GK	ST	960621	TQWALR
0112	LIMBOG	960703	GREEN/C/W/I	4	10.32	Y	B	GK GK	ST	960607	QTIAUG
0112	LIMCCS	960710	GREEN/C/W/I	4	10.32	Y	B	GK GK	ST	960607	QTIAUG
0112	LIMBOG	960703	GREEN/D/D/D	4	10.32	Y	B	GK GK	ST	960621	TQWDXI
0112	LIMCCS	960710	GREEN/D/D/D	4	10.32	Y	B	GK GK	ST	960621	TQWDXI
0112	LIMBOG	960703	GREEN/E/E/E	4	10.32	Y	B	GK GK	ST	960621	TQWFCG
0112	LIMCCS	960710	GREEN/E/E/E	4	10.32	Y	B	GK GK	ST	960621	TQWFCG
0112	LIMBOG	960703	GREEN/F/F/F	4	10.32	Y	B	GK GK	ST	960621	TQWJUX
0112	LIMCCS	960710	GREEN/F/F/F	4	10.32	Y	B	GK GK	ST	960621	TQWJUX
0112	LIMBOG	960703	GREEN/G/G/G	4	10.32	Y	B	GK GK	ST	960621	TQWLOH
0112	LIMCCS	960710	GREEN/G/G/G	4	10.32	Y	B	GK GK	ST	960621	TQWLOH
0112	LIMBOG	960703	GREEN/H/H/H	4	10.32	Y	B	GK GK	ST	960621	TQWOSP
0112	LIMCCS	960710	GREEN/H/H/H	4	10.32	Y	B	GK GK	ST	960621	TQWOSP
0112	LIMBOG	960703	GREEN/I/I/I	4	10.32	Y	B	GK GK	ST	960621	TQXREV
0112	LIMCCS	960710	GREEN/I/I/I	4	10.32	Y	B	GK GK	ST	960621	TQXREV
0112	LIMBOG	960703	GREEN/J/J/J	4	10.32	Y	B	GK GK	ST	960621	TQXUPC
0112	LIMCCS	960710	GREEN/J/J/J	4	10.32	Y	B	GK GK	ST	960621	TQXUPC
0112	LIMBOG	960703	GREEN/K/K/K	4	10.32	Y	B	GK GK	ST	960621	TQXXOO
0112	LIMCCS	960710	GREEN/K/K/K	4	10.32	Y	B	GK GK	ST	960621	TQXXOO
0112	LIMBOG	960703	GREEN/L/L/L	4	10.32	Y	B	GK GK	ST	960621	TQXALL
0112	LIMCCS	960710	GREEN/L/L/L	4	10.32	Y	B	GK GK	ST	960621	TQXALL
0112	LIMBOG	960703	GREEN/M/M/M	4	10.32	Y	B	GK GK	ST	960621	TQXDKR
0112	LIMCCS	960710	GREEN/M/M/M	4	10.32	Y	B	GK GK	ST	960621	TQXDKR
0112	LIMBOG	960703	GREEN/N/N/N	4	10.32	Y	B	GK GK	ST	960621	TQXGIU
0112	LIMCCS	960710	GREEN/N/N/N	4	10.32	Y	B	GK GK	ST	960621	TQXGIU
0112	LIMBOG	960703	GREEN/O/O/O	4	10.32	Y	B	GK GK	ST	960621	TQXKVN
0112	LIMCCS	960710	GREEN/O/O/O	4	10.32	Y	B	GK GK	ST	960621	TQXKVN
0112	LIMBOG	960703	GREEN/P/P/P	4	10.32	Y	B	GK GK	ST	960621	TQXMJB
0112	LIMCCS	960710	GREEN/P/P/P	4	10.32	Y	B	GK GK	ST	960621	TQXMJB
0112	LIMBOG	960703	GREEN/Q/Q/Q	4	10.32	Y	B	GK GK	ST	960621	TQXPVA
0112	LIMCCS	960710	GREEN/Q/Q/Q	4	10.32	Y	B	GK GK	ST	960621	TQXPVA
0112	LIMBOG	960703	GREEN/R/R/R	4	10.32	Y	B	GK GK	ST	960621	TQYSSP
0112	LIMCCS	960710	GREEN/R/R/R	4	10.32	Y	B	GK GK	ST	960621	TQYSSP
0112	LIMBOG	960703	GREEN/S/S/S	4	10.32	Y	B	GK GK	ST	960621	TQYUJX
0112	LIMCCS	960710	GREEN/S/S/S	4	10.32	Y	B	GK GK	ST	960621	TQYUJX
0112	LIMBOG	960703	GREEN/T/T/T	4	10.32	Y	B	GK GK	ST	960621	TQYXBB
0112	LIMCCS	960710	GREEN/T/T/T	4	10.32	Y	B	GK GK	ST	960621	TQYXBB
0112	LIMBOG	960703	GREEN/U/U/U	4	10.32	Y	B	GK GK	ST	960621	TQYBET
0112	LIMCCS	960710	GREEN/U/U/U	4	10.32	Y	B	GK GK	ST	960621	TQYBET
0112	LIMBOG	960703	GREEN/V/V/V	4	10.32	Y	B	GK GK	ST	960621	TQYIDA
0112	LIMCCS	960710	GREEN/V/V/V	4	10.32	Y	B	GK GK	ST	960621	TQYIDA
0112	LIMBOG	960703	GREEN/W/W/W	4	10.32	Y	B	GK GK	ST	960621	TQYLUB
0112	LIMCCS	960710	GREEN/W/W/W	4	10.32	Y	B	GK GK	ST	960621	TQYLUB
0112	LIMBOG	960703	GREEN/X/X/X	4	10.32	Y	B	GK GK	ST	960621	TQYNIR
0112	LIMCCS	960710	GREEN/X/X/X	4	10.32	Y	B	GK GK	ST	960621	TQYNIR
0112	LIMBOG	960703	GREEN/Y/Y/Y	4	10.32	Y	B	GK GK	ST	960621	TQZQVI
0112	LIMCCS	960710	GREEN/Y/Y/Y	4	10.32	Y	B	GK GK	ST	960621	TQZQVI
0112	LIMBOG	960703	GREEN/Z/Z/Z	4	10.32	Y	B	GK GK	ST	960621	TQZSCG
0112	LIMCCS	960710	GREEN/Z/Z/Z	4	10.32	Y	B	GK GK	ST	960621	TQZSCG
0112	LIMBOG	960703	GREENE/C/D/	4	10.32	Y	B	GK GK	ST	960607	QTTVOE
0112	LIMCCS	960710	GREENE/C/D/	4	10.32	Y	B	GK GK	ST	960607	QTTVOE
0112	LIMBOG	960703	GREENLEY/C/	4	10.32	Y	B	GK GK	ST	960610	QLBKYS
0112	LIMCCS	960710	GREENLEY/C/	4	10.32	Y	B	GK GK	ST	960610	QLBKYS
0112	LIMBOG	960703	HAYDDEN/H/H	4	10.32	Y	B	GK GK	ST	960619	SSKQUA
0112	LIMCCS	960710	HAYDDEN/H/H	4	10.32	Y	B	GK GK	ST	960619	SSKQUA
0112	LIMBOG	960703	HAYDEN/M/D/	4	10.32	Y	B	GK GK	ST	960607	QSNNGI
0112	LIMCCS	960710	HAYDEN/M/D/	4	10.32	Y	B	GK GK	ST	960607	QSNNGI
0112	LIMBOG	960703	HAYDENN/S/S	4	10.32	Y	B	GK GK	ST	960619	SSKSIJ
0112	LIMCCS	960710	HAYDENN/S/S	4	10.32	Y	B	GK GK	ST	960619	SSKSIJ
0112	LIMBOG	960703	HAYYDDENN/D	4	10.32	Y	B	GK GK	ST	960619	SSJJYN
0112	LIMCCS	960710	HAYYDDENN/D	4	10.32	Y	B	GK GK	ST	960619	SSJJYN
0112	LIMBOG	960703	HAYYDEN/M/M	4	10.32	Y	B	GK GK	ST	960619	SSJMEI
0112	LIMCCS	960710	HAYYDEN/M/M	4	10.32	Y	B	GK GK	ST	960619	SSJMEI
0112	LIMBOG	960703	HERCULES/C/	4	10.32	Y	B	GK GK	ST	960610	QLCKVU
0112	LIMCCS	960710	HERCULES/C/	4	10.32	Y	B	GK GK	ST	960610	QLCKVU
0112	LIMBOG	960703	HERNANDEZ/A	4	10.32	Y	B	GK GK	ST	960607	QTKDXX
0112	LIMCCS	960710	HERNANDEZ/A	4	10.32	Y	B	GK GK	ST	960607	QTKDXX
0112	LIMBOG	960703	HILERA/H/J/	4	10.32	Y	B	GK GK	ST	960607	QTVZQT
0112	LIMCCS	960710	HILERA/H/J/	4	10.32	Y	B	GK GK	ST	960607	QTVZQT
0112	LIMBOG	960703	HORSES/C/V/	4	10.32	Y	B	GK GK	ST	960607	QTISQP
0112	LIMCCS	960710	HORSES/C/V/	4	10.32	Y	B	GK GK	ST	960607	QTISQP
0112	LIMBOG	960703	ICK/Y/U/I/O	4	10.32	Y	B	GK GK	ST	960612	QMVOAA
0112	LIMCCS	960710	ICK/Y/U/I/O	4	10.32	Y	B	GK GK	ST	960612	QMVOAA

