BEFORE THE
UNITED STATES DEPARTMENT OF TRANSPORTATION
WASHINGTON, D.C.

COMPLAINT OF THE AMERICAN SOCIETY OF TRAVEL ADVISORS, INC. AGAINST AMERICAN AIRLINES ALLEGING UNFAIR PRACTICES AND REQUEST FOR RELIEF PURSUANT TO 49 U.S.C. § 41712	Docket No. DOT-OST-2023-0147

REPLY OF THE AMERICAN SOCIETY OF TRAVEL ADVISORS, INC. TO THE ANSWER OF AMERICAN AIRLINES, INC.

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**REPLY OF THE AMERICAN SOCIETY OF TRAVEL ADVISORS, INC.
TO THE ANSWER OF AMERICAN AIRLINES, INC.**

Complainant American Society of Travel Advisors, Inc. (ASTA), by its undersigned counsel, files with the Department of Transportation (the “Department”) its reply to the Answer of American Airlines, Inc. (“American” or “AA”) to ASTA’s Complaint alleging unfair practices and requesting relief pursuant to 49 U.S.C. § 41712.

I. INTRODUCTION

AA’s answer to ASTA’s complaint consists largely of a recitation of unsubstantiated assertions, strawman arguments and cherry-picked facts intended to create the impression that the domestic airline industry is “intensely competitive” (Ans. at 36) and that its forced implementation of NDC on an unready industry earlier this year was a market-driven response to consumer demand.

However, the weight of the evidence, and American’s own actions, compel a contrary conclusion. Indeed, the arguments presented in the answer are little more than a diversion, a thinly veiled attempt to draw the Department’s attention away from the inescapable conclusion that AA’s actions do indeed constitute an unfair practice under 49 U.S.C. § 41712 that warrants investigation and the subsequent commencement of an enforcement action.

Conspicuously absent from American’s answer is any meaningful effort to substantively refute the substantial evidence presented that powerfully supports ASTA’s position with respect to the central facts of this dispute, namely, that AA: i) holds the dominant market position in an oligopolistic industry; and ii) abused the power associated with that position to the grave detriment of both consumers as well as their air ticket distribution competitors. Significantly, AA does not challenge ASTA's assertions regarding its overall market share and its dominance of numerous key hub cities and routes, and admits outright that it removed substantial fare inventory from the traditional EDIFACT channel (as detailed below). Moreover, we noted that on no less than 29 occasions, AA responds to an ASTA assertion supported by documentation by dismissively stating that the document in question "speaks for itself and requires no response."[1] Accordingly, ASTA urges the Department to not be distracted by American's contentions which are unpersuasive and, frankly, immaterial to the essential facts of this dispute.

ASTA respectfully submits that no further showing is required on its part to warrant the immediate commencement by the Department of an enforcement proceeding against American, but will utilize the balance of this reply to either amplify its position with respect to certain points or to rebut erroneous or misleading assertions raised in the answer.

II. AA ADMITS IT REMOVED 40% OF ITS FARES FROM EDIFACT AND CANNOT PLAUSIBLY CLAIM THAT CONSUMERS HAVE NOT BEEN HARMED AS A RESULT

AA alleges that ASTA produced "no evidence" in its complaint that NDC has "led to higher prices or fewer options on any route… or otherwise harmed consumers" (Ans. at 2). This assertion is demonstrably false on all counts.

[1] Specifically, American provides this response, in whole or in part, to the allegations set forth in paragraphs 20, 22, 23, 26, 29, 33, 35, 36, 37, 38, 39, 40, 41, 46, 47, 48, 54, 55, 58, 61, 62, 63, 84, 92, 93, 95, 100, 104 and 106 of the complaint.

First, American expressly admits throughout its answer that in furtherance of its NDC initiative it removed transactable fares from the EDIFACT channel. To cite just two examples, on page 5 of the answer, AA states, “ASTA’s complaint is limited to the fact that American does not allow all of its fares to be transactable using EDIFACT.” (Ans. at 5). Similarly, AA states on page 16 that “American announced in December 2022 that some of its products would only be transactable through NDC technologies beginning in April 2023. All fares remain viewable and available for comparison in EDIFACT or NDC, but *transactability requires adoption of NDC technologies*.” (Ans. at 16, emphasis added).

