

August 24, 2010

Docket Management Facility
U.S. Department of Transportation
1200 New Jersey Ave., SE.
Room W12-140
Washington, DC 20590-0001

RE: Department of Transportation, Enhancing Airline Passenger Protections [Docket No. DOT-OST-2010-0140]

To Whom It May Concern,

I am writing to you on behalf of the Association for Airline Passenger Rights (“AAPR”) in response to the U.S. Department of Transportation’s (“USDOT”) Notice of Proposed Rulemaking (“NPRM”) on “Enhancing Airline Passenger Protections,” [Docket No. DOT-OST-2010-0140], RIN No. 2105-AD92. AAPR commends USDOT Secretary Ray LaHood for his strong leadership on improving passenger rights, including strengthening the rights of air travelers in the event of oversales, flight cancellations and long delays, and to ensure that passengers have accurate and adequate information to make informed decisions when selecting flights.

AAPR believes that these consumer protections – as well as the protection extended under the final rule published on December 30, 2009, in which the USDOT required certain U.S. air carriers “to adopt contingency plans for lengthy tarmac delays; respond to consumer problems; post flight delay information on their websites; and adopt, follow, and audit customer service plans” – are long overdue. For over a decade the airline industry has increasingly ignored the complaints and concerns expressed by a growing chorus of airline passengers, especially on domestic flights. U.S. air carriers have placed a greater emphasis on their profits rather than the comfort, safety and satisfaction of their customers.

Tarmac Delay Contingency Plans

AAPR contends that the effectiveness of the new tarmac delay final rule – including that domestic air carriers avoid cancelling a significant number of flights to avert potential fines – is directly related to tarmac delay contingency plans being in place. Only with the proper planning and better coordination between the air carriers and its crew, air traffic controllers, airport service crews and other personnel, will the final rule (and subsequent NPRM) governing tarmac delays avoid the dreaded fate predicted by the air carriers.

AAPR fully supports the four areas where the USDOT is seeking to strengthen the final rule – including 1) requiring foreign air carriers to adopt tarmac delay contingency plans, 2) increasing the number of airports at which carriers must adhere to their plans to include U.S. small and non-hub airports, 3) requiring carriers to coordinate their tarmac delay contingency plans with all U.S. airports they serve, and 4) requiring carriers to communicate with passengers during tarmac delays.

Firstly, **all international air carriers doing business in the U.S. should be required to adhere to the same set of rules and regulations governing their U.S.-based counterparts. Three hours is three hours, regardless if the air carrier is owned and operated here, or abroad; therefore, exceptions included in the final rule which exempt international air carriers should be changed accordingly.** It is ill-advised to leave the final decision on this important matter to “as determined by the carrier in its plan” – thus making it equivalent to leaving the fox to watch the hen house. The three hour time limit represents a fair compromise!

Additionally, AAPR urges the USDOT to avoid limiting a contingency plan to only include foreign carriers – or domestic carriers for that matter – that operate aircraft originally designed to have a passenger capacity of 30 or more seats to and from the U.S. The consumer protections included in the final rule – as well as the NPRM – should be guaranteed to **ALL** airline passengers, not simply those passengers who are lucky enough to have booked their flight on planes with larger capacities. In fact, the mere fact that smaller aircraft are often less equipped to adequately deal with many of the horror stories that have played out on airplanes during excessive tarmac delays should be evidence enough that a dual standard approach is ill-advised.

AAPR also supports expanding coverage of the requirement to adopt tarmac delay contingency plans to the carrier under whose code the service is marketed if different than the operating carrier. The USDOT should close as many loopholes in advance as possible, which this area represents the potential for one.

Secondly, AAPR commends the USDOT in recognizing that the problem of excessive tarmac delays encompasses more than the air carriers operating the flights, but also the airports themselves. Any layperson is most likely cautiously aware that certain airports – such as Chicago’s O’Hare, New York’s LaGuardia, New York’s JFK, Atlanta’s Hartsfield-Jackson or Philadelphia International – are plagued by excessive ground stoppages for various reasons, whether it is heavy traffic or inclement weather. The final rule’s coverage must be expanded, thereby requiring U.S. airports to adopt tarmac delay contingency plans because to do otherwise would be ignoring part of the problem leading to the delays in the first place. Excessive tarmac delays are not always weather-induced, but can be caused by heavy traffic flow in/out of a particular airport, late-arriving aircraft, and other aviation system delays. Good weather usually reduces delays, but the inefficient use of airspace is also an issue. About a third of all air traffic in the U.S. goes through the New York area, and delays here can ripple across the country. **Therefore again, an excessive tarmac delay is excessive regardless of where or why it occurs, just as it is excessive on domestic and international flights, alike.**

Furthermore, AAPR strongly urges the USDOT to require as part of both domestic and international air carriers’ tarmac delay contingency plans minimum guidelines for accommodating passengers with disabilities; these guidelines should be in concert with provisions included in the Air Carrier Access Act (ACAA) of 1986 (49 U.S.C. 41705), which provides that no air carrier may discriminate against any otherwise qualified individual with a disability, by reason of such disability, in the provision of air transportation.