0112	LIMBOG	960703	JIMENEZ/A/E	4	10.32	Y	B	GK GK	ST	960607	QTTMUR
0112	LIMCCS	960710	JIMENEZ/A/E	4	10.32	Y	B	GK GK	ST	960607	QTTMUR
0112	LIMBOG	960703	JONES/A/Q/A	4	10.32	Y	B	GK GK	ST	960619	SSILBV
0112	LIMCCS	960710	JONES/A/Q/A	4	10.32	Y	B	GK GK	ST	960619	SSILBV
0112	LIMBOG	960703	JOONES/C/V/	4	10.32	Y	B	GK GK	ST	960619	SSINTH
0112	LIMCCS	960710	JOONES/C/V/	4	10.32	Y	B	GK GK	ST	960619	SSINTH
0112	LIMBOG	960703	KUSHNNER/V/	4	10.32	Y	B	GK GK	ST	960619	SSKBBL
0112	LIMCCS	960710	KUSHNNER/V/	4	10.32	Y	B	GK GK	ST	960619	SSKBBL
0112	LIMBOG	960703	KUUSHNER/C/	4	10.32	Y	B	GK GK	ST	960619	SSKGDN
0112	LIMCCS	960710	KUUSHNER/C/	4	10.32	Y	B	GK GK	ST	960619	SSKGDN
0112	LIMBOG	960703	LAMBERSON/C	4	10.32	Y	B	GK GK	ST	960610	QYNLJT
0112	LIMCCS	960710	LAMBERSON/C	4	10.32	Y	B	GK GK	ST	960610	QYNLJT
0112	LIMBOG	960703	LAMPBERT/Q/	4	10.32	Y	B	GK GK	ST	960610	QLBPLA
0112	LIMCCS	960710	LAMPBERT/Q/	4	10.32	Y	B	GK GK	ST	960610	QLBPLA
0112	LIMBOG	960703	LEE/A/A/A/A	4	10.32	Y	B	GK GK	ST	960621	TQZXPB
0112	LIMCCS	960710	LEE/A/A/A/A	4	10.32	Y	B	GK GK	ST	960621	TQZXPB
0112	LIMBOG	960703	LEE/B/B/B/B	4	10.32	Y	B	GK GK	ST	960621	TQZAGF
0112	LIMCCS	960710	LEE/B/B/B/B	4	10.32	Y	B	GK GK	ST	960621	TQZAGF
0112	LIMBOG	960703	LEE/C/C/C/C	4	10.32	Y	B	GK GK	ST	960621	TQZCNK
0112	LIMCCS	960710	LEE/C/C/C/C	4	10.32	Y	B	GK GK	ST	960621	TQZCNK
0112	LIMBOG	960703	LEE/C/V/B/N	4	10.32	Y	B	GK GK	ST	960607	QTCMRL
0112	LIMCCS	960710	LEE/C/V/B/N	4	10.32	Y	B	GK GK	ST	960607	QTCMRL
0112	LIMBOG	960703	LEE/D/D/D/D	4	10.32	Y	B	GK GK	ST	960621	TQZFVS
0112	LIMCCS	960710	LEE/D/D/D/D	4	10.32	Y	B	GK GK	ST	960621	TQZFVS
0112	LIMBOG	960703	LEE/E/E/E/E	4	10.32	Y	B	GK GK	ST	960621	TQZHJE
0112	LIMCCS	960710	LEE/E/E/E/E	4	10.32	Y	B	GK GK	ST	960621	TQZHJE
0112	LIMBOG	960703	LEE/F/F/F/F	4	10.32	Y	B	GK GK	ST	960621	TQZKVV
0112	LIMCCS	960710	LEE/F/F/F/F	4	10.32	Y	B	GK GK	ST	960621	TQZKVV
0112	LIMBOG	960703	LEE/G/G/G/G	4	10.32	Y	B	GK GK	ST	960621	TQZNRK
0112	LIMCCS	960710	LEE/G/G/G/G	4	10.32	Y	B	GK GK	ST	960621	TQZNRK
0112	LIMBOG	960703	LEE/H/H/H/H	4	10.32	Y	B	GK GK	ST	960621	TQAEQF
0112	LIMCCS	960710	LEE/H/H/H/H	4	10.32	Y	B	GK GK	ST	960621	TQAEQF
0112	LIMBOG	960703	LEE/I/I/I/I	4	10.32	Y	B	GK GK	ST	960621	TQASPU
0112	LIMCCS	960710	LEE/I/I/I/I	4	10.32	Y	B	GK GK	ST	960621	TQASPU
0112	LIMBOG	960703	LEE/J/J/J/J	4	10.32	Y	B	GK GK	ST	960621	TQAVHE
0112	LIMCCS	960710	LEE/J/J/J/J	4	10.32	Y	B	GK GK	ST	960621	TQAVHE
0112	LIMBOG	960703	LEE/K/K/K/K	4	10.32	Y	B	GK GK	ST	960621	TQABIW
0112	LIMCCS	960710	LEE/K/K/K/K	4	10.32	Y	B	GK GK	ST	960621	TQABIW
0112	LIMBOG	960703	LEE/L/L/L/L	4	10.32	Y	B	GK GK	ST	960621	TQAESZ
0112	LIMCCS	960710	LEE/L/L/L/L	4	10.32	Y	B	GK GK	ST	960621	TQAESZ
0112	LIMBOG	960703	LEE/M/M/M/M	4	10.32	Y	B	GK GK	ST	960621	TQAKZF
0112	LIMCCS	960710	LEE/M/M/M/M	4	10.32	Y	B	GK GK	ST	960621	TQAKZF
0112	LIMBOG	960703	LEE/N/N/N/N	4	10.32	Y	B	GK GK	ST	960621	TQAMFZ
0112	LIMCCS	960710	LEE/N/N/N/N	4	10.32	Y	B	GK GK	ST	960621	TQAMFZ
0112	LIMBOG	960703	LEE/O/O/O/O	4	10.32	Y	B	GK GK	ST	960621	TQAPFN
0112	LIMCCS	960710	LEE/O/O/O/O	4	10.32	Y	B	GK GK	ST	960621	TQAPFN
0112	LIMBOG	960703	LEE/P/P/P/P	4	10.32	Y	B	GK GK	ST	960621	TQBSXC
0112	LIMCCS	960710	LEE/P/P/P/P	4	10.32	Y	B	GK GK	ST	960621	TQBSXC
0112	LIMBOG	960703	LEE/Q/Q/Q/Q	4	10.32	Y	B	GK GK	ST	960621	TQBWSX
0112	LIMCCS	960710	LEE/Q/Q/Q/Q	4	10.32	Y	B	GK GK	ST	960621	TQBWSX
0112	LIMBOG	960703	LEE/R/R/R/R	4	10.32	Y	B	GK GK	ST	960621	TQBYJQ
0112	LIMCCS	960710	LEE/R/R/R/R	4	10.32	Y	B	GK GK	ST	960621	TQBYJQ
0112	LIMBOG	960703	LEE/S/S/S/S	4	10.32	Y	B	GK GK	ST	960621	TQJGRK
0112	LIMCCS	960710	LEE/S/S/S/S	4	10.32	Y	B	GK GK	ST	960621	TQJGRK
0112	LIMBOG	960703	LEE/T/T/T/T	4	10.32	Y	B	GK GK	ST	960621	TQKGYQ
0112	LIMCCS	960710	LEE/T/T/T/T	4	10.32	Y	B	GK GK	ST	960621	TQKGYQ
0112	LIMBOG	960703	LENTZ/A/W/E	4	10.32	Y	B	GK GK	ST	960612	QMWNVQ
0112	LIMCCS	960710	LENTZ/A/W/E	4	10.32	Y	B	GK GK	ST	960612	QMWNVQ
0112	LIMBOG	960703	LEVINE/A/S/	4	10.32	Y	B	GK GK	ST	960607	QTMVLO
0112	LIMCCS	960710	LEVINE/A/S/	4	10.32	Y	B	GK GK	ST	960607	QTMVLO
0112	LIMBOG	960703	LOCH/T/Y/U/	4	10.32	Y	B	GK GK	ST	960612	QMWVCA
0112	LIMCCS	960710	LOCH/T/Y/U/	4	10.32	Y	B	GK GK	ST	960612	QMWVCA
0112	LIMBOG	960703	LOMBA/Z/X/C	4	10.32	Y	B	GK GK	ST	960607	QTKLPN
0112	LIMCCS	960710	LOMBA/Z/X/C	4	10.32	Y	B	GK GK	ST	960607	QTKLPN
0112	LIMBOG	960703	LOMLINSON/C	4	10.32	Y	B	GK GK	ST	960610	QZGUIG
0112	LIMCCS	960710	LOMLINSON/C	4	10.32	Y	B	GK GK	ST	960610	QZGUIG
0112	LIMBOG	960703	LONG/S/S/S/	4	10.32	Y	B	GK GK	ST	960619	SSKIYL
0112	LIMCCS	960710	LONG/S/S/S/	4	10.32	Y	B	GK GK	ST	960619	SSKIYL
0112	LIMBOG	960703	MAGOO/P/P/P	4	10.32	Y	B	GK GK	ST	960610	QYPBBW
0112	LIMCCS	960710	MAGOO/P/P/P	4	10.32	Y	B	GK GK	ST	960610	QYPBBW
0112	LIMBOG	960703	MALHUMORS/C	4	10.32	Y	B	GK GK	ST	960612	QJIPQY
0112	LIMCCS	960710	MALHUMORS/C	4	10.32	Y	B	GK GK	ST	960612	QJIPQY
0112	LIMBOG	960703	MANERA/V/B/	4	10.32	Y	B	GK GK	ST	960612	QJJPCU