Second, American’s removal of such a substantial portion of its fare inventory from EDIFACT greatly impedes the ability of travel agencies and TMCs to efficiently comparison shop among the various air carriers serving the same routes. As noted in the complaint, while historically all fare content was aggregated, accessible and bookable via a single channel, EDIFACT, that is no longer the case. And ASTA’s members are not the only ones concerned about that development. To quote former Sabre executive Chris Kroeger in a recent piece that appeared in *The Company Dime*, “[d]isaggregation is not consumer-friendly, nor is it efficient.”[2]

Notwithstanding the foregoing, AA boldly proclaims that “[t]here simply is no colorable, consumer-centric basis for ASTA’s complaints” (Ans. at 21). But it is axiomatic that merely stating a proposition does not make it so. As detailed in ASTA’s complaint, a

[2] Kroger, Chris. *Op Ed: Chris Kroeger On The NDC-TV Analogy*. The Company Dime (November 30, 2023), https://www.thecompanydime.com/op-ed-chris-kroeger-ndc-cable-tv-analogy/?utm_source=The+Company+Dime+Alerts&utm_campaign=24d207a4eb-EMAIL_CAMPAIGN_2022_01_03_07_59_COPY_01&utm_medium=email&utm_term=0_0152d9cf01-24d207a4eb-242233017&mc_cid=24d207a4eb.

respected third-party fare data aggregator compared EDIFACT and NDC-channel fares for 142 different domestic city pairs flown by American. For each route, the aggregator also compared fares across different cabin classes (main cabin, main cabin extra, business and first class) where fares in both channels were published. Across the board, and without exception, the average NDC channel fare was lower, in some cases, by more than 50 percent. And, for the practical and legal reasons detailed at length in the complaint, booking outside of the EDIFACT channel is not a feasible option for advisor-assisted consumers.

In an apparent effort to lend support for its action, AA asserts that United Airlines implemented a "similar program" on September 5, 2023 (Ans. at 16). But this is an apples and oranges comparison. United's action involved the removal of only its Basic Economy fares from EDIFACT. That ticket class is ineligible for refunds and does not include seat selection. In addition, on most United flights, Basic Economy passengers cannot bring a carry-on bag on board. Due to these limitations, "Basic Economy accounts for less than one-tenth of 1 percent of United's corporate travel sales."[3] Hence the impact on both TMCs and their clients is negligible. Moreover, in its July announcement of the impending change, United stressed that it had "no plans to remove other content from the legacy GDS systems."[4]

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[3] Boehmer, Jay. *United Puts Basic Economy on EDIFACT Chopping Block, Expands Continuous Pricing.* The Beat (July 26, 2023), https://www.thebeat.travel/News/United-Puts-Basic-Economy-On-EDIFACT-Chopping-Block.

[4] Wood, Donald. *United Airlines to Remove Basic Economy Fares from GDS Channels*. Travel Pulse (July 27, 2023), https://www.travelpulse.com/news/agents/united-airlines-to-remove-basic-economy-fares-from-gds-channels.

Insofar as consumer harm has been amply demonstrated, the inquiry shifts to whether there is any countervailing consumer benefit associated with removal of 40 percent of American's fare inventory from the traditional channel. On this point, there is no response from AA. Indeed, the best that American can muster is to speak in generalities, *e.g*., greater "consumer choice," but it is plainly unable to point to even one concrete benefit of its actions which accrues to consumers who choose to book their air travel with the assistance of a trusted advisor or TMC.

In short, American concedes in its answer, as it must, that it removed substantial fare inventory from the EDIFACT channel and third-party fare aggregation data establishes that the fares remaining in EDIFACT, across all cabin classes, were markedly higher than those bookable via aa.com or other NDC-enabled channel. And since AA fails to assert that these adverse consequences are outweighed by benefits to either consumers or competition, commencement of an investigation, followed by enforcement proceedings by the Department pursuant to its statutory authority, is plainly warranted.

