

59452

ORIGINAL

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

DEPT. OF TRANSPORTATION
Dockets
99 JUL 15 PM 3:56

Joint Application of)
)
ALITALIA-LINEE AEREE ITALIANE-)
S.p.A.)
and)
KLM ROYAL DUTCH AIRLINES)
and)
NORTHWEST AIRLINES, INC.)
)
for approval of and antitrust immunity for)
agreements pursuant to 49 U.S.C. §§ 41308)
and 41309)

Docket OST-99-5674 - / /

**JOINT RESPONSE OF ALITALIA-LINEE AEREE ITALIANE-S.P.A.,
KLM ROYAL DUTCH AIRLINES AND NORTHWEST AIRLINES, INC.
TO ORDER 99-5-10 AND NOTICE REQUIRING SUPPLEMENTAL INFORMATION
AND SUBMISSION UNDER RULE 39 CONFIDENTIAL TREATMENT MOTION**

Communications with respect to this document should be sent to:

Elliott M. Seiden
Vice President, Law & Government Affairs
David G. Mishkin
Vice President, International &
Regulatory Affairs
Megan Rae Poldy
Managing Director, Government Affairs
& Associate General Counsel
NORTHWEST AIRLINES, INC.
901 15th Street, N.W.
Suite 3 10
Washington, D.C. 20005
(202) 842-3 193

Richard D. Mathias
ZUCKERT, SCOUTT &
RASENBERGER, L.L.P.
888 Seventeenth Street, N.W.
Suite 600
Washington, D.C. 20006-3309
(202) 2988660

Attorneys for
ALITALIA-LINEE AEREE ITALIANE-
S.p.A.

Paul V. Mifsud
Vice President, Government &
Legal Affairs - USA
KLM ROYAL DUTCH AIRLINES
2501 M Street, N.W.
Washington, D.C. 20037
(202) 626-6717

Dated: July 15, 1999

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

Joint Application of)
)
ALITALIA-LINEE AEREE ITALIANE-)
S.p.A.)
and)
KLM ROYAL DUTCH AIRLINES)
and)
NORTHWEST AIRLINES, INC.)
)
for approval of and antitrust immunity for)
agreements pursuant to 49 U.S.C. §§ 41308)
and 41309)

Docket OST-99-5674

Dated: July 15, 1999

**JOINT RESPONSE OF ALITALIA-LINEE AEREE ITALIANE-S.P.A.,
KLM ROYAL DUTCH AIRLINES AND NORTHWEST AIRLINES, INC.
TO ORDER 99-5-10 AND NOTICE REQUIRING SUPPLEMENTAL INFORMATION
AND SUBMISSION UNDER RULE 39 CONFIDENTIAL TREATMENT MOTION**

Alitalia-Linee Aeree Italiane-S.p.A. (“Alitalia”), KLM Royal Dutch Airlines (“KLM”), and Northwest Airlines, Inc. (“Northwest”) (collectively the “Joint Applicants”) hereby jointly respond to the Department’s Order 99-5- 10 and Notice Requiring Supplemental Information.

In response to items A, B, and C of the Department’s information request contained in Order 99-5- 10, the Joint Applicants are separately submitting certain proprietary and sensitive corporate documents and information to the Department accompanied by a Motion for Confidential Treatment of those documents pursuant to Rule 39 of the Department’s Rules of Practice. The Joint Applicants have prepared indices relating to their respective confidential documents, which are attached hereto.

Responses

A. The requested documents are being submitted separately with a Motion for Confidential Treatment.

B. The requested documents are being submitted separately with a Motion for Confidential Treatment.

C. The requested Alitalia traffic data are being submitted separately with a Motion for Confidential Treatment.

D. Approval of the Northwest/KLM/Alitalia alliance will produce important pro-competitive effects on international aviation in several ways. The most direct effect on international competition will be a major expansion of services between the U.S. and Italy by U.S. carriers and their third-country alliance partners because approval of the alliance will “trigger” the open skies agreement between the U.S. and Italy. Open skies to Italy will bring new competitive services by the major U.S. international carriers from their established hubs in the U.S. These new services will include additional frequencies on routes already served on a restricted basis and first nonstop service in other significant markets.