0112	LIMCCS	960710	MANERA/V/B/	4	10.32	Y	B	GK GK	ST	960612	QJJP CU
0112	LIMBOG	960703	MAPLE/S/W/E	4	10.32	Y	B	GK GK	ST	960607	QTUAAU
0112	LIMCCS	960710	MAPLE/S/W/E	4	10.32	Y	B	GK GK	ST	960607	QTUAAU
0112	LIMBOG	960703	MARCUS/C/V/	4	10.32	Y	B	GK GK	ST	960607	QTNHYD
0112	LIMCCS	960710	MARCUS/C/V/	4	10.32	Y	B	GK GK	ST	960607	QTNHYD
0112	LIMBOG	960703	MARIE/C/V/F	4	10.32	Y	B	GK GK	ST	960619	SSJTEZ
0112	LIMCCS	960710	MARIE/C/V/F	4	10.32	Y	B	GK GK	ST	960619	SSJTEZ
0112	LIMBOG	960703	MARTINEZ/A/	4	10.32	Y	B	GK GK	ST	960607	QTKAUS
0112	LIMCCS	960710	MARTINEZ/A/	4	10.32	Y	B	GK GK	ST	960607	QTKAUS
0112	LIMBOG	960703	MARULLO/A/W	4	10.32	Y	B	GK GK	ST	960610	QYPCDC
0112	LIMCCS	960710	MARULLO/A/W	4	10.32	Y	B	GK GK	ST	960610	QYPCDC
0112	LIMBOG	960703	MAXIM/X/S/E	4	10.32	Y	B	GK GK	ST	960607	QTYASN
0112	LIMCCS	960710	MAXIM/X/S/E	4	10.32	Y	B	GK GK	ST	960607	QTYASN
0112	LIMBOG	960703	MAYAGUEZ/C/	4	10.32	Y	B	GK GK	ST	960612	QJJAKK
0112	LIMCCS	960710	MAYAGUEZ/C/	4	10.32	Y	B	GK GK	ST	960612	QJJAKK
0112	LIMBOG	960703	MCCONNELL/C	4	10.32	Y	B	GK GK	ST	960607	QTWUHO
0112	LIMCCS	960710	MCCONNELL/C	4	10.32	Y	B	GK GK	ST	960607	QTWUHO
0112	LIMBOG	960703	MEDICOS/A/W	4	10.32	Y	B	GK GK	ST	960607	QTWFLN
0112	LIMCCS	960710	MEDICOS/A/W	4	10.32	Y	B	GK GK	ST	960607	QTWFLN
0112	LIMBOG	960703	MELOCOTON/S	4	10.32	Y	B	GK GK	ST	960610	QZENFJ
0112	LIMCCS	960710	MELOCOTON/S	4	10.32	Y	B	GK GK	ST	960610	QZENFJ
0112	LIMBOG	960703	MILLER/S/S/	4	10.32	Y	B	GK GK	ST	960610	QLCAEE
0112	LIMCCS	960710	MILLER/S/S/	4	10.32	Y	B	GK GK	ST	960610	QLCAEE
0112	LIMBOG	960703	MITCHELL/S/	4	10.32	Y	B	GK GK	ST	960607	QTUJTY
0112	LIMCCS	960710	MITCHELL/S/	4	10.32	Y	B	GK GK	ST	960607	QTUJTY
0112	LIMBOG	960703	MOHAMMED/C/	4	10.32	Y	B	GK GK	ST	960610	QZGBFT
0112	LIMCCS	960710	MOHAMMED/C/	4	10.32	Y	B	GK GK	ST	960610	QZGBFT
0112	LIMBOG	960703	MOOREE/S/S/	4	10.32	Y	B	GK GK	ST	960619	SSKWHV
0112	LIMCCS	960710	MOOREE/S/S/	4	10.32	Y	B	GK GK	ST	960619	SSKWHV
0112	LIMBOG	960703	MOORES/C/V/	4	10.32	Y	B	GK GK	ST	960607	QJYPVK
0112	LIMCCS	960710	MOORES/C/V/	4	10.32	Y	B	GK GK	ST	960607	QJYPVK
0112	LIMBOG	960703	MORRE/C/C/C	4	10.32	Y	B	GK GK	ST	960619	SSKYHD
0112	LIMCCS	960710	MORRE/C/C/C	4	10.32	Y	B	GK GK	ST	960619	SSKYHD
0112	LIMBOG	960703	MOSHIER/C/C	4	10.32	Y	B	GK GK	ST	960610	QZILEP
0112	LIMCCS	960710	MOSHIER/C/C	4	10.32	Y	B	GK GK	ST	960610	QZILEP
0112	LIMBOG	960703	NAIM/C/V/F/	4	10.32	Y	B	GK GK	ST	960612	QJJKEJ
0112	LIMCCS	960710	NAIM/C/V/F/	4	10.32	Y	B	GK GK	ST	960612	QJJKEJ
0112	LIMBOG	960703	NAVAS/C/V/B	4	10.32	Y	B	GK GK	ST	960612	QMYVLS
0112	LIMCCS	960710	NAVAS/C/V/B	4	10.32	Y	B	GK GK	ST	960612	QMYVLS
0112	LIMBOG	960703	NEWES/X/C/V	4	10.32	Y	B	GK GK	ST	960612	QMXEXX
0112	LIMCCS	960710	NEWES/X/C/V	4	10.32	Y	B	GK GK	ST	960612	QMXEXX
0112	LIMBOG	960703	OAK/S/W/Q/R	4	10.32	Y	B	GK GK	ST	960607	QTJHSX
0112	LIMCCS	960710	OAK/S/W/Q/R	4	10.32	Y	B	GK GK	ST	960607	QTJHSX
0112	LIMBOG	960703	OCH/M/K/L/P	4	10.32	Y	B	GK GK	ST	960612	QJHXHN
0112	LIMCCS	960710	OCH/M/K/L/P	4	10.32	Y	B	GK GK	ST	960612	QJHXHN
0112	LIMBOG	960703	PALM/V/B/N/	4	10.32	Y	B	GK GK	ST	960607	QTNAIN
0112	LIMCCS	960710	PALM/V/B/N/	4	10.32	Y	B	GK GK	ST	960607	QTNAIN
0112	LIMBOG	960703	PALMER/V/B/	4	10.32	Y	B	GK GK	ST	960612	RSRVPK
0112	LIMCCS	960710	PALMER/V/B/	4	10.32	Y	B	GK GK	ST	960612	RSRVPK
0112	LIMBOG	960703	PARKS/C/V/B	4	10.32	Y	B	GK GK	ST	960612	QJHILW
0112	LIMCCS	960710	PARKS/C/V/B	4	10.32	Y	B	GK GK	ST	960612	QJHILW
0112	LIMBOG	960703	PENA/Q/W/O/	4	10.32	Y	B	GK GK	ST	960612	QMZTWI
0112	LIMCCS	960710	PENA/Q/W/O/	4	10.32	Y	B	GK GK	ST	960612	QMZTWI
0112	LIMBOG	960703	PENNER/A/S/	4	10.32	Y	B	GK GK	ST	960607	QTMWGB
0112	LIMCCS	960710	PENNER/A/S/	4	10.32	Y	B	GK GK	ST	960607	QTMWGB
0112	LIMBOG	960703	PEPO/S/D/F/	4	10.32	Y	B	GK GK	ST	960607	QTLPEM
0112	LIMCCS	960710	PEPO/S/D/F/	4	10.32	Y	B	GK GK	ST	960607	QTLPEM
0112	LIMBOG	960703	PEREZ/A/W/E	4	10.32	Y	B	GK GK	ST	960607	QTUMUP
0112	LIMCCS	960710	PEREZ/A/W/E	4	10.32	Y	B	GK GK	ST	960607	QTUMUP
0112	LIMBOG	960703	PINNES/C/V/	4	10.32	Y	B	GK GK	ST	960607	QTLGUT
0112	LIMCCS	960710	PINNES/C/V/	4	10.32	Y	B	GK GK	ST	960607	QTLGUT
0112	LIMBOG	960703	PINO/R/T/Y/	4	10.32	Y	B	GK GK	ST	960610	QYNCPI
0112	LIMCCS	960710	PINO/R/T/Y/	4	10.32	Y	B	GK GK	ST	960610	QYNCPI
0112	LIMBOG	960703	PIPERS/C/V/	4	10.32	Y	B	GK GK	ST	960607	QTXKAX
0112	LIMCCS	960710	PIPERS/C/V/	4	10.32	Y	B	GK GK	ST	960607	QTXKAX
0112	LIMBOG	960703	PLAYERO/C/V	4	10.32	Y	B	GK GK	ST	960607	QTXGAN
0112	LIMCCS	960710	PLAYERO/C/V	4	10.32	Y	B	GK GK	ST	960607	QTXGAN
0112	LIMBOG	960703	PONCE/S/D/F	4	10.32	Y	B	GK GK	ST	960607	QTVNPU
0112	LIMCCS	960710	PONCE/S/D/F	4	10.32	Y	B	GK GK	ST	960607	QTVNPU
0112	LIMBOG	960703	PONIES/C/V/	4	10.32	Y	B	GK GK	ST	960607	QTSNZU
0112	LIMCCS	960710	PONIES/C/V/	4	10.32	Y	B	GK GK	ST	960607	QTSNZU
0112	LIMBOG	960703	RADCLIFF/S/	4	10.32	Y	B	GK GK	ST	960607	QTUYZH
0112	LIMCCS	960710	RADCLIFF/S/	4	10.32	Y	B	GK GK	ST	960607	QTUYZH

0112	LIMCCS	960710	SHEPARD/C/C	4	10.32	Y	B	GK GK	ST	960610	QZGKBO
0112	LIMBOG	960703	SHORT/S/S/S	4	10.32	Y	B	GK GK	ST	960619	SSKKOH
0112	LIMCCS	960710	SHORT/S/S/S	4	10.32	Y	B	GK GK	ST	960619	SSKKOH
0112	LIMBOG	960703	SHUSTER/X/C	4	10.32	Y	B	GK GK	ST	960610	QZHDGJ
0112	LIMCCS	960710	SHUSTER/X/C	4	10.32	Y	B	GK GK	ST	960610	QZHDGJ
0112	LIMBOG	960703	SHWEKI/A/A/	4	10.32	Y	B	GK GK	ST	960610	QLCTPX
0112	LIMCCS	960710	SHWEKI/A/A/	4	10.32	Y	B	GK GK	ST	960610	QLCTPX
0112	LIMBOG	960703	SILVER/S/D/	4	10.32	Y	B	GK GK	ST	960607	QTWJLC
0112	LIMCCS	960710	SILVER/S/D/	4	10.32	Y	B	GK GK	ST	960607	QTWJLC
0112	LIMBOG	960703	SMITH/I/O/P	4	10.32	Y	B	GK GK	ST	960619	SSIISZ
0112	LIMCCS	960710	SMITH/I/O/P	4	10.32	Y	B	GK GK	ST	960619	SSIISZ
0112	LIMBOG	960703	SMITH/Q/W/E	4	10.32	Y	B	GK GK	ST	960607	QTTQNZ
0112	LIMCCS	960710	SMITH/Q/W/E	4	10.32	Y	B	GK GK	ST	960607	QTTQNZ
0112	LIMBOG	960703	SMITHE/A/S/	4	10.32	Y	B	GK GK	ST	960610	QYOHXX
0112	LIMCCS	960710	SMITHE/A/S/	4	10.32	Y	B	GK GK	ST	960610	QYOHXX
0112	LIMBOG	960703	SMITHE/N/M/	4	10.32	Y	B	GK GK	ST	960612	QJKZYH
0112	LIMCCS	960710	SMITHE/N/M/	4	10.32	Y	B	GK GK	ST	960612	QJKZYH
0112	LIMBOG	960703	SOTO/C/D/E/	4	10.32	Y	B	GK GK	ST	960607	QTVSQD
0112	LIMCCS	960710	SOTO/C/D/E/	4	10.32	Y	B	GK GK	ST	960607	QTVSQD
0112	LIMBOG	960703	SPROLL/W/W/	4	10.32	Y	B	GK GK	ST	960612	QMWCKG
0112	LIMCCS	960710	SPROLL/W/W/	4	10.32	Y	B	GK GK	ST	960612	QMWCKG
0112	LIMBOG	960703	SUENOS/C/V/	4	10.32	Y	B	GK GK	ST	960612	QJINEP
0112	LIMCCS	960710	SUENOS/C/V/	4	10.32	Y	B	GK GK	ST	960612	QJINEP
0112	LIMBOG	960703	SURFERS/X/C	4	10.32	Y	B	GK GK	ST	960607	QTXEIM
0112	LIMCCS	960710	SURFERS/X/C	4	10.32	Y	B	GK GK	ST	960607	QTXEIM
0112	LIMBOG	960703	SYRIA/C/V/F	4	10.32	Y	B	GK GK	ST	960610	QYOVEF
0112	LIMCCS	960710	SYRIA/C/V/F	4	10.32	Y	B	GK GK	ST	960610	QYOVEF
0112	LIMBOG	960703	TAILOR/C/V/	4	10.32	Y	B	GK GK	ST	960619	SSIWSY
0112	LIMCCS	960710	TAILOR/C/V/	4	10.32	Y	B	GK GK	ST	960619	SSIWSY
0112	LIMBOG	960703	THOMAS/C/V/	4	10.32	Y	B	GK GK	ST	960607	QTYRHW
0112	LIMCCS	960710	THOMAS/C/V/	4	10.32	Y	B	GK GK	ST	960607	QTYRHW
0112	LIMBOG	960703	TIP/W/E/R/T	4	10.32	Y	B	GK GK	ST	960612	QMWXNQ
0112	LIMCCS	960710	TIP/W/E/R/T	4	10.32	Y	B	GK GK	ST	960612	QMWXNQ
0112	LIMBOG	960703	TITANS/C/V/	4	10.32	Y	B	GK GK	ST	960610	QZHIPP
0112	LIMCCS	960710	TITANS/C/V/	4	10.32	Y	B	GK GK	ST	960610	QZHIPP
0112	LIMBOG	960703	TOPPS/C/V/T	4	10.32	Y	B	GK GK	ST	960612	QMVKGZ
0112	LIMCCS	960710	TOPPS/C/V/T	4	10.32	Y	B	GK GK	ST	960612	QMVKGZ
0112	LIMBOG	960703	TORO/C/V/B/	4	10.32	Y	B	GK GK	ST	960607	QTKGMJ
0112	LIMCCS	960710	TORO/C/V/B/	4	10.32	Y	B	GK GK	ST	960607	QTKGMJ
0112	LIMBOG	960703	TORRES/L/L/	4	10.32	Y	B	GK GK	ST	960612	QMYKEN
0112	LIMCCS	960710	TORRES/L/L/	4	10.32	Y	B	GK GK	ST	960612	QMYKEN
0112	LIMBOG	960703	TREBOL/A/S/	4	10.32	Y	B	GK GK	ST	960607	QTVMYI
0112	LIMCCS	960710	TREBOL/A/S/	4	10.32	Y	B	GK GK	ST	960607	QTVMYI
0112	LIMBOG	960703	TREES/A/S/D	4	10.32	Y	B	GK GK	ST	960607	QTSJVH
0112	LIMCCS	960710	TREES/A/S/D	4	10.32	Y	B	GK GK	ST	960607	QTSJVH
0112	LIMBOG	960703	TRISTE/D/D/	4	10.32	Y	B	GK GK	ST	960612	QJKRER
0112	LIMCCS	960710	TRISTE/D/D/	4	10.32	Y	B	GK GK	ST	960612	QJKRER
0112	LIMBOG	960703	TRUJILLO/V/	4	10.32	Y	B	GK GK	ST	960612	QMYESF
0112	LIMCCS	960710	TRUJILLO/V/	4	10.32	Y	B	GK GK	ST	960612	QMYESF
0112	LIMBOG	960703	VALLECILLO/	4	10.32	Y	B	GK GK	ST	960607	QTUQNW
0112	LIMCCS	960710	VALLECILLO/	4	10.32	Y	B	GK GK	ST	960607	QTUQNW
0112	LIMBOG	960703	VDEW/A/S/D/	4	10.32	Y	B	GK GK	ST	960612	QJHSEX
0112	LIMCCS	960710	VDEW/A/S/D/	4	10.32	Y	B	GK GK	ST	960612	QJHSEX
0112	LIMBOG	960703	VINOS/A/S/W	4	10.32	Y	B	GK GK	ST	960607	QTNSPQ
0112	LIMCCS	960710	VINOS/A/S/W	4	10.32	Y	B	GK GK	ST	960607	QTNSPQ
0112	LIMBOG	960703	VITTO/S/D/F	4	10.32	Y	B	GK GK	ST	960607	QTNUIU
0112	LIMCCS	960710	VITTO/S/D/F	4	10.32	Y	B	GK GK	ST	960607	QTNUIU
0112	LIMBOG	960703	WERT/V/B/N/	4	10.32	Y	B	GK GK	ST	960612	QMWOKR
0112	LIMCCS	960710	WERT/V/B/N/	4	10.32	Y	B	GK GK	ST	960612	QMWOKR
0112	LIMBOG	960703	WHITE/S/D/G	4	10.32	Y	B	GK GK	ST	960607	QTIIBJ
0112	LIMCCS	960710	WHITE/S/D/G	4	10.32	Y	B	GK GK	ST	960607	QTIIBJ
0112	LIMBOG	960703	WHITING/F/G	4	10.32	Y	B	GK GK	ST	960610	QZFIBH
0112	LIMCCS	960710	WHITING/F/G	4	10.32	Y	B	GK GK	ST	960610	QZFIBH
0112	LIMBOG	960703	YUKON/D/F/G	4	10.32	Y	B	GK GK	ST	960612	QJIZZX
0112	LIMCCS	960710	YUKON/D/F/G	4	10.32	Y	B	GK GK	ST	960612	QJIZZX

