

**Before the
U.S. DEPARTMENT OF TRANSPORTATION
OFFICE OF THE SECRETARY
Washington, D.C. 20530**

In the Matter of)	
)	
Information on Claims Raised About State)	Docket No. DOT-OST-2015-0082-0049
Owned Airlines in Qatar and the UAE)	
)	
)	

**COMMENTS OF
BUSINESS TRAVEL COALITION AND OPENSKIES.TRAVEL**

August 3, 2015

Communications with respect to this document should be sent to:

Kevin P. Mitchell
Founder
Business Travel Coalition, OpenSkies.travel
214 Grouse Lane, Suite 100
Radnor, PA 19087
610-999-9247
mitchell@businessstravelcoalition.com
<http://btc.travel>

I. BACKGROUND

In the dispute over U.S. Open Skies policy and Gulf carrier access to U.S. markets, all manner of studies, counter studies and reports have been submitted by the commercial participants in this debate to the Administration's three public dockets. However, the purpose of this filing is to ensure that the Administration understands the views of the managed-travel stakeholder in this debate – the corporate, university and government travel buyer and the travel management companies that support them. OpenSkies.travel, a coalition of travel managers, travel management companies, travel industry suppliers, consumer groups and travel organizations from around the world, set out to provide that understanding.

A survey of 420 U.S. travel professionals found that 97.6 percent of respondents, who have traveled internationally or outside of the United States by airplane, agreed that they support U.S. government Open Skies policy objectives and 90.2 percent agreed that the government should not give into U.S. airlines' demands that foreign airline expansion into the U.S. be stopped.

The survey results should help illuminate the issue for the U.S. Departments of Transportation, State and Commerce. Travel industry professionals realize the significant benefits to them and the travelers and organizations that they provide travel services to that are generated from U.S. Open Skies policy. What's more, these industry professionals see straight through the U.S. airlines' allegations of unfair Gulf carrier competition as nothing more than blatant commercial protectionism. Recent business-traveler comments in the *Wall Street Journal* only reinforce this widespread understanding (<http://btcnews.co/1Duy9eI>).

II. SUMMARY RESULTS

- A super majority of survey participants, or 86.2 percent, agrees that U.S. airlines need more competition from foreign airlines. (strongly agree 60.05%; somewhat agree 26.19%)

- A minority, or 19.1 percent, agrees major U.S. airlines are focused on the best interests of consumers. (strongly agree 2.38%; somewhat agree 16.67%)

- A majority, or 76.2 percent, agrees Gulf airlines are focused on the best interests of consumers. (strongly agree 30.95%; somewhat agree 45.24%)

- 100 percent agree that the Gulf airlines have increased travel opportunities from the United States to key markets in the Middle East, India and Southeast Asia. (strongly agree 76.19%; somewhat agree 23.81%)

See Addendum 1 for complete survey results.

III. ANALYSIS

Now that the U.S. Big Three airlines - Delta Air Lines, American Airlines, United Airlines - have secured antitrust immunity for their global alliances and joint ventures, and have engineered U.S. domestic consolidation, they want to pull up the "Drawbridge" and lock down "Fortress America" by seeking to freeze Gulf carrier (Etihad Airways, Emirates and Qatar Airways) and other foreign carrier expansion into the U.S.

Allowing the Big Three to hijack the public policy making process and to deny consumers access to competitive options and alternatives would completely undermine and reverse the goals and principles of U.S. Open Skies policy. The interests being served are the Big Three's. Only a minority of travel professionals (19.1 percent) believes that U.S. airlines are focused on their best customers' interests compared with a large majority (76.1 percent) for the Gulf carriers. Importantly, 100 percent of participants agree that the Gulf carriers have increased travel opportunities from the U.S. to key markets in the Middle East, India and Southeast Asia.

OpenSkies.travel and its members urge the Administration to act with a sense of urgency to reject the protectionist demands of the Big Three and thereby to remove the ongoing financial and economic harm to U.S. organizational buyers of commercial air transportation services and other U.S. airlines as well as our Open Skies partners who took us at our word when we convinced them to enter into these air service liberalization agreements.

VI. METHODOLOGY

This survey was conducted online by Business Travel Coalition June 1, 2015 to July 15, 2015 and is based on responses from 420 frontline travel industry participants who are representative members of the Business Travel Coalition's worldwide industry panel. The sample was screened by respondents who answered "Yes" to the question, "Have you ever traveled internationally or outside of the United States by airplane?" The average number of trips taken by airline in the past year for survey respondents was 23.9.

Respectfully Submitted,



Kevin P. Mitchell
Chairman and Founder
Business Travel Coalition

Addendum

Travel Industry Survey Questions	Results	
The U.S. has Open Skies agreements with 115 countries to lower airfares and provide more convenient travel options. Do you support this U.S. government policy?	80.95% 16.67% 0.00% 2.38%	Strongly support Somewhat support Somewhat non supportive Strongly non supportive
How strongly do you agree or disagree with this statement: U.S. airlines need more competition from foreign airlines.	69.05% 26.19% 4.76% 0.00%	Strongly agree Somewhat agree Somewhat disagree Strongly disagree
How strongly do you agree or disagree with this statement: The government should not give into U.S. airlines' demands that foreign airline expansion into the U.S. be stopped.	73.17% 17.07% 0.00% 9.76%	Strongly agree Somewhat agree Somewhat disagree Strongly disagree
How strongly do you agree or disagree with this statement: Major U.S. airlines are focused on the best interests of consumers, i.e. providing good service at reasonable prices?	2.38% 16.67% 28.57% 52.38%	Strongly agree Somewhat agree Somewhat disagree Strongly disagree
How strongly do you agree or disagree with this statement: Gulf airlines are focused on the best interests of consumers, i.e. providing good service at reasonable prices.	30.95% 45.24% 19.05% 4.76%	Strongly agree Somewhat agree Somewhat disagree Strongly disagree
Do you agree that the Gulf airlines have increased travel opportunities from the United States to key markets in the Middle East and in India and Southeast Asia?	76.19% 23.81% 0.00% 0.00%	Strongly agree Somewhat agree Somewhat disagree Strongly disagree