American Airlines has demonstrated strong interest in introducing Chicago-Rome service and is likely to expand the frequency of its Chicago-Milan service. American has previously stated to the Department its interest in providing service to Italy from its hubs at Dallas/Ft. Worth and Miami. Delta Air Lines has stated its interest in expanding its Atlanta-Italy service to Milan as soon as possible. In addition, it will have the potential to expand its Cincinnati-Europe services to include Milan and/or Rome. United Air Lines has demonstrated its interest in adding Washington-Rome service to its current Washington-Milan service and is expected to introduce services to Milan and Rome from its principal hub at Chicago. Also, United will have the strong

potential to introduce direct flights to Milan and/or Rome from its major hubs at Denver and San Francisco. US Airways has demonstrated immediate interest in adding Milan to its growing list of Philadelphia-Europe services and has the potential to serve Italy from its other hubs at Charlotte and Pittsburgh. TWA will gain the opportunity to serve Italy from its St. Louis hub.

In addition to this impressive list of new nonstop services to Italy, Delta and United will provide new competitive services through the hubs of their European alliance partners. This will introduce new competition not only to Milan and Rome but also to the other significant traffic points in Italy. Delta will serve Italy on joint services with Air France and Austrian. Likewise, United will offer on-line services to all significant traffic points in Italy through its alliances with Lufthansa and SAS. The joint applicants anticipate also that American and British Airways will obtain and implement codesharing authority to provide joint on-line services between the U.S. and Italy. Simply by linking existing services, AA/BA could provide one-stop service via London between some 25 U.S. gateway cities and over a dozen cities in Italy.

Besides all the new competition due to the advent of open skies, grant of the application will enable the alliance itself to strengthen competition in the U.S.-Italy market and in transatlantic markets generally. Through this alliance, Northwest will be able to enter the U.S.-Italy market. Likewise, only through this alliance will Alitalia be able to remain fully effective as a competitor in the market. Only by joining an alliance with a U.S. carrier can Alitalia obtain efficient and effective access to U.S. traffic at points other than the seven gateways that it now serves. Moreover, in view of the immediate and major expansion of new U.S. carrier services resulting from open skies, joining this alliance is the only way Alitalia can meet the increased level of competition.

Aside from the effect on services in the U.S.-Italy market, approval of the alliance will enable Northwest/KLM/Alitalia together to become a stronger competitor in the overall transatlantic market. The existing Northwest/KLM alliance is smaller than the STAR alliance and the forthcoming alliance having Air France/Delta as its core. And, of course, it is much smaller than the “oneworld” alliance, which includes American, British Airways, Iberia, and Finnair, among others. Even with the addition of Alitalia, the Northwest/KLM/Alitalia alliance will remain significantly smaller than these other global alliances, but it will be strengthened so that it can compete effectively with them.

The larger size will produce economies of scale for more efficient operations. The larger scope of operations will produce broader geographic coverage and access to more potential traffic. By integrating route systems, the alliance will be able to offer more alternative routings and more frequency choices for passengers between the U.S. and points beyond Italy in Europe, the Middle East, and Africa. In short, the alliance carriers will be able to offer coordinated “single-carrier” services on a much broader and stronger basis than they could possibly do alone. Together they can compete with the other alliances in thousands of transatlantic city-pair markets and continue to grow. The benefits to competition of this approach are already demonstrated with the success of the existing Northwest/KLM alliance. Alone, neither provided any Detroit-Amsterdam service. Together, this summer they operate four daily wide-body roundtrip flights on the sector, serving passengers in thousands of city-pairs between points in the U.S. and points beyond Amsterdam.

Addressing the competitive effects in specific city-pairs of the expansion of the current alliance to include Alitalia, the absence of any negative effects is readily apparent. This alliance has no significant existing overlap. Northwest does not serve Italy, either directly or on a

codeshare basis. Therefore, the combination of Alitalia with Northwest does not have the potential to eliminate any competition. Likewise, Northwest does not compete with Continental in any U.S.-Italy city-pair market. Instead, the Northwest/Alitalia alliance introduces Northwest into the market as a positive competitive force. The effects are all pro-competitive, especially because the accompanying advent of open skies will dramatically and suddenly introduce other services, as described above.

KLM serves the U.S.-Italy market on a connecting basis via its hub in Amsterdam. KLM codeshares on Northwest's transatlantic flights and on domestic flights beyond the U.S. gateways. KLM's share of the U.S.-Italy market is small, approximately four percent. In the expanded alliance, Alitalia and KLM will cooperate in developing these services via Amsterdam. At the same time, however, the other alliances will use new rights under the open skies agreement to introduce similar U.S.-Italy services via their European hubs as well as direct U.S.-Italy flights.