III. AA FALSELY CLAIMS NDC IS A RESPONSE TO CONSUMER DEMAND AND THAT CONSUMERS ARE SATISFIED

Throughout its answer, AA claims that the action it took was in response to consumer demand and that NDC implementation has resulted in greater consumer satisfaction. To cite two examples, American avers that "[t]he evidence shows that customers are (understandably) more satisfied…" (Ans. at 2) and characterizes NDC implementation as "a competitive and positively-received response to consumer demands." (Ans. at 9). Yet conspicuously absent from the discussion under this point heading, or the answer as a whole, is anything substantiating the claim that *any* consumers, much less those who prefer to book with an advisor, or business entities that require a TMC to fulfill their duty of care obligations, demanded adoption of different technology. Likewise, any verifiable evidence of consumer satisfaction is similarly lacking.

Indeed, whatever benefits may accrue to a subset of consumers through industry-wide adoption of a fully baked NDC, whenever that may take place, one certainly cannot fairly characterize NDC as a response to consumer demand. Moreover, American cannot claim that NDC, in its current state of readiness, confers any benefit whatsoever on the nearly half of all airline passengers who book through an intermediary agency or TMC. American further asserts that "[t]he disparity in the quality of information between AA.com and the quality of information available through EDIFACT-based technology does not serve customers" (Ans. at 13). Even assuming that were true, however, it ignores the fact that forcing consumers to choose between booking with the advisor of their choice or getting the best fare works a far greater disservice to them.

American would have the Department believe that "NDC allows consumers to choose what they want, or what they do not want, at market-driven, rather than technology-driven, prices" (Ans. at 13). But if what the consumer wants is the best price <u>and</u> the guidance, service and convenience associated with working with a trusted advisor or TMC, as fully 48 percent of all airline passengers do, no, they simply can't have that. The result is a far cry from the "delightful shopping experience" American describes in its answer (Ans. at 13).

We note too how arrogantly AA dismisses both the desires of consumers who find value in booking with the assistance of an advisor and the critical role agencies play in the air ticket distribution ecosystem. Its disdainful attitude towards these consumers – who again comprise nearly half of all domestic airline passengers – and the advisors who serve them, is illustrated by the following passage from AA's answer:

> NDC works in part because it connects the supplier (the airline), and the consumer (the traveler). ASTA ignores the importance of that direct relationship between the customer and the airline. *When a customer buys an American ticket, they become American's customer, and ASTA's members are merely the agent that facilitated that transaction* (Ans. at 21, emphasis added).

The implication is clear: rather than view consumers as shared clients, AA views the consumer as its sole property, wholly discounting the relationship between travelers and advisors and simultaneously marginalizing the indispensable part travel agencies play in bringing these consumers to American from the outset and supporting them thereafter.

IV. AA OVERSTATES THE CURRENT FUNCTIONALITY OF ITS NDC PRODUCT

American's selective references to the positions and the efforts of other important stakeholders paint a misleadingly optimistic picture of the current state of its NDC readiness and its acceptance in the industry. One example is AA's citation of positive quotations taken from a post published on the website of Travelport, one of the three major Global Distribution Systems (GDSs) used in the United States (Ans. at 3 and 16). But views expressed there are far from an unequivocal endorsement and indeed *support* ASTA's position on several key points. For example, Travelport's view on technology largely echoes our own: "More content is a good thing, but only if you've got the right technology to manage it."[5] Similarly, on the ability to service bookings: "Being able to book offers is only the first phase of NDC. Content isn't truly retail-ready if you can't service that content with full end-to-end capabilities."[6] And on the critical need for further NDC development: "we continue to work with suppliers worldwide to close the gaps that exist in their NDC programs."[7]

The Department will note that American's answer contains no fewer than eleven references to Spotnana, a third-party service provider,[8] to bolster its claim that AA's NDC implementation has been both successful and well received. The answer also includes multiple positive quotes from one of Spotnana's officers, Johnny Thorsen, to lend further support to American's position. (Ans. at 4, 20, 21, 22).