TOTALS:

1960 5056.80

Sound Technologies Inc. CRSAUDIT Version 4.2 - Tue Sep 24 13:34:22 1996

SAETA AIRLINES

Sabre - Agency Summary Report

JULY 1996

US 4550188 Q4B2 DEBONIAR TRAVEL INC. @ HOUSTON				TX
ST Y B	124	319.92		
ST Y C	4	-9.84		
Totals:	128	310.08		
Agency Totals:	128	310.08		

Agency Status Distribution

US 4550188 Q4B2 DEBONIAR TRAVEL INC. @ HOUSTON				TX
GK B	124	319.92		
GK C	4	-9.84		
Totals:	128	310.08		
Agency Totals:	128	310.08		

Sound Technologies Inc. CRSAUDIT Version 4.2 - Tue Sep 24 13:34:24 1996

SAETA AIRLINES

Sabre Detail for Pseudo City Code Q4B2

JULY 1996

(US - DEBONIAR TRAVEL INC.)

Flt	CityPr	SgDate	Passenger Name	Segs	Cost	Cl	Stat	Acc	TrDate	Locatr
0112	LIMBOG	960806	HAYDEN/M/D/	4	10.32	Y B	GK GK	ST	960719	SHKUGR
0112	LIMBOG	960806	LEE/B/D/L/S	4	10.32	Y B	GK GK	ST	960719	SHKXFM
0112	LIMBOG	960806	SMITH/A/A/A	4	10.32	Y B	GK GK	ST	960719	SHBMKP
0112	LIMBOG	960806	SMITH/A/B/C	4	10.32	Y B	GK GK	ST	960719	SHJOHT
0112	LIMBOG	960806	SMITH/B/B/B	4	10.32	Y B	GK GK	ST	960719	SHCXRS
0112	LIMBOG	960806	SMITH/C/C/C	4	10.32	Y B	GK GK	ST	960719	SHFGIB
0112	LIMBOG	960806	SMITH/D/D/D	4	10.32	Y B	GK GK	ST	960719	SHFJKV
0112	LIMBOG	960806	SMITH/E/E/E	4	10.32	Y B	GK GK	ST	960719	SHFMPZ
0112	LIMBOG	960806	SMITH/F/F/F	4	10.32	Y B	GK GK	ST	960719	SHGQPM
0112	LIMBOG	960806	SMITH/G/G/G	4	10.32	Y B	GK GK	ST	960719	SHGTTT
0112	LIMBOG	960806	SMITH/H/H/H	4	10.32	Y B	GK GK	ST	960719	SHGVJK
0112	LIMBOG	960806	SMITH/I/I/I	4	10.32	Y B	GK GK	ST	960719	SHGZYI
0112	LIMBOG	960806	SMITH/J/J/J	4	10.32	Y B	GK GK	ST	960719	SHGCBW
0112	LIMBOG	960806	SMITH/K/K/K	4	10.32	Y B	GK GK	ST	960719	SHGFYU
0112	LIMBOG	960806	SMITH/L/L/L	4	10.32	Y B	GK GK	ST	960719	SHGHEY
0112	LIMBOG	960806	SMITH/M/M/M	4	10.32	Y B	GK GK	ST	960719	SHGKEA
0112	LIMBOG	960806	SMITH/N/N/N	4	10.32	Y B	GK GK	ST	960719	SHGNVD
0112	LIMBOG	960806	SMITH/O/O/O	4	10.32	Y B	GK GK	ST	960719	SHHXTV
0112	LIMBOG	960806	SMITH/P/P/P	4	10.32	Y B	GK GK	ST	960719	SHHZDR
0114	LIMBOG	960805	SMITH/Q/Q/Q	4	10.32	Y B	GK GK	ST	960719	SHHBHG
0112	LIMBOG	960806	SMITH/R/R/R	4	10.32	Y B	GK GK	ST	960719	SHIKSQ
0112	LIMBOG	960806	SMITH/S/S/S	4	10.32	Y B	GK GK	ST	960719	SHIMFV
0112	LIMBOG	960806	SMITH/T/T/T	4	10.32	Y B	GK GK	ST	960719	SHIOKO
0112	LIMBOG	960806	SMITH/U/U/U	4	10.32	Y B	GK GK	ST	960719	SHJSVS
0112	LIMBOG	960806	SMITH/V/V/V	4	10.32	Y B	GK GK	ST	960719	SHJWRJ
0112	LIMBOG	960806	SMITH/W/W/W	4	10.32	Y B	GK GK	ST	960719	SHJYJE
0112	LIMBOG	960806	SMITH/X/X/X	4	10.32	Y B	GK GK	ST	960719	SHJBSM
0112	LIMBOG	960806	SMITH/Y/Y/Y	4	10.32	Y B	GK GK	ST	960719	SHJDOS
0112	LIMBOG	960806	SMITH/Z/Z/Z	4	10.32	Y B	GK GK	ST	960719	SHJGYP
0112	LIMBOG	960806	STONE/C/V/B	4	10.32	Y B	GK GK	ST	960719	SHKRCJ

TOTALS: 120 309.60

REJECTIONS - UNDOCUMENTED NAMES. UNABLE TO FIND ON HOST SYSTEM.

**Sound Technologies, Inc.
Comments to the Department of Transportation**

Exhibit of Example of High Net Cost (Churning Agencies)

The attached example of the report captioned "High Net Cost Agencies reflects agencies who have been detected for abusive booking activity. The audit trail for detecting these agencies is the high average cost per segment.

This report shows agencies who are Churning their bookings. The agency will book and cancel the same passenger on multiple segments all on the same day. Other infractions noted are violation of the airlines 24 hour ticketing rule.

These abusive actions play havoc with an airline's inventory.

AIR JAMAICA

System One - High Net Cost Agencies

JUNE 1997

Agencies with Net Booking Costs > 6.00 per Segment & Total Cost > 6.00

ARC/IATA	PseudCity	Booked	Cancel	Net	Cost PerNet	Co Agency Name	City
9750006	75	70	5	134.00	26.80	AG TRI STAR TRAVEL/ANTIGUA/SI	AG
9750005	78	69	9	138.53	15.39	AG WADADLI TRAVEL/AG/SI	AG
9850012	100	70	30	181.96	6.07	BB UNIVERSAL TRAVEL/SI	BB
5854201	10	8	2	13.86	6.93	BS MUNDYTOURS LTD/FREEPORT/SI	BS
9860008	6	6	0	11.46	-----	GD JOYS TRAVEL/GD/SI	GD
9860003	8	8	0	15.28	-----	GD M AND C TRAVEL/SI	GD
5960012	16	14	2	27.86	13.93	GY JIM BACCHUS TVL SVC LTD/GEORGETOWN GY/SI	GY
0072049	12	9	3	22.11	7.37	LC TRAVEL WORLD/CASTRIES ST LUCIA LC/SI	LC
9350088	16	12	4	29.48	7.37	TT FIRST CLASS TRAVEL/SI	TT
9352862	28	20	8	51.32	6.42	TT TRAVEL HOUSE LTD/SI	TT
0072350	4	4	0	7.37	-----	TT YUKLAN S TRAVEL SERVICE/POS/SI	TT
3354579	4	4	0	6.96	-----	US A AND S WORLD TRAVEL/SI	US
1053174	9	9	0	15.66	-----	US A NEW TRAVEL PARTNER INC/ORLANDO FL/SI	US
0366467	4	4	0	6.96	-----	US A WORLD OF TRAVEL LTD/MESA AZ/SI	US
0654586	4	4	0	6.96	-----	US ABSOLUTE TVL AND ADVENTURE/SI	US
1079699	37	30	7	59.13	8.45	US ACCENT TRAVEL AND TOURS/WINTER HAVEN/SI	US
4296138	4	4	0	6.96	-----	US ADVENTURE IN TRAVEL/CHS/SI	US
2187129	10	10	0	17.40	-----	US ADVENTURE VACATIONS/HUNT VALLEY MD/SI	US
3151681	56	41	15	93.39	6.23	US AIR LAND TRAVEL/BROWNSMILLS NJ/SI	US
0667101	28	28	0	48.72	-----	US AJA TRAVEL/DENVER CO/SI	US
2151932	12	10	2	14.78	7.39	US ALADDIN TRAVEL AGY INC/ANNAPOLIS MD/SI	US
4977192	7	7	0	11.10	-----	US ALL SEASONS TVL/KILMARNOCK VA/SI	US
1064645	8	8	0	13.92	-----	US ALL STAR TRAVEL INC/LEHIGH ACRES FL/SI	US
0074626	11	9	2	16.72	8.36	US AMBASSADOR TRAVEL SVCS INC/MIA/SI	US
1053350	4	4	0	6.96	-----	US AMERICAN INTERNATIONAL TVL/CLW/SI	US
1052281	10	8	2	15.92	7.96	US APPLE TRAVEL/WEST MIAMI FL/SI	US
4566732	25	20	5	37.02	7.40	US ARBOR TRAVEL WESTCHASE/HOUSTON TX/SI	US
0065867	6	6	0	10.44	-----	US AROUND THE WORLD TRAVEL/RIC/SI	US
0653508	10	10	0	14.08	-----	US ARVADA WEST TRAVEL AND CRUISE/ARVADA/SI	US
1054326	7	18	-11	13.26	-----	US ASTRO TRAVEL/TLH/SI	US
1176569	4	4	0	6.96	-----	US ATLANTA COMPANY TRAVEL/SI	US
1186282	4	4	0	6.96	-----	US ATLANTA INTERNATIONAL TRAVEL/ATL/SI	US
1154584	45	43	2	72.63	36.32	US ATLAS TRAVEL INC/DORAVILLE GA/SI	US
3188491	8	12	-4	11.24	-----	US BARCLAY TRAVEL/MOUNT LAUREL NJ/SI	US