D. Supplemental Request On Continental

Northwest and Continental have a Master Alliance Agreement that provides that Continental ultimately will join the transatlantic joint venture between Northwest and KLM (and, if this Joint Application is approved, between Northwest, KLM, and Alitalia). The Joint Applicants have not yet agreed upon the terms under which Continental would coordinate its commercial operations with those of the Joint Applicants. When such agreement is reached, the four carriers will present a new application to the Department for approval as necessary. Accordingly, the present application does not request authority to integrate Continental's transatlantic operations with those of the Joint Applicants.

Pending an agreement between the Joint Applicants and Continental to include Continental in the transatlantic joint venture, and provided that such agreement is approved and granted antitrust immunity by the Department, it is anticipated that the current arrangements between Alitalia and Continental, as twice approved and authorized by the Department, will continue. Alitalia and Continental will continue outside the transatlantic joint venture to codeshare under block-space arrangements and individually sell their respective seat capacity as competitors of one another.

Thus, approval of this application will have no adverse competitive effect in city-pair markets where Continental competes or has cooperative arrangements with Alitalia. The only effects will be positive in that approval will enable Alitalia to remain a viable competitor in transatlantic markets and enable U.S. carriers to enter and serve those markets under the open skies agreement.

E. At each of the Italian cities served by Alitalia, airport facilities, including gates and slots, are available without constraints to U.S. carriers who want to begin or increase services.

F. The primary service and equipment changes in U.S.-Italy markets anticipated by the joint applicants involve the establishment of new services connecting the route systems of Northwest and Alitalia. Because Northwest is the only major U.S. carrier that is not now authorized to serve Italy, no direct service is provided currently between Northwest's principal hubs, Detroit, Minneapolis/St. Paul and Memphis, and Italy. The alliance will enable the joint development of new nonstop services between Northwest's hubs and Alitalia's transatlantic gateways, Milan and Rome. In the first year of operations, the Joint Applicants plan to introduce daily nonstop flights between Detroit and both Milan and Rome. The optimal timing of

introduction of flights between Northwest's other domestic hubs and Milan and Rome is being evaluated.

These new transatlantic services between the U.S. and Italian gateways will enable the alliance to develop seamless connecting services for traffic between points throughout Northwest's domestic route system, on the one side, and, on the other side, Milan, Rome, and beyond to points served by Alitalia in Italy and other countries. The Joint Applicants will integrate their systems following the successful approach developed by the Northwest/KLM alliance. Coordination of schedules, passenger and baggage handling, and other service features will enable the alliance to provide the equivalent of new single-carrier services in thousands of connecting markets.

G. Approval of the joint application will have no effect on the Civil Reserve Air Fleet commitments of Northwest.

H. The labor effects of the proposed alliance will be positive, creating growth and expansion opportunities for each of the alliance partners, which will in turn create enhanced job opportunities and job security for Northwest employees. The parties anticipate having discussions regarding the provision by Northwest to Alitalia in the U.S. of certain ground handling, reservations and sales services.

In recently concluded labor negotiations, Northwest and its unions reached agreements which include comprehensive job security provisions for employees, including no-layoff protection for employees in job classifications covered by the ratified agreements.

As mentioned above, employees covered by ratified agreements have job security covenants that would prohibit layoff subject to specified exceptions. Notwithstanding the protection afforded by the job security covenants, in the event any employee is adversely

affected by alliance activities, their entitlement to compensation will be governed by the respective collective bargaining agreement, or if a management employee, company policy.

I. The labor dispute between Alitalia and the IAM stems from the collective bargaining process originating in 1990 when the parties exchanged proposals, including Alitalia's proposal to utilize a third-party handler for its airport operations. After years of good faith negotiations and following exhaustion of the procedures designated by the Railway Labor Act, the parties were released to engage in self-help in September 1993. At that time, Alitalia implemented its proposal and the IAM chose to strike. No lockout occurred. In subsequent negotiations the IAM refused to accept Alitalia's right to subcontract, although it has reached such agreements with other airlines.