However, these endorsements are both misleading and, frankly, self-serving, as Spotnana's platform is needed in order to aggregate fare data and integrate NDC-only content. That successful utilization of NDC requires use of another company's platform actually proves ASTA's point that notwithstanding its protestations to the contrary, AA's NDC "solution" was not – and still is not – sufficiently developed to permit responsible implementation on American's dictated timeframe. And significantly, due to the high cost associated with it, most agencies and TMCs do not utilize Spotnana and as such it is not a viable workaround.

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[5] *Busting the Myths on NDC*, Travelport (July 13, 2023), https://www.travelport.com/our-views/busting-the-myths-on-ndc.
[6] *Id*.
[7] *Id*.
[8] For the record, Spotnana is a third-party cloud-based technology platform and not an agency as American incorrectly states in its answer (Ans. at 16).

In a similar vein, AA cites investment in NDC by some online travel agencies (OTAs) such as Expedia, Priceline and Hopper and implies that agencies and TMCs that have not made similar investments are either not "forward-looking" or are simply unwilling to do so (Ans. at 16). American adds that "over 50% of its total indirect volume [agency sales, which includes OTAs], come from NDC-enabled channels" (Ans. at 17).

These statements not only unfairly attempt to shift the blame for the situation onto agencies and TMCs but also paint a grossly distorted picture of the true situation, for two reasons. First, the OTAs lauded for their actions are multi-billion dollar entities with the resources to make the very substantial financial commitments necessary to bring a workable NDC-based platform to their customers. Small- and even most medium-sized agencies and TMCs simply do not have the wherewithal to make investments on the scale required to achieve a proprietary solution. For the same reason, citing the investments made in NDC by the three GDSs – Sabre, Amadeus and Travelport – also multi-billion dollar companies, is similarly an apples-to-oranges comparison.

Second, the clientele of the large OTAs – overwhelmingly leisure travelers – is far different from that of a TMC whose clients are businesses with managed travel programs that owe a duty of care to their traveling employees. In contrast, no heightened duty of care is owed to a leisure traveler in connection with the booking of one's own itinerary via an OTA.

American's listing of current functionality with respect to its own API (Ans. at 18-20) is also misleadingly optimistic, as it pertains to new bookings and, contrary to AA's assertion, NDC in its current form does not improve the ability to service and change existing bookings. Processing refunds remains an unknown. Also not considered is the ease with which changes can be made, if at all, in the absence of a third-party platform solution such as Spotnana. The following is a non-exhaustive list of specific servicing-related functionalities that ASTA agency and TMC members continue to report present intractable challenges given the current state of AA's NDC readiness:

1. Inability to hold a booking
2. Inability to make changes to an existing itinerary
3. Rail content is not supported[9]
4. Guest bookings are not allowed
5. Government GSA rates / hotel per diem rates not allowed
6. Inability to book air, car and hotel at the same time during the booking flow[10]
7. Inability to return options based on fare (only by schedule)
8. Inability to book some multi-city itineraries
9. Inability to support rules or custom fields[11]
10. No virtual payment capability

None of this should come as a surprise to American. Indeed, as stated in the complaint, the ability to service bookings with third-party tools, such as SAP Concur (used by over 90 percent of TMCs) is seriously compromised in an NDC environment. Moreover, the fact that these deficiencies remain reveals that very little progress has been made to close the functionality gap.

It is also significant to note that American's claimed NDC shopping functionality pertains only to shopping for AA fares. As detailed in the complaint and noted elsewhere in this reply, it is the inability to conduct cost comparisons among all airlines operating a

[9] Many TMC clients, particularly those based in the Northeast, rely on Amtrak service in addition to domestic air service.
[10] Rental car and hotel reservations can only be added at the end of the booking.
[11] This function is commonly used by TMCs to support detailed client reporting such as business units, cost centers, etc.

given route in a transparent and efficient manner that is most detrimental to consumers, and it continues to cost passengers billions in the form of higher airfares. Unfortunately, this will continue to be the case unless and until the Department intervenes.