0770657	-	8	10	-2	14.46	US WANDAS TRAVEL/BRIDGEPORT CT/S1 @ CT
3173466	-	52	56	-4	91.56	US WARDERS EDGE TRAVEL/FAIRHAVEN NJ/S1 @ NJ
3486196	-	12	30	-18	23.86	US WAYNE MULLIS TRAVEL/SALISBURY NC/S1 @ NC
3967137	-	4	4	0	6.96	US WESTMINSTER TRAVEL/LANSDOWNE PA/S1 @ PA
1063328	-	8	7	1	12.84	US WORLD CLASS TRAVEL SVC/GNV/QS @ FL
1160590	-	10	10	0	12.70	US WORLD EXPLORERS/ATLANTA GA/S1 @ GA
3366277	-	10	10	0	17.40	US WORLD TRADE TRAVEL/NEW YORK NY/S1 @ NY
5294306	-	4	6	-2	7.50	US WORLD TRAVEL SERVICE/MILWAUKEE WI/S1 @ WI
1157761	-	2141	1585	556	3455.19	US WORLD TRAVEL/ATLANTA GA/S1 @ GA
4951535	-	8	8	0	13.92	US WORLDNET TRAVEL/RICHMOND VA/S1 @ VA
1094638	-	25	23	2	25.32	US WORLDWIDE TRAVEL SERVICES/MIA/S1 @ FL
4259499	-	28	22	6	45.22	US YOUR TRAVEL AGENT INC/GSP/S1 @ SC
1455125	-	80	83	-3	117.93	US YOUR TRAVEL AGENT/NILES IL/S1 @ IL
2151617	-	20	18	2	33.72	US YOUR TRAVEL AGT OF BELTSVILLE/S1 @ MD
0073618	-	4	4	0	6.96	US YUNI TRAVEL/FLUSHING NY/S1 @ NY

Totals: 954 Net Segments from 294 Agencies at a cost of 16705.66

The average cost per net segment booked is 17.51

**Sound Technologies, Inc.
Comments to the Department of Transportation**

Exhibit of Example of Agency Churning

Churning as it relates to an agencies booking activity may be defined as booking and canceling on the same day with the same passenger and often the same itinerary. This type of activity has no value to an airline reservations. All it accomplishes is driving up the cost segment fees. Other churning activity will have adverse effect on an airlines inventory. An agency who books on one day and cancels beyond the 24 hour ticketing rule is in violation of that airlines ticketing rules and further may cause an airline to close its inventory availability as that booking could cause the availability of seats to be exhausted.

Please note on the examples attached that these agencies are booking and canceling the same passenger.

Sound Technologies Inc. AGRPT Version 4.0 - Mon Oct 06 14:38:33 1997

AIR JAMAICA

System One Detail for ARC/IATA #0693900

JUNE 1997

(US - COURTESY TVL AND CRUISE INC/DEN/S1)

Flt	CityPr	SgDate	Passenger Name	Segs	Cost	Cl	Stat	Acc	TrDate	Locatr
0056	ATLMBJ	970721	BRITO/DELLA	2	0.54	K C	HKXX	XX	970616	G45JGT
0056	ATLMBJ	970721	BRITO/DELLA	2	2.94	K B	NNHK	DA	970616	G45JGT
0056	ATLMBJ	970721	BRITO/DELLA	2	2.94	Q B	NNHK	DA	970616	G45JGT
0056	ATLMBJ	970721	BRITO/DELLA	2	0.54	Q C	HXXX	XX	970618	G45JGT
0031	MBJMIA	970801	BRITO/DELLA	2	2.94	Q B	NNHK	DA	970616	G45JGT
0031	MBJMIA	970801	BRITO/DELLA	2	0.54	Q C	HXXX	XX	970618	G45JGT
0057	MBJATL	970801	BRITO/DELLA	2	0.54	K C	HKXX	XX	970616	G45JGT
0057	MBJATL	970801	BRITO/DELLA	2	2.94	K B	NNHK	DA	970616	G45JGT

Sound Technologies Inc. AGRPT Version 4.0 - Mon Oct 06 14:38:50 1997

AIR JAMAICA

System One Detail for ARC/IATA #3963200

JUNE 1997

(US - DRESHER TRAVEL/MAPLE GLEN PA/S1)

Flt	CityPr	SgDate	Passenger Name	Segs	Cost	Cl	Stat	Acc	TrDate	Locatr
0018	PHLMBJ	970603	DIPRINZIO/E	2	0.54	Y C	HKXX	XX	970602	G454XX
0324	MBJNEG	970603	DIPRINZIO/E	2	0.54	Y C	HKXX	XX	970602	G454XX
0018	PHLMBJ	970605	DIPRINZIO/E	2	2.40	Y B	NNHK	PA	970602	G454XX
0018	PHLMBJ	970605	DIPRINZIO/E	2	0.54	Y C	HKXX	XX	970605	G454XX
0324	MBJNEG	970605	DIPRINZIO/E	2	2.40	Y B	NNHK	PA	970602	G454XX
0324	MBJNEG	970605	DIPRINZIO/E	2	0.54	Y C	HXXX	XX	970605	G454XX
0018	PHLMBJ	970618	DIPRINZIO/E	2	2.40	Y B	NNHK	PA	970605	G454XX
0018	PHLMBJ	970618	DIPRINZIO/E	2	0.54	Y C	HKXX	XX	970606	G454XX
0324	MBJNEG	970618	DIPRINZIO/E	2	2.40	Y B	NNHK	PA	970605	G454XX
0324	MBJNEG	970618	DIPRINZIO/E	2	0.54	Y C	HKXX	XX	970606	G454XX
0018	PHLMBJ	970805	DIPRINZIO/E	2	2.40	Y B	NNHK	PA	970606	G454XX
0324	MBJNEG	970805	DIPRINZIO/E	2	2.40	Y B	NNHK	PA	970606	G454XX

Sound Technologies Inc. AGRPT Version 4.0 - Mon Oct 06 14:37:46 1997

AIR JAMAICA

System One Detail for ARC/IATA #2187129

JUNE 1997

(US - ADVENTURE VACATIONS/HUNT VALLEY MD/S1)

Flt	CityPr	SgDate	Passenger Name	Segs	Cost	Cl	Stat	Acc	TrDate	Locat
0040	BWIMBJ	970714	ENTSMINGER/	2	2.94	Z B	NNHK	DA	970612	ENO5H
0040	BWIMBJ	970714	ENTSMINGER/	2	0.54	A C	HKXX	XX	970625	ENO5H
0040	BWIMBJ	970714	ENTSMINGER/	4	1.08	Z C	HKXX	XX	970625	ENO5H
0040	BWIMBJ	970714	ENTSMINGER/	2	2.94	A B	NNHK	DA	970625	ENO5H
0040	BWIMBJ	970714	ENTSMINGER/	2	2.94	Z B	NNHK	DA	970625	ENO5H
0041	MBJBWI	970718	ENTSMINGER/	2	2.94	Z B	NNHK	DA	970612	ENO5H
0041	MBJBWI	970718	ENTSMINGER/	2	0.54	A C	HKXX	XX	970625	ENO5H
0041	MBJBWI	970718	ENTSMINGER/	2	0.54	Z C	HKXX	XX	970625	ENO5H
0041	MBJBWI	970718	ENTSMINGER/	2	2.94	A B	NNHK	DA	970625	ENO5H

Sound Technologies Inc. AGRPT Version 4.0 - Mon Oct 06 14:41:45 1997

AIR JAMAICA

System One Detail for ARC/IATA #1160590

JUNE 1997

(US - WORLD EXPLORERS/ATLANTA GA/S1)

Flt	CityPr	SgDate	Passenger Name	Segs	Cost	Cl	Stat	Acc	TrDate	Locatr
0058	ATLMBJ	970612	HARPER/JOHN	1	0.27	Y C	GKXX	XX	970604	GLOROP
0057	MBJATL	970617	HARPER/JOHN	1	0.27	Y C	GKXX	XX	970604	GLOROP
0058	ATLMBJ	970612	HARPER/KATH	1	1.00	Y B	GKGG	PS	970604	GLOROP
0057	MBJATL	970617	HARPER/KATH	1	1.00	Y B	GKGG	PS	970604	GLOROP
0058	ATLMBJ	970707	HOLLAND/MAR	1	1.00	Y B	GKGG	PS	970626	GYJS4D
0058	ATLMBJ	970707	HOLLAND/MAR	1	0.27	Y C	GKXX	XX	970626	GYJS4D
0059	MBJATL	970714	HOLLAND/MAR	1	1.00	Y B	GKGG	PS	970626	GYJS4D
0059	MBJATL	970714	HOLLAND/MAR	1	0.27	Y C	GKXX	XX	970626	GYJS4D
0058	ATLMBJ	970613	SHADEED/DAN	1	1.00	Y B	GKGG	PS	970605	GV1BEZ
0058	ATLMBJ	970613	SHADEED/DAN	1	0.27	Y C	GKXX	XX	970605	GV1BEZ
0057	MBJATL	970620	SHADEED/DAN	1	1.00	Y B	GKGG	PS	970605	GV1BEZ
0057	MBJATL	970620	SHADEED/DAN	1	0.27	Y C	GKXX	XX	970605	GV1BEZ
0058	ATLMBJ	970708	TRIMBLE/CAR	1	1.00	Y B	GKGG	PS	970626	G1MNNT
0058	ATLMBJ	970708	TRIMBLE/CAR	1	0.27	Y C	GKXX	XX	970626	G1MNNT
0057	MBJATL	970715	TRIMBLE/CAR	1	1.00	Y B	GKGG	PS	970626	G1MNNT
0057	MBJATL	970715	TRIMBLE/CAR	1	0.27	Y C	GKXX	XX	970626	G1MNNT
0058	ATLMBJ	970611	VETETO/LANE	1	1.00	Y B	GKGG	PS	970603	FGVPWT
58	ATLMBJ	970611	VETETO/LANE	1	0.27	Y C	GKXX	XX	970603	FGVPWT
0059	MBJATL	970625	VETETO/LANE	1	1.00	Y B	GKGG	PS	970603	FGVPWT
0059	MBJATL	970625	VETETO/LANE	1	0.27	Y C	GKXX	XX	970603	FGVPWT

**Sound Technologies, Inc.
Comments to the Department of Transportation**

Exhibit of Example of Suspect Passengers

The attached Suspect Passenger Report shows how agencies will book segments using suspect names.