In 1997 the parties resumed negotiations in the interest of finding a solution and providing a measure of compensation for those employees whose jobs were lost as a result of the subcontracting and the strike. Alitalia presented proposals for severance pay and substantial pension enhancements for the affected former employees but these proposals were rejected. At no time has Alitalia violated the spirit or intent of the Railway Labor Act. Rather, Alitalia continues) to seek a fair solution including provision of compensation benefits for the affected employees.

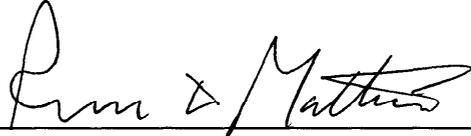
In May, 1999, Alitalia proposed to the IAM that the parties resume once again efforts to resolve their labor dispute. Since then Alitalia and the IAM have entered into formal discussions to negotiate a mutually satisfactory resolution and these discussions are ongoing. The next meeting is scheduled for August 5 and 6, 1999.

Alitalia has been and remains committed to resolving this matter on fair terms to the affected employees through good faith negotiations directly between the two parties, Alitalia and the IAM.



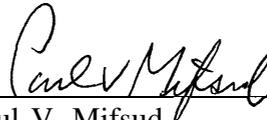
Elliott M. Seiden
Vice President, Law & Government Affairs
David G. Mishkin
Vice President, International &
Regulatory Affairs
Megan Rae Poldy
Managing Director, Government Affairs
& Associate General Counsel
NORTHWEST AIRLINES, INC.
901 15th Street, N.W.
Suite 3 10
Washington, D.C. 20005
(202) 842-3 193

Respectfully submitted,



Rich&d D. Mathias
ZUCKERT, SCOUTT &
RASENBERGER, L.L.P.
888 Seventeenth Street, N.W.
Suite 600
Washington, D.C. 20006-3309
(202) 298-8660

Attorneys for ALITALIA-LINEE AEREE
ITALIANE-S.p.A.



Paul V. Mifsud
Vice President, Government &
Legal Affairs – USA
KLM ROYAL DUTCH AIRLINES
2501 M Street, N.W.
Washington, D.C. 20037
(202) 626-6717

Dated: July 15, 1999

NORTHWEST AIRLINES, INC.

DOCKET OST-99-5674

BATES NUMBERS	DATE	RESPONDS TO	PREPARED BY
00001 – 00008	5/14/99	A, B	M. Foret, T. Griffin
00009 – 00018	7/17/97	A	B. Soukup
00019 – 00021	7/16/97	A	B. Soukup
00022 – 00025	7/21/97	A	B. Soukup
00026 – 00033	7/28/97	A	B. Soukup, J. Wilson
00034 – 00036	10/1/98	A	D. Mishkin
00037 – 00048	10/20/97	A	International Planning
00049 – 00050	10/22/97	A	B. Soukup
00051-00065	6/2/97	A	International Planning
00066-00070	5/30/97	A	International Planning
00071-00075	10/6/97	B	L. Aandahl
00076-00079	10/9/97	B	B. Soukup
00080-00085	N/A	A	International Planning
00086-00088	N/A	A	International Planning
00089-00102	12/2/98	B	International Planning
00103-00107	12/24/97	A	H. Passe
00108-00117	10/31/97	A	International Planning
00118-00119	8/25/97	A	H. Passe
00120-00149	2/26/98	A	D. Spellman
00150-00200	11/19/98	A	M.R. Garfinkle, W.S. Swelbar, GKMG Consulting Services, Inc.
00201-00208	7/2/97	A	International Planning
00209-00211	9/3/97	A	H. Passe
00212-00217	7/8/97	A	International Planning
00218-00227	6/12/97	A	International Planning
00228-00239	6/16/97	A	International Planning
00240-00267	2/98	A	Marketing
00268-00286	4/2/99	A, B	Marketing
00287-00289	N/A	B	
00290-00291	12/5/97	B	D. Birdsall
00292-00298	2/12/99	A	D. Skwarek
00299-00301	N/A	A	D. Birdsall
00302-00328	9/1/98	A	R. Lenza
00329-00330	N/A	A	H. Passe
00331-00346	12/2/98	B	International Planning
00348	1/13/99	A	L. Aandahl