Thirdly, AAPR believes that the USDOT has taken a common sense approach to revising the area of the final regulation that dictates certain U.S. carriers to coordinate their contingency plans with large-hub and medium-hub airports, as well as diversion airports that the carrier serves. This is especially important with high-flow areas such as Chicago, Los Angeles, Miami, New York and Philadelphia. It is important that the tarmac delay contingency plans cover operations at each U.S. large hub airport, medium hub airport, small hub airport and non-hub U.S. airport because the USDOT summarized the issue adequately enough when it stated in its NPRM, “*The Department believes that the same issues and discomfort to passengers during an extended tarmac delay are likely to occur regardless of airport size or layout.*” **AAPR applauds the decision to require air carriers to coordinate their plans with each U.S. large hub airport, medium hub airport, small hub airport and non-hub U.S. airport to which they regularly operate scheduled passenger or public charter service.**

Lastly, air carriers most-definitely should be required to update passengers every 30 minutes during an excessive tarmac delay – regardless of the circumstances. While most air carriers and their respective flight crews probably do an excellent job at keeping their passengers informed during excessive tarmac delays, it is an unquestionable sad state of affairs and poor reflection on the industry when there is the rare occurrence otherwise. Fare-paying customers deserve to be treated

with dignity and respect, and that includes being made aware of the circumstances that have forced them to remain stranded on the tarmac. Very often this simple gesture would appease many of the passengers, especially since they purchased tickets with the understanding their flight is scheduled to depart at the published time.

It seems quite ironic that the USDOT would even have to “regulate” this practice, but then again the air carriers have repeatedly demonstrated their complete lack of concern for their passengers. **With that in mind, it seems appropriate that passengers be notified that a tarmac delay begins when passengers no longer have an option to get off of the aircraft (e.g., when the doors of the aircraft are closed). Furthermore, it seems equally fair for passengers on flights that remain at the gate with the doors open that they are allowed off the aircraft if that is the case.**

With respect to the latter, last year, DOT issued new regulations governing ACAA’s accessibility standards. Under Subpart E of the regulations, which were effective on May 13, 2009, air carriers must ensure that all new videos, DVDs, and other audio-visual displays played on aircraft for safety purposes, and all such new audio-visual displays played on aircraft for informational purposes that were created under their control, are high-contrast captioned. The captioning must be in the predominant language or languages in which they communicate with passengers on the flight.

AAPR calls on the USDOT to ensure that any and all announcements pertaining to updates about an excessive tarmac delay be made available through available captioning and video description for the deaf and hard-of-hearing passengers and for passengers with vision loss. This accommodation standard would ensure that all passengers – including passengers with disabilities – are treated with the same level of dignity and respect.

Also, while the final rule stipulates that “for all flights, an assurance that the U.S. carrier will provide adequate food and potable water no later than two hours after the aircraft leaves the gate (in the case of a departure) or touches down (in the case of an arrival) if the aircraft remains on the tarmac,” it does not make clear what should happen if the former is not available? With respect to the availability of adequate food and potable water, any flight that cannot maintain this assurance to its passengers should be required to return to the gate immediately. The same holds true for any circumstance that involve inoperable lavatory facilities, or the need for adequate medical attention by a passenger(s). The aforementioned involve possible matters of life and death that go well-beyond simple “comfort” issues – but rather they encompass the “safety” of the passengers on board the delayed flight.

Take for example there is the very real likelihood that excessive tarmac delays pose serious health threats to passengers with heart disease; in such cases, deep vein thrombosis (DVT) can become a pulmonary embolism, in which a blood clot that forms in the deep veins of the leg or groin and breaks free, traveling through the blood to the lungs and resulting in a heart attack. When this scenario plays out on an airplane, it is actually referred to as “economy class syndrome” and too often these clots become fatal pulmonary embolisms. This scenario is very real and furthermore, it is very dangerous – which is why tarmac delay contingency plans should be required by all air carriers.