Often reports will reflect Mouse/Mickey; Mouse/Minnie; Weiser/Bud; Test/; NoName; or TBA. These booking activities are performed mostly for training purposes. Although each CRS system has a training mode, their subscribers are not advised to use it for training activity.

As these suspect passenger names would never be accepted at an airport check in position, these bookings are worthless. The airline is forced to accept segment fees for these type transactions.

AIR JAMAICA

System One - Suspect Passenger Name Report

JUNE 1997

Flt	Cities	SgDate	Passenger	#	Cost	Cl	Stat	Access	Locatr	TzDate	ARC/IAT	PseudCity	Agency
0058	ATLMBJ	971001	TEST/GEORGE	5	1.35	Z	HNKK	C	XX	HICBVD	970606	US 1153573	- VACATION EXPRESS/ATLANTA GA/S1 & GA
0058	ATLMBJ	971001	TEST/GEORGE	5	7.35	Z	NNHK	B	DA	HICBVD	970606	US 1153573	- VACATION EXPRESS/ATLANTA GA/S1 & GA
0058	ATLMBJ	971023	TEST/BARNEY	2	0.54	Q	HNKK	C	XX	HIDK53	970611	US 1153573	- VACATION EXPRESS/ATLANTA GA/S1 & GA
0058	ATLMBJ	971023	TEST/BARNEY	2	2.40	Q	NNHK	B	PA	HIDK53	970611	US 1153573	- TOWN AND COUNTRY WORLD TRAVEL/S1 & NY
0016	JFKIN	970701	TEST/LUIS	1	1.47	M	HNKK	B	XX	GYSACR	970605	US 3387895	- TOWN AND COUNTRY WORLD TRAVEL/S1 & NY
0016	JFKIN	970701	TEST/LUIS	1	1.47	M	NNHK	B	DA	GYSACR	970605	US 3387895	- TOWN AND COUNTRY WORLD TRAVEL/S1 & NY
0016	JFKIN	970705	TEST/MIRTH	2	2.94	M	NNHK	B	DA	ELY2XD	970623	US 3387895	- EMPRESS TRAVEL/NYC/S1 & NY
0010	JFKMBJ	970702	TEST/P/M	2	2.94	M	NNHK	B	DA	GKOBVB	970610	US 3361372	- EMPRESS TRAVEL/NYC/S1 & NY
0010	JFKMBJ	970702	TEST/P/M	2	0.54	M	HNKK	C	XX	GKOBVB	970611	US 3361372	- EMPRESS TRAVEL/NYC/S1 & NY
0010	JFKMBJ	970908	DOE/JOHN	2	2.94	Z	NNHK	B	DA	ETRLCP	970623	US 3366050	- FRIENDLY HOLIDAYS/LAKE SUCCESS NY/S1 & NY
0010	JFKMBJ	970908	DOE/JOHN	2	2.94	Z	NNHK	B	DA	ETRLCP	970623	US 3366050	- FRIENDLY HOLIDAYS/LAKE SUCCESS NY/S1 & NY
0010	JFKMBJ	970908	DOE/JOHN	2	0.54	Z	HNKK	C	XX	ETRLCP	970623	US 3366050	- TOWN AND COUNTRY WORLD TRAVEL/S1 & NY
0017	KINJFK	970720	TEST/LUIS	1	0.27	M	HNKK	C	XX	GYSACR	970605	US 3387895	- TOWN AND COUNTRY WORLD TRAVEL/S1 & NY
0015	KINJFK	970830	TEST/MIRTH	1	1.47	M	NNHK	B	DA	GYSACR	970605	US 3387895	- TOWN AND COUNTRY WORLD TRAVEL/S1 & NY
0015	KINJFK	970830	TEST/MIRTH	1	1.47	M	NNHK	B	DA	GYSACR	970605	US 3387895	- TOWN AND COUNTRY WORLD TRAVEL/S1 & NY
0059	MBJATL	971008	TEST/GEORGE	2	2.94	M	NNHK	B	DA	ELY2XD	970623	US 3387895	- TOWN AND COUNTRY WORLD TRAVEL/S1 & NY
0059	MBJATL	971008	TEST/GEORGE	2	2.94	M	NNHK	B	DA	ELY2XD	970623	US 3387895	- TOWN AND COUNTRY WORLD TRAVEL/S1 & NY
0059	MBJATL	971027	TEST/BARNEY	5	1.35	Z	HNKK	C	XX	HICBVD	970606	US 1153573	- VACATION EXPRESS/ATLANTA GA/S1 & GA
0059	MBJATL	971027	TEST/BARNEY	5	7.35	Z	NNHK	B	DA	HICBVD	970606	US 1153573	- VACATION EXPRESS/ATLANTA GA/S1 & GA
0059	MBJATL	971027	TEST/BARNEY	2	0.54	Q	HNKK	C	XX	HIDK53	970611	US 1153573	- VACATION EXPRESS/ATLANTA GA/S1 & GA
0059	MBJATL	971027	TEST/BARNEY	2	2.40	Q	NNHK	B	PA	HIDK53	970611	US 1153573	- VACATION EXPRESS/ATLANTA GA/S1 & GA
0059	MBJATL	971027	TEST/BERNAR	2	0.54	Q	TKKK	C	XX	HIDK53	970613	US 1153573	- VACATION EXPRESS/ATLANTA GA/S1 & GA
0011	MBJFK	970617	TEST/P/M	2	2.94	B	NNHK	B	DA	GKOBVB	970610	US 3361372	- EMPRESS TRAVEL/NYC/S1 & NY
0011	MBJFK	970617	TEST/P/M	2	0.54	B	HNKK	C	XX	GKOBVB	970611	US 3361372	- EMPRESS TRAVEL/NYC/S1 & NY
0011	MBJFK	970914	DOE/JOHN	2	2.94	Z	NNHK	B	DA	ETRLCP	970623	US 3366050	- FRIENDLY HOLIDAYS/LAKE SUCCESS NY/S1 & NY
0011	MBJFK	970914	DOE/JOHN	2	2.94	Z	NNHK	B	DA	ETRLCP	970623	US 3366050	- FRIENDLY HOLIDAYS/LAKE SUCCESS NY/S1 & NY
0019	MBJFK	970817	NONAME/A	1	0.54	Z	HNKK	C	XX	ETRLCP	970625	US 3170340	- IMPERIAL TRAVEL/CAMDEN NJ/S1 & NJ
0018	PHLMBJ	970807	NONAME/A	1	1.47	M	NNHK	B	DA	FET3EP	970618	US 3170340	- IMPERIAL TRAVEL/CAMDEN NJ/S1 & NJ
0073	PTYKIN	970712	TEST/ONE	1	1.47	B	NNHK	B	DA	FET3EP	970618	US 3170340	- ISLAND HOLIDAYS LTD/KINGSTON JM/S1 & JM
0073	PTYKIN	970712	TEST/ONE	1	0.27	B	HNKK	C	XX	FIXLLL	970613	JM 8571051	- ISLAND HOLIDAYS LTD/KINGSTON JM/S1 & JM
0073	PTYKIN	970712	TEST/ONE	1	1.37	B	LEKK	B	PA	FIXLLL	970613	JM 8571051	- ISLAND HOLIDAYS LTD/KINGSTON JM/S1 & JM

This report represents 58 segments costing 51.68

**Sound Technologies, Inc.
Comments to the Department of Transportation**

Exhibit of Examples of Fictitious Passenger Names

Another booking activity that causes adverse effect on an airlines inventory are speculative bookings. In this case, the agency is attempting to block space. An audit trail is to look for bookings that have the passenger surname with a backspace/ sign , a character, /another character/and another character.

Such that the booking could look like Jones/A/B/C/D with multiple passenger count and related segment fee charges. If these speculative bookings are never ticketed or canceled, this will contribute to an airlines NO SHOWs (empty seats upon departure). The value of this abusive activity is far more expensive to the airline as their revenue is reduced by the value of the abusive booking.