BATES NUMBERS	DATE	RESPONDS TO	PREPARED BY
00349	1/7/99	A	T. Griffin
00350- 00359	N/A	B	Marketing
00360- 00361	3/31/98	B	L. Aandahl, J. Kopchik
00362- 00369	3/17/98	B	International Planning
00370	2/4/98	B	H. Passe
00371 – 00372	N/A	A	H. Passe
00373- 00383	10/13/98	A	Boston Consulting Group
00384- 00398	12/8/98	A	Boston Consulting Group
00399- 00404	2/16/98	A	Boston Consulting Group
00405- 00415	3/99	A	Boston Consulting Group
00416- 0043 1	2/9/98	A	E. Smick, SH&E
00432- 00441	1/9/98	A, I3	E. Smick, SH&E
00442	1/4/99	A	Marketing
00443 - 00447	4/21/99	A	D. Leo
00448- 00454	8/28/98	A	Marketing
00455- 00458	9/3/98	A	Marketing
00459- 00463	N/A	A	International Revenue Management
00464- 00465	7/1/97	A	J. Jennings
00466- 00469	12/1/98	A	Marketing
00470	3/12/99	A	B. Soukup
00471 – 00473	10/13/97	A	International Revenue Management
00474- 00478	1/4/99	A	Marketing
00479- 00482	1/18/99	A	Marketing
00483 - 00486	4/8/98	A	B. Soukup, D. Spellman

KLM

DOCKET OST-99-5674

BATES NUMBERS	DATE	RESPONDS TO	PREPARED BY
00011 – 00063	12/97	A, I3	P. Bootsma, Network Planner
00064- 00071	1/20/98	A, I3	P. Bootsma, Network Planner
00072- 00084	N/A	A, B	M. Pantlin, Director, Corporate Strategy & Planning
00085-00103	N/A	A, B	M. Pantlin, Director, Corporate Strategy & Planning
00104-00124	3/27/98	A, I3	P. Bootsma, Network Planner
00159-00160	10/17/97	A, B	M. van der Zee
00161-00176	N/A	A	M. Pantlin, Director, Corporate Strategy & Planning
00177-00187	N/A	A	M. Pantlin, Director, Corporate Strategy & Planning
00188-00207	7/17/98	A	M. Pantlin, Director, Corporate Strategy & Planning
00208- 00248	11/9/98	A	J. Gemke
00249- 00266	N/A	B	D. Kalf, Executive Vice President, Corporate Strategy

ALITALIA

DOCKET OST-99-5674

BATES NUMBERS	DATE	RESPONDS TO	PREPARED BY
00001 – 00022	3/27/98	A, I3	J. La Costa, Vice President, Network Planning
00023- 00048	3/31/99	A, B	I. Paris, Business Development Analyst
00049- 00068	2/3/99	A, I3	I. Paris, Business Development Analyst
00069- 00075	2/19/98	B	J. La Costa, Vice President, Network Planning

CERTIFICATE OF SERVICE

I certify that on this 15th day of July 1999, a copy of the foregoing Joint Response of Alitalia-Linee Aeree Italiane-S.p.A., KLM Royal Dutch Airlines, and Northwest Airlines, Inc. was served by first class mail, postage prepaid, upon the following:

James W. Tello
Filler, Weller & Tello. P.C.
117 N. Henry Street
Alexandria, VA 223 14-0784
(Counsel for Air Transport Int'l)

Carl B. Nelson, Jr.
Associate General Counsel
American Airlines, Inc.
1101 17th Street, N.W.
Suite 600
Washington, D.C. 20036

William G. Doherty
7337 W. Washington Street
Indianapolis, IN 4625 1-0609
(Counsel for American Trans Air)

John L. Richardson
Crispin & Brenner, P.L.L.C.
1100 New York Avenue, N.W.
Suite 850
Washington, D.C. 20005
(Counsel for Amerijet Int'l)

Allan W. Markam
2733 36th Street, N.W.
Washington, D.C. 20007-1422
(Counsel for Arrow Air)

William C. Evans
Vemer, Liipfert, Bernhard, McPherson
and Hand, Chartered
901 1 5th Street, N.W.
Suite 700
Washington, D.C. 20005
(Counsel for Atlas Air)

William H. Callaway, Jr.
Zuckert, Scoutt & Rasenberger, LLP
888 17th Street, N.W.
Suite 600
Washington, DC. 20006
(Counsel for Challenge Air Cargo)

R. Bruce Keiner
Lorraine B. Halloway
Crowell & Moring, LLP
100 1 Pennsylvania Avenue, N. W.
Washington, D.C. 20004-2595
(Counsel for Continental and Emery)