V. AA'S FARE DATA CREATES A FALSE IMPRESSION OF THE STATE OF COMPETITION IN THE AIRLINE INDUSTRY

In an effort to bolster the dubious claim that the domestic airline industry is "intensely competitive" (Ans. at 36), American cites Consumer Price Index (CPI) data indicating that airfares dropped (on an inflation adjusted basis) by over 20 percent between October 2019 and October 2023 (Ans. at 38).

AA's reliance on this data is unwarranted for two reasons. First, the data pertains only to base fares, and does not account for the significant additional revenue airlines generate through the sale of ancillary products and services, such as advance seat selection, baggage fees, in-flight wi-fi access, and the like. Sales of ancillaries accounted for a staggering $69 billion of additional revenue for the airlines in 2022, and that number is only expected to increase in the future.[12] Indeed, the facilitated ability to upsell consumers on extra-cost ancillaries is one of the prime objectives motivating the adoption of NDC.

Second, the period over which the 20 percent drop in base fares occurred coincides with the COVID-19 pandemic during which passenger demand for air travel dropped to unprecedented levels. Indeed, passenger traffic in April 2020 was a staggering

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[12] *Airline Ancillary Revenue Hit $69B in 2022, Beating 2019 Levels*. Phocuswire.com. https://www.phocuswire.com/cartrawler-ideaworks-ancillary-revenue-2022 (accessed November 27, 2023).

96 percent lower as compared to the same time one year earlier, and demand remained at least 60 percent below corresponding 2019 levels for the remainder of the year.[13] Plainly, the four-year the period AA cites in making its point is, to put it mildly, not representative of the forty-five years since the airlines were deregulated.

Removing the pandemic years from the analysis creates a starkly different impression of the direction in which airfare prices are headed. Between 2022 and 2023, the CPI for airline tickets increased by 25 percent, outpacing the CPI overall by over 200 percent. In fact, this increase was the largest reported since the Federal Reserve Bank of St. Louis began tracking the index in 1989.[14]

Even assuming that AA had furnished fare data that was based on “all in” pricing, including the highly profitable ancillaries, and measured over a period not impacted by a global pandemic, as American aptly states albeit in a somewhat different context, “prices are just one measure of competition” (Ans. at 38). On that score, ASTA reiterates its view that the market share of the largest airlines is a more meaningful measure of competition in the industry.

In 1977, the year prior to airline deregulation, the combined market share of the four largest domestic carriers comprised barely half of the total market, specifically, 51.5 percent, with the balance divided among numerous national and regional carriers.[15] Just

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[13] *COVID-19 Pandemic: Observations on the Ongoing Recovery of the Aviation Industry.* U.S. Government Accountability Office. GAO-22-104429 (Oct 21, 2021).
[14] *Airline ticket prices are up 25%, outpacing inflation.* CNBC.com. https://www.cnbc.com/select/airline-ticket-prices-are-up-25-percent-why-and-how-to-save/ (accessed December 15, 2023).
[15] Rodrigue, Jean-Paul, et al., *Market Share of the top American Airlines, 1977-2022* https://transportgeography.org/contents/chapter5/air-transport/airline-market-share-united-states/ Hofstra University, Department of Global Studies & Geography (2020).

fifteen years later, in 1992, the market share of the four largest carriers had swelled to 67.3 percent.[16] Worse, statistics indicate that this trend of greater concentration of market share among a smaller number of airlines will only continue. While the four dominant carriers (American, Delta, United and Southwest) are all expected to generate pretax profits for 2023 of between $1 billion and $5 billion, more than half of those airlines in the next tier (measured by operating revenue) are expected to post losses for the year, including Spirit, Hawaiian, JetBlue and Frontier.[17] As this state of affairs is not sustainable in the long term, it is reasonable to expect some of these airlines to be either acquired by other airlines or cease operating altogether, with the result in either case being still greater concentration of market share among the dominant carriers.

VI. AA MISSTATES OR MISCHARACTERIZES ASTA'S POSITION IN NUMEROUS KEY RESPECTS

Finally, American's answer is replete with characterizations of ASTA's position on NDC which bear no relation to its actual stance as expressed in either the complaint or its public statements on the subject. To begin, American describes the complaint as a compilation of "unsupported allegations" (Ans. at 1), this despite the fact that AA concedes ASTA's central claim that it removed 40 percent of its fare inventory from the EDIFACT channel and provided third party fare data substantiating the serious price discrepancies which resulted.

