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February 4, 2002

OST-2001-11029-122

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

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

Dear Secretary Mineta:

On behalf of Flexsys America L.P., I would like to voice our opposition to the proposed American Airlines/British Airways antitrust immunized alliance and codeshare application.

We believe that 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. 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. If given antitrust immunity, it is a certainty that there will be a reduction in fare and service options at Heathrow and this might spill over into related markets.

Flexsys is a manufacturer and seller on a global basis and generally we are understanding of and sympathetic to the pressures facing business today. However, antitrust immunity is too radical a remedy. Such action would simply skew market forces too dramatically. This would place businesses like Flexsys at the mercy of American Airlines and British Airways.

Thank you for your consideration of our views.

Sincerely,

William D. Woodyard
Vice President, Americas

WDW:seb