AIR JAMAICA

System One - Fictitious Passenger Name Report

JUNE 1997

Flt	Cities	SgDate	Passenger	#	Cost	Cl	Stat	Access	Locatr	TrDate	ARC/IAT	Pseudocity	Agency
0056	ATLMBJ	970708	RUBY/R/M/V	5	2.75	B	NNPN	B	RQ	HOW20F	970617	US	JAMPORT TRAVEL/DECATUR GA/S1 & GA
0058	ATLMBJ	970618	KOW/M/K	2	0.54	Z	HKKK	C	XX	HKKYV	970606	US	WORLD TRAVEL/ATLANTA GA/S1 & GA
0056	ATLMBJ	971228	SHIELDS/B/J	2	2.94	B	NNEK	B	DA	HFV5IB	970611	US	RAY WORLDWIDE TRAVEL/NEWPORT NEWS/S1 & VA
0058	ATLMBJ	970813	BLAKSLER/A/	4	4.80	H	NNEK	B	PA	EP2YQD	970612	US	TRAVEL AGENTS INTL/TWIN FALLS ID/S1 & ID
0058	ATLMBJ	971220	CHUNG/A/B/C	4	5.88	M	NNEK	B	DA	F3212N	970613	US	TRAVEL AGENTS INTERNATIONAL/NC/S1 & NC
0058	ATLMBJ	971220	LEE/A/B/C/D	4	5.88	M	NNEK	B	DA	F3212N	970613	US	TRAVEL AGENTS INTERNATIONAL/NC/S1 & NC
0058	ATLMBJ	970801	SAMUELS/S/C	2	1.10	K	NNPN	B	RQ	G1ZR2Z	970616	US	JAMPORT TRAVEL/DECATUR GA/S1 & GA
0056	ATLMBJ	970705	BOWLER/A/B/	5	7.35	B	NNEK	B	DA	G4XBXJ	970620	US	INTERNATIONAL TOURS/HICKORY NC/S1 & NC
0058	ATLMBJ	970712	COTTON/A/B/	4	1.08	M	HKKK	C	XX	GOACBN	970620	US	DRUID HILLS TRAVEL/S1 & GA
0058	ATLMBJ	970712	COTTON/A/B/	4	1.08	M	HKKK	C	XX	GOACBN	970620	US	DRUID HILLS TRAVEL/S1 & GA
0058	ATLMBJ	970712	COTTON/A/B/	4	5.88	B	NNEK	B	DA	GOACBN	970620	US	DRUID HILLS TRAVEL/S1 & GA
0058	ATLMBJ	970712	COTTON/A/B/	4	4.80	M	NNEK	B	PA	GOACBN	970620	US	DRUID HILLS TRAVEL/S1 & GA
0056	ATLMBJ	970704	SPECIALS/A/	2	2.94	B	NNEK	B	DA	GOACBN	970625	US	ABC'S OF TRAVEL AND CRUISES/PDX/S1 & OR
0056	ATLMBJ	970704	SPECIALS/A/	2	0.54	B	HKKK	C	XX	GOACBN	970625	US	ABC'S OF TRAVEL AND CRUISES/PDX/S1 & OR
0056	ATLMBJ	970704	MANNING/D/T	2	2.94	Z	NNEK	B	DA	GOACBN	970626	US	WORLD TRAVEL/ATLANTA GA/S1 & GA
0058	ATLMBJ	970812	EREPON/N/M	2	2.40	B	NNEK	B	PA	HAGZOB	970626	US	JAMPORT TRAVEL/DECATUR GA/S1 & GA
0058	ATLMBJ	970812	EREPON/N/M	2	0.54	B	HKKK	C	XX	HAGZOB	970626	US	JAMPORT TRAVEL/DECATUR GA/S1 & GA
0058	ATLMBJ	970705	BOWLER/A/B/	5	1.35	B	HKKK	C	XX	G4XBXJ	970627	US	INTERNATIONAL TOURS/HICKORY NC/S1 & NC
0090	BGIJFK	970608	BRIDGET/M/M	2	2.94	M	NNEK	B	DA	FLPKZJ	970604	US	EVERYDAY TRAVEL INC/MIDDLE ISLAND NY/S1 & NY
0090	BGIJFK	970608	BRIDGET/M/M	2	0.54	M	HKKK	C	XX	FLPKZJ	970604	US	EVERYDAY TRAVEL INC/MIDDLE ISLAND NY/S1 & NY
0091	BGIJFK	970810	MAIO/A/B	3	3.60	B	NNEK	B	PA	HP51TV	970617	US	FIVE STAR TV/JACKSONVILLE FL/S1 & FL
0092	BGIMIA	970808	SINGH/J/NAT	2	2.94	B	NNEK	B	DA	HP51TV	970617	US	FIVE STAR TV/JACKSONVILLE FL/S1 & FL
0090	BGIMIA	970826	EREPON/N/M	2	0.54	B	HKKK	C	XX	HAGZOB	970626	US	FORT MYERS TRAVEL AGENCY INC/FMY/S1 & FL
0090	BGIMIA	970826	EREPON/N/M	2	2.40	Z	NNEK	B	PA	HAGZOB	970626	US	FORT MYERS TRAVEL AGENCY INC/FMY/S1 & FL
0040	BWIMBJ	970710	KOMBE/A/MAR	2	2.94	B	NNEK	B	PA	HP51TV	970617	US	JAMPORT TRAVEL/DECATUR GA/S1 & GA
0040	BWIMBJ	970821	JONES/C/B/V	2	0.54	B	HKKK	C	XX	HAGZOB	970626	US	JAMPORT TRAVEL/DECATUR GA/S1 & GA
0040	BWIMBJ	970627	JONES/A/B	2	1.10	B	SPPN	B	RQ	FC0051	970624	US	UNIGLOBE BUSINESS PLUS TRAVEL/FT WASH/S1 & MD
0040	BWIMBJ	970627	JONES/A/B	2	4.92	B	NNEK	B	DA	HRMGRH	970617	JM	PLACES TO GO/FLL/S1 & FL
0018	EWKINJ	970715	FRANCIS/M/J	3	0.54	B	HKKK	C	XX	EQQ2VJ	970602	US	OHAN TRAVEL SERVICE/WHEATON MD/S1 & MD
0018	EWKINJ	970613	NOONAN/A/B	2	2.94	Y	NNEK	B	DA	FC0051	970624	US	OHAN TRAVEL SERVICE/WHEATON MD/S1 & MD
0018	EWKINJ	970613	NOONAN/A/B	2	0.54	B	HKKK	C	XX	EQQ2VJ	970602	US	OHAN TRAVEL SERVICE/WHEATON MD/S1 & MD
0018	EWKINJ	970613	NOONAN/A/B	2	2.94	B	NNEK	B	DA	EQQ2VJ	970602	US	OHAN TRAVEL SERVICE/WHEATON MD/S1 & MD
0018	EWKINJ	970613	NOONAN/A/B	2	5.88	B	NNEK	B	DA	ENVUD2	970602	US	OHAN TRAVEL SERVICE/WHEATON MD/S1 & MD
0018	EWKINJ	970613	NOONAN/A/B	2	1.08	B	HKKK	C	XX	ENVUD2	970602	US	OHAN TRAVEL SERVICE/WHEATON MD/S1 & MD
0018	EWKINJ	970613	NOONAN/A/B	2	2.94	M	NNEK	B	DA	FLVPLR	970609	US	OHAN TRAVEL SERVICE/WHEATON MD/S1 & MD
0018	EWKINJ	970613	NOONAN/A/B	2	2.94	M	NNEK	B	DA	GB2QYD	970613	US	OHAN TRAVEL SERVICE/WHEATON MD/S1 & MD
0018	EWKINJ	970613	NOONAN/A/B	2	2.94	M	NNEK	B	DA	F2030X	970619	US	OHAN TRAVEL SERVICE/WHEATON MD/S1 & MD
0018	EWKINJ	970613	NOONAN/A/B	2	9.82	Z	NNEK	B	DA	GIONSR	970619	US	OHAN TRAVEL SERVICE/WHEATON MD/S1 & MD
0018	EWKINJ	970613	NOONAN/A/B	2	1.62	Z	HKKK	C	XX	GIONSR	970619	US	OHAN TRAVEL SERVICE/WHEATON MD/S1 & MD
0018	EWKINJ	970613	NOONAN/A/B	2	8.82	Z	NNEK	B	DA	GIONSR	970619	US	OHAN TRAVEL SERVICE/WHEATON MD/S1 & MD
0018	EWKINJ	970613	NOONAN/A/B	2	2.94	M	NNEK	B	DA	HE010P	970621	US	OHAN TRAVEL SERVICE/WHEATON MD/S1 & MD
0018	EWKINJ	970613	NOONAN/A/B	2	5.00	Y	GKXK	B	PS	BOXS3T	970623	US	OHAN TRAVEL SERVICE/WHEATON MD/S1 & MD
0018	EWKINJ	970613	NOONAN/A/B	2	4.41	B	NNEK	B	DA	EOFLJY	970623	US	OHAN TRAVEL SERVICE/WHEATON MD/S1 & MD
0018	EWKINJ	970613	NOONAN/A/B	2	0.54	Z	HKKK	C	XX	FZSTT3	970630	US	OHAN TRAVEL SERVICE/WHEATON MD/S1 & MD
0018	EWKINJ	970613	NOONAN/A/B	2	2.94	Z	NNEK	B	DA	FZSTT3	970630	US	OHAN TRAVEL SERVICE/WHEATON MD/S1 & MD
0018	EWKINJ	970613	NOONAN/A/B	2	2.94	Z	NNEK	B	DA	FZSTT3	970630	US	OHAN TRAVEL SERVICE/WHEATON MD/S1 & MD
0018	EWKINJ	970613	NOONAN/A/B	2	2.94	Z	NNEK	B	DA	FZSTT3	970630	US	OHAN TRAVEL SERVICE/WHEATON MD/S1 & MD
0018	EWKINJ	970613	NOONAN/A/B	2	2.94	Z	NNEK	B	DA	FZSTT3	970630	US	OHAN TRAVEL SERVICE/WHEATON MD/S1 & MD
0088	FLKINJ	970620	BURKE/D/F	2	2.94	B	NNEK	B	DA	EROPQZ	970602	US	OHAN TRAVEL SERVICE/WHEATON MD/S1 & MD
0088	FLKINJ	970723	ARIOLA/A/B	2	2.94	B	NNEK	B	DA	EROPQZ	970602	US	OHAN TRAVEL SERVICE/WHEATON MD/S1 & MD
0088	FLKINJ	971218	JOHNSON/A/B	6	1.62	M	HKKK	C	XX	GTQDMB	970610	US	OHAN TRAVEL SERVICE/WHEATON MD/S1 & MD
0088	FLKINJ	971218	JOHNSON/A/B	6	8.82	M	NNEK	B	DA	GRFTTF	970610	US	OHAN TRAVEL SERVICE/WHEATON MD/S1 & MD
0088	FLKINJ	971218	JOHNSON/A/B	6	2.43	B	HKKK	C	XX	FTL	970612	BS	OHAN TRAVEL SERVICE/WHEATON MD/S1 & MD

**Sound Technologies, Inc.
Comments to the Department of Transportation**

**Exhibit of Examples of Violations of
the Department of Transportation
Adequate Information Rule**

In the Department of Transportation Computer Reservation (CRS) Regulations (Part 255) published on December 11, 1992, the Department of Transportation defined "adequate or minimum information that must be included for each segment.

The items to be required shall consist of the following for each segment: PNR record locator number, passenger name, booking status, agency ARC number, pseudo-city code, CRS transaction date, city pair information, flight number, flight date, class of service and type of CRS booking.

The following examples Invalid Flight Number report show Open Segment Bookings which reflect no Flight number and in some instances no flight date. These bookings are in violation of the adequate information rule as they do not contain a Flight Number or Flight date. There are no assurances that these open segments will ever be eventually utilized by the passenger to fly on the airline.

The other example of Non ARC IATA agencies depict bookings using a fictitious ARC or IATA number. As this report shows agency identification numbers of "999999999". This booking activity is in violation of the adequate information rule as they do not contain an ARC number.

