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January 8, 2002

The Honorable Norman Y. Mineta
Secretary
Department of Transportation
400 Seventh Street, S.W.
Room 10200
Washington, D.C. 20590

OST-2001-11029-120

Re: **American Airlines/British Airways Antitrust Immunized Alliance**

Dear Secretary Mineta:

On behalf of Troon Golf Corporation, I would like to provide my strong opposition to the proposed American Airlines/British Airways antitrust immunized alliance and codeshare application. The alliance between the largest airline in the world and the largest airline in the U.K. would have significant competitive effects and would harm air travelers and shippers through the alliance's ability to dominate the U.S.-U.K. (specifically the U.S.-London Heathrow) market.

American Airlines and British Airways are already the two largest airlines serving the U.S.-London market, and combined, the airlines hold over 60% of the capacity between the U.S. and London Heathrow. If given antitrust immunity, the airlines will effectively eliminate a competitor on these key international routes and it is a certainty that there will be a reduction in fare and service options. What's more, given the severe capacity constraints at London Heathrow airport, it is not expected that any other carrier will be able to provide new service. This will place corporations like mine at the mercy of American Airlines and British Airways.

Through their antitrust immunized alliance, American Airlines and British Airways will be able to use their dominance to force market share shift. As London Heathrow is such an important international destination, and other carriers will not have access to this airport, corporations will have no choice but deal with the alliance. Additionally, by leveraging their dominance of London Heathrow, American Airlines and British Airways could force performance on non-alliance routes in order for corporations to obtain the benefits of London Heathrow.

While I understand your desire to amend the aviation agreement between the U.S. and U.K., it is critical that competition and consumers not be sacrificed for this goal. Troon Golf Corporation urges that you oppose the American Airlines/British Airways alliance.

Sincerely,

A handwritten signature in black ink, appearing to read "Steven A. Velastegui". The signature is stylized and written in a cursive-like font.

Steven A. Velastegui
Corporate Travel Manager