[16] *Id*.
[17] Linenberg, Michael J., Deutsche Bank Research Analyst (November 8, 2023), *The View from Wall Street*. ASTA Premium Business Summit. Indian Wells, California.

And contrary to AA's assertion that the complaint is an attempt to protect "certain agencies" (Ans. at 3), ASTA's complaint is indeed an effort to protect consumers, specifically the roughly 48 percent of all travelers who prefer to book through the agency distribution channel. The fact that ASTA also believes, with good reason, that AA's actions are motivated by its relentless march toward disintermediation does not in any way diminish or negate the demonstrated economic and non-economic injury that consumers have suffered as a result.

American also casts aspersions on ASTA's members, declaring that they seek to hold consumers "hostage to old technology" and are "stuck in the old way of doing business" by "choosing" not to invest in NDC (Ans. at 5). Later in its answer, AA goes further still and attempts to shift blame for the mess it created onto ASTA members, claiming that the association is acting "on behalf of the limited group of travel agents that stagnated in the EDIFACT status quo and are allegedly still not ready to modernize" (Ans. at 17). Nothing could be further from the truth. The reality is that AA was the party "not ready to modernize," as its solution was (and remains) unready to meet the needs of the industry, yet it forged ahead anyway despite the predicted chaos that ensued.

Worse, American baldly claims, "[e]ven ASTA concedes that NDC-enabled distribution is more transparent…" (Ans. at 5). ASTA made no such concession. To the contrary, it is the very lack of transparency that is at the heart of ASTA's complaint about AA's conduct. As noted, unlike booking through EDIFACT, fare data in NDC is *disaggregated*, making transparent comparison of fares among all airlines via the same channel impossible.

Similarly, AA states that "ASTA concedes, as it must, that NDC-enabled technology is far superior to the EDIFACT-based technologies it seeks to replace" (Ans. at 9). In a word, no. At this stage of NDC development, any superiority as compared with the EDIFACT channel remains largely theoretical. As detailed in the previous section, and altogether separate from the invidious channel price discrimination, significant limitations pertaining to routine booking and reservation servicing tasks remain.

With respect to the effects of airline deregulation, AA asserts that "ASTA concedes the widely acknowledged and well-documented fact that deregulation was successful" (Ans. at 23). Yet again, ASTA made no such concession. To the contrary, ASTA's complaint methodically documents the developments in the industry since 1978 that have eroded competition to its current state where, again, just four carriers now control more than two-thirds of the total market.

VII. CONCLUSION

The record makes plain that American's actions constitute an unfair practice in the sale of air transportation, made possible because of its dominant market position and a lack of meaningful competition in the industry. In this regard, AA's answer raises no points that would warrant a contrary conclusion. Accordingly, ASTA respectfully requests that the Department deny AA's request to dismiss the complaint, commence an investigation of American's practices pursuant to 49 U.S.C. § 41712 and, pending results of that investigation, institute enforcement proceedings pursuant to 14 CFR § 302.407 without further delay, along with such other and further relief as set forth in the complaint.

Respectfully submitted,

AMERICAN SOCIETY OF TRAVEL ADVISORS, INC.

By its counsel:

Peter N. Lobasso

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Peter N. Lobasso

VERIFICATION

Pursuant to Title 18 United States Code Section 1001, I Peter N. Lobasso, in my individual capacity and as the authorized representative of the pleader, have not in any manner knowingly and willfully falsified, concealed or failed to disclose any material fact or made any false, fictitious, or fraudulent statement or knowingly used any documents which contain such statements in connection with the preparation, filing or prosecution of the pleading. I understand that an individual who is found to have violated the provisions of 18 U.S.C. section 1001 shall be fined or imprisoned not more than five years, or both.

Peter N. Lobasso

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing REPLY OF THE AMERICAN SOCIETY OF TRAVEL ADVISORS, INC. TO THE ANSWER OF AMERICAN AIRLINES, INC. has been served by email this 20th day of December 2023, upon the following persons:

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