Sound Technologies Inc. CRSAUDIT Version 4.4 - Fri Oct 03 15:16:47 1997

AIR JAMAICA

Sabre - Invalid Flight Number Report

JUNE 1997

Flt	Cities	Date	Passenger	#	Cl	Stat	Access	Cost	Locatr	ARC/IAT	Pseu.	City	Agency
0000	MBJ	980117	ANDERSON/IDA	1	Y	DSDS	B	2.65	STJLFY	1089448	AM50	US	PLANT CITY TRAVEL
0000	MCO	980117	ANDERSON/IDA	1	Y	DSDS	B	2.65	STJLFY	1089448	AM50	US	PLANT CITY TRAVEL
0000	JFK	971020	WILLIAMSCAMPBELL/GLO	1	V	DSDS	B	2.65	UYHHC	3352052	A402	US	TRAVEL NETWORK
0000	JFK	971020	WILLIAMSCAMPBELL/GLO	1	B	DSDS	B	2.65	UYHHC	3352052	A402	US	TRAVEL NETWORK
0000	JFK	971020	WILLIAMSCAMPBELL/GLO	1	B	DSDS	C	-2.53	UYHHC	3352052	A402	US	TRAVEL NETWORK
0000	KIN	970909	HEBLOP/COVITNEY	1	V	DSDS	B	2.65	UVDIRY	3352493	ASPI	US	ALERTON TRAVEL
0000	MBJ	980000	LEWIS/YVORNE	2	V	DSDS	B	5.30	RWZBRQ	3167840	A9N0	US	GREENWALD TRAVEL
0000	MBJ	970815	LAWSON/GIOVANNI	1	Y	DSDS	B	3.02	QDQMLJ	5878888	BD12	TC	PROVO TRAVEL
0000	MBJ	970712	WALTERS/LMRS/KENDES	2	Y	DSDS	B	6.04	SDSPVK	5878888	BD12	TC	PROVO TRAVEL
0000	KIN	970712	WALTERS/LMRS/KENDES	2	Y	DSDS	B	6.04	SDSPVK	5878888	BD12	TC	PROVO TRAVEL
0000	PLS	970816	PELLACHI/DAWNMS	1	Y	DSDS	B	3.02	UVFRZR	5878888	BD12	TC	PROVO TRAVEL
0000	MBJ	980000	BELL/MILLICENT	2	V	DSDS	B	5.30	UYMJUK	3359272	BI11	US	CHARISMA TRAVEL
0000	KIN	980000	DALEY/SHAREKA	1	V	DSDS	B	2.65	RCWACC	3359272	BI11	US	CHARISMA TRAVEL
0000	JFK	980000	BLACKWOOD/NERTELLIN	1	V	DSDS	B	2.65	QEPOLD	3359272	BI11	US	CHARISMA TRAVEL
0000	JFK	970920	RICHARDS/KEADIN	1	V	DSDS	B	2.65	QDHQTE	3359272	BI11	US	CHARISMA TRAVEL
0000	KIN	980226	HENRY/UNA	2	V	DSDS	B	5.30	RACESJ	3359272	BI11	US	CHARISMA TRAVEL
0000	KIN	980430	HENRY/UNA	2	V	DSDS	B	5.30	RACESJ	3359272	BI11	US	CHARISMA TRAVEL
0000	KIN	980430	HENRY/UNA	2	V	DSDS	C	-5.06	RACESJ	3359272	BI11	US	CHARISMA TRAVEL
0000	KIN	970820	DIGGS/ANGELLA	1	V	DSDS	C	-2.53	QFTGRD	3359272	BI11	US	CHARISMA TRAVEL
0000	JFK	980504	BLACKWOOD/NERTELLIN	1	V	DSDS	C	-2.53	QEPOLD	3359272	BI11	US	CHARISMA TRAVEL
0000	KIN	971006	JACKSON/EVELYN	1	V	DSDS	B	2.65	QKRPTV	9999999	BO83	US	RONNIE'S WORLD OF TVL AND TRS
0000	KIN	980407	LEGISTER/CURLINE	1	V	DSDS	B	2.65	SBRIQV	9999999	BO83	US	RONNIE'S WORLD OF TVL AND TRS
0000	JFK	971004	MCKINLEY/ESTELLA	1	V	DSDS	B	2.65	QSULTN	9999999	BO83	US	RONNIE'S WORLD OF TVL AND TRS
0000	KIN	971201	GREEN/ENA	1	V	DSDS	B	2.65	TANRZZ	9999999	BO83	US	RONNIE'S WORLD OF TVL AND TRS
0000	KIN	971201	GREEN/ENA	1	V	DSDS	C	-2.53	SWSFLH	1064838	BW02	US	JC TRAVEL
0000	KIN	980000	GAYLE/JAVAN	1	V	DSDS	C	-2.53	SWSFLH	1064838	BW02	US	JC TRAVEL
0000	JFK	971111	POWELL/MARION	1	V	DSDS	B	2.65	QLEPZX	0789082	B1J0	US	USTRAVEL
0000	JFK	971023	POWELL/MARION	1	V	DSDS	B	2.65	TNWVFN	3351040	B3L3	US	AMERICAN TOURS LTD
0000	JFK	971111	POWELL/MARION	1	V	DSDS	C	-2.53	TNWVFN	3351040	B3L3	US	AMERICAN TOURS LTD
0000	KIN	971212	CHARLES/CRYSTALCHD	1	V	DSDS	B	2.65	QEMIEA	3386436	B7I0	US	CARIBBEAN-AMERICAN TRAVEL #1
0000	JFK	980220	JNBAPTISTE/CASILDA	1	Y	DSDS	C	-2.53	TSJVLU	3386436	B7I0	US	CARIBBEAN-AMERICAN TRAVEL #1
0000	UVF	970716	GOLEMIS/NIKIMISS	1	V	DSDS	B	2.65	THIYIS	3162792	B970	US	NATIONAL TRAVEL SERVICE

-BDL-BDL

Sound Technologies Inc. CRSAUDIT Version 4.4 - Mon Oct 06 11:25:01 1997

AIR JAMAICA

Sabre - Invalid Iata/Arc Agency Summary

JUNE 1997

Co	Segs	Cost	ARC/LATA	Agency Name @ City	Agencies With Activity of at least 1 Gross Segments
AG	22	8.24	9999999	F6J4	CARIB WORLD TRAVEL @ ANTIGUA
AG	10	27.50	9999999	N074	CARIB WORLD TRAVEL @ ANTIGUA
AN	4	12.08	9999999	G9T4	TRAVEL PLANNERS II @ ST. MAARTEN, N.A
AR	8	13.96	9999999	F1R4	NEXT TRAVEL AND BUSINESS S.R.L @ BUENOS AIRES
AR	8	13.96	9999999	Z4F3	SONRISAS @ BUENOS AIRES
AT	56	26.34	9999999	N523	EL-AL-CTO @ VIENNA
AU	10	20.26	9999999	S6F4	BURPENGARY TRAVELWORLD @ BURPENGARY
AU	8	0.56	9999999	I674	TRAVEL LINK AUSTRALIA @ MELBOURNE
BS	27	37.54	9999999	E1I4	RELIABLE TOURS AND TRAVEL LTD @ NASSAU BAHAMAS
BZ	2	6.84	9999999	E6V4	ICB @ BELIZE CITY
CA	4	0.24	9999999	3XX2	CARTA CONNECTION INC. @ TORONTO
CA	27	71.95	9999999	9JR4	MIRAGE TRAVEL AND TOURS @ ETOBICOKE
CA	4	12.20	9999999	NQ73	T.P.I. CANADA @ WINNIPEG
CH	3	3.29	9999999	N4W3	BTS REISEN @ VOLKETSUIL
CH	4	0.00	9999999	4TF3	GLOBE VOYAGES S.A @ PULLY
CL	2	0.14	9999999	W2M4	CARLSON WAGONLIT/FAO @ SANTIAGO
CL	8	27.36	9999999	C034	MEGATOUR @ ARICA
CO	5	3.70	9999999	X374	TROTAMUNDO @ CALI
DE	8	0.00	9999999	B7K3	PAL FLUGREISEN @ BERLIN
DO	2	0.14	9999999	H3U4	EDDYS TOURS @ REPUBLICA DOMINI
DO	3	10.26	9999999	I174	NP TRAVEL @ SANTO DOMINGO
FR	2	6.58	9999999	5AK1	QUASAR SEBPLEKOR 2 @ PARIS
FR	1	3.29	9999999	5FT1	QUASAR SUBEXPLOR 1 @ PARIS
GB	16	-5.72	9999999	DR03	AIR FLAIR LTD @ LONDON
GB	6	6.58	9999999	1QN2	AMERICAN EXPRESS @ CHISWICK, LONDON
GB	2	0.00	9999999	W6G4	BAKERS DOLPHIN @ BRISTOL
GB	4	13.17	9999999	W6H4	BAKERS DOLPHIN @ BRISTOL
GB	2	5.90	9999999	N3V4	FARNLEY TRAVEL @ LONDON
GB	3	9.88	9999999	S1Z4	STA TRAVEL LTD @ LONDON
GY	79	82.58	9999999	AA83	MUNESHWERS LTD TVL. SVC @ GEORGETOWN
GY	4	13.68	9999999	BR93	WORLDWIDE TVL. SERVICE LIMITED @ GEORGETOWN
HK	4	13.68	9999999	6GN3	GOODWAY TRAVEL LIMITED @ HONG KONG
HT	12	41.04	9999999	L6E4	MULTIVISION TRAVEL @ PETIONVILLE, HAI

**Sound Technologies, Inc.
Comments to the Department of Transportation**

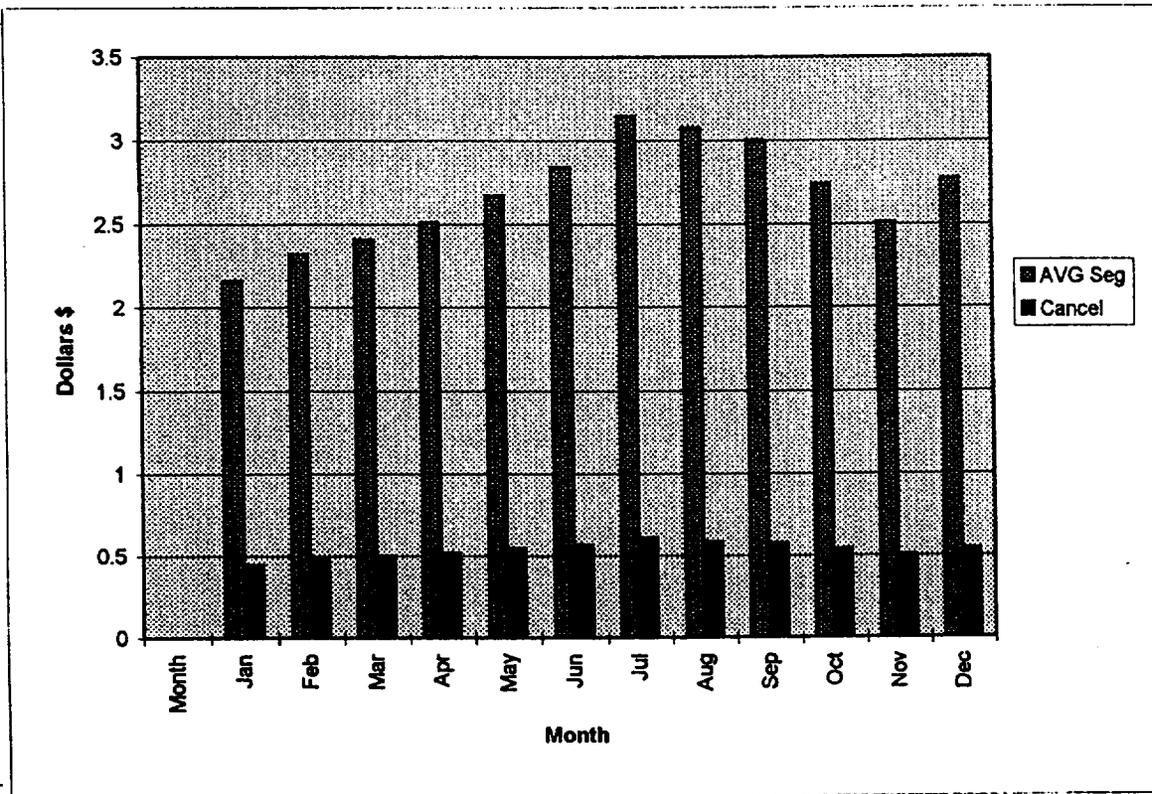
**Exhibit Showing the Effect that
Cancellations Have on Transactional
Based Booking Practices.**

The attached graph is based upon an Airlines actual CRS Segment Fee analysis. It was for the period January through December of 1993.

As you will note the higher the cancellation rate the higher the average segment fee cost.

**Analysis of Average Transaction Cost-Apollo
For the Year Ended December 31, 1993**

Month	AVG Seg Cost	Cancel %
Jan	\$ 2.16	44.61%
Feb	2.32	47.79%
Mar	2.41	49.87%
Apr	2.51	51.81%
May	2.67	54.60%
Jun	2.84	56.66%
Jul	3.15	60.64%
Aug	3.08	58.25%
Sep	3.00	57.27%
Oct	2.74	53.86%
Nov	2.51	50.37%
Dec	2.77	53.74%



**Analysis of Average Transaction Cost-Apollo
For the Year Ended December 31, 1993**

Month	AVG Seg Cost	Cancel %
Jan	\$ 2.16	44.61%
Feb	2.32	47.79%
Mar	2.41	49.87%
Apr	2.51	51.81%
May	2.67	54.60%
Jun	2.84	56.66%
Jul	3.15	60.64%
Aug	3.08	58.25%
Sep	3.00	57.27%
Oct	2.74	53.86%
Nov	2.51	50.37%
Dec	2.77	53.74%