Hershel Kamen
Staff Vice President,
International & Regulatory Affairs
Continental Airlines, Inc.
P.O. Box 4607 - HQSGV
Houston, TX 772 1 O-4607

Robert E. Cohn
Shaw, Pittman, Potts, & Trowbridge
2300 N Street, N.W.
Washington, D.C. 20037
(Counsel for Delta Air Lines)

R. Tenney Johnson
2121 K Street, N.W.
Suite 800
Washington, D.C. 20037
(Counsel for DHL)

Tom Lydon
Director of Government Affairs
Evergreen Int'l Aviation, Inc.
1629 K Street, N.W.
Suite 301
Washington, D.C. 20006

Nathaniel P. Breed, Jr.
Shaw, Pittman, Potts & Trowbridge
2300 N Street, N.W.
Washington, D.C. 20037
(Counsel for Federal Express)

Marshal 1 Sinick
Squire, Sanders & Dempsey
120 1 Pennsylvania Avenue, N. W.
Suite 500
Washington, D.C. 20004
(Counsel for Florida West Int'l)

Moffett B. Roller
Roller & Bauer
1350 Eye Street, N.W.
Suite 200
Washington, D.C. 20005
(Counsel for Gemini Air Cargo)

Robert 'P. Silverberg
Bagileo, Silverberg, & Goldman
110 1 30th Street, N. W.
Suite 120
Washington, D.C. 20036
(Kitty Hawk International)

Robert Beckman
Bode & Beckman
1150 Connecticut Avenue, N.W.
Ninth Floor
Washington, D.C. 20036
(Laker Airways)

David Kirstein
Baker & Hostetler, LLP
1050 Connecticut Avenue, N.W.
Suite 1100
Washington, D.C. 20036
(Counsel for North American Airlines)

Theodore I. Seamon
Hewes., Gelband, Lambert
& Dann, P.C.
1000 Potomac Street, N. W.
Suite 300
Washington, D.C. 20007
(Counsel for Northern Air Cargo)

Jeffrey A. Manley
Kirkland & Ellis
655 1 5th Street, N.W.
Washington, D.C. 20005
(Counsel for United and Polar)

Pierre Murphy
One Westin Center
2445 M Street, N.W.
Suite 260
Washington, D.C. 20037
(Counsel for Fine Air & SAT)

Dennis N. Barnes
Morgan, Lewis & Bockius
1800 M Street, N.W.
Suite 600N
Washington, D.C. 20036
(Counsel for Sun Country Airlines)

Stephen Gelband
Hewes, Gelband, Lambert
And Dann, P.C.
1000 Potomac Street, N. W.
Suite 300
Washington, DC. 20007
(Counsel for Tower Air)

Richard J. Fahy, Jr.
Consulting Attorney
Trans World Airways
900 19th Street, N.W.
Suite 350
Washington, D.C. 20006

David L. Vaughan
Kelley, Drye & Warren
1200 1 9th Street, N. W.
Suite 500
Washington, D.C. 20036
(Counsel for UPS)

Lawrence M. Nagin
Executive Vice President, Corporate
Affairs, and General Counsel
US Airways, Inc.
Crystal Park Four
2345 Crystal Drive
Arlington, VA 22227

Malcolm L. Bengé
Zuckert, Scoult & Rasenberger, LLP
888 17th Street, N.W.
Suite 600
Washington, D.C. 20006
(Counsel for World Airways)

Joseph. Guerrieri, Jr.
Guerrieri, Edmond, & Clayman, P.C.
133 1 F Street, N.W.
Washington, D.C. 20004
(Counsel for International Association
of Machinists)

U.S. Department of Defense
U.S. Transcom TCJ5
Attn: Air Mobility Analysis
508 Scott Drive
Scott AFB, IL 62225-5357

Roger Fones
Chief, Transportation, Energy &
Agricultural Section
Antitrust Division
U.S. Department of Justice
325 Seventh Street, N.W.
Suite 500
Washington, D.C. 20530

David Marchick
Deputy Assistant Secretary for
Transportation Affairs
U.S. Department of State
2201 C Street, N.W.
Room 5830
Washington, D.C. 20520

Paul M. Rudin
Senior Vice President
Legal & Industry Affairs
American Society of Travel Agents, Inc.
1101 King Street
Alexandria, VA 223 14



Richard D. Mathias