The USDOT is proposing “these regulations because the Department believes that it is important to ensure that passengers on all international flights to and from the United States are afforded protection from unreasonably lengthy tarmac delays.” We agree and fully support the steps being taken, and as where appropriate are calling for additional protections.

Tarmac Delay Data

The NPRM proposal requiring all carriers to comply with 14 CFR Code of Federal Regulations 259.4, including filing tarmac delay data with the Department, is completely appropriate, and therefore fully supported by AAPR. Domestic air

carriers have been fighting regulation – and legislation – governing excessive tarmac delays for over a decade, so the requirement to track data provides both sides, including supporters of the USDOT final rule and subsequent NPRM, to better evaluate their effectiveness. Data collection would allow the USDOT to move beyond the air carriers’ anecdotal stories, operational myths and perceived challenges, thereby better positioning the Department “to provide a complete picture of tarmac delays.”

The USDOT has demonstrated that it is attentive to the potential cost-burden for air carriers, especially smaller carriers, with this new reporting requirement. Since the data fields have been narrowed using the Part 234 requirements as a model, AAPR believes that the new reporting requirement represents good policy by the Department.

Since this requirement is self-explanatory, AAPR has abbreviated its comments with respect to it.

Customer Service Plans

In the NPRM, USDOT is proposing to cover foreign air carriers operating scheduled passenger service to and from the U.S. using any aircraft originally designed to have a passenger capacity of 30 or more passenger seats; it would apply to all flights to and from the U.S. of those carriers, including flights involving aircraft with fewer than 30 seats if a carrier operates any aircraft with 30 or more passenger seats to and from the U.S. **AAPR supports this change, and requests that the USDOT pay particular attention to properly accommodating disabled and special-needs passengers, including during tarmac delays (as previously mentioned in several aforementioned areas of our comments).**

While the USDOT is proposing “to cover foreign air carriers operating scheduled passenger service to and from the U.S. using any aircraft originally designed to have a passenger capacity of 30 or more passenger seats,” AAPR suggests that this provision be broadened to both domestic and international air carrier operating **ALL** flights in the U.S., regardless of the number of passenger seats. The USDOT should not be engaging in setting two different sets of standards with respect to passenger protections, whether they are designed to limit excessive tarmac delays – or improve overall customer service standards.

The USDOT provides ample evidence that it believes the well-being of airline passengers is at the heart of its NPRM when it states, “A substantial number of air travelers fly to and from the United States on flights operated by foreign carriers, whether through a code-share arrangement or by directly arranging for that transportation. By requiring foreign carriers to adopt plans, audit their own compliance, and make the results of their audits available for us to review, we intend to afford consumers better protection on nearly all flights to and from the United States, not just those of the U.S. carriers to which the rule is currently applicable.” Therefore, why not apply the same standard to **ALL** passengers?

Finally, AAPR strongly endorses and supports all of the following proposed minimum standards, all of which are designed to protect the rights and responsibilities of airline passengers:

“(1) offering the lowest fare available on the carrier’s website, at the ticket counter, or when a customer calls the carrier’s reservation center to inquire about a fare or to make a reservation;”

Airline passengers often complain that they have no idea what is the lowest published fare, often finding lower fares available on third-party websites. This practice makes it confusing, at best, and misleading, at worse, for airline passengers. Airline passengers should not be made to feel as if they’re walking onto a “used car lot” when attempting to purchase their airfare.

(2) notifying consumers in the boarding gate area, on board aircraft, and via a carrier's telephone reservation system and its website of known delays, cancellations, and diversions;

This is common sense, but unfortunately not standard practice – especially with large-hub and medium-hub airports by some of the air carrier personnel. Sometimes iPhone applications, such as FlightTracker, are quicker to post changes.

(3) delivering baggage on time, including making every reasonable effort to return mishandled baggage within twenty-four hours and compensating passengers for reasonable expenses that result due to delay in delivery;

Lost and mishandled baggage continues to be among the most common complaints registered by airline passengers, yet air carriers seem to believe that most things in this area are doing just fine – but they're wrong!

(4) allowing reservations to be held at the quoted fare without payment, or cancelled without penalty, for at least twenty-four hours after the reservation is made;

This standard would represent a very small gesture on the part of air carriers, but unfortunately it is a poor reflection of the state of the domestic airline industry that the USDOT would even have to include this provision as part of the minimum customer service standards. Again, common sense!

(5) where ticket refunds are due, providing prompt refunds for credit card purchases as required by 14 CFR Code of Federal Regulations 374.3 and 12 CFR Code of Federal Regulations Part 226, and for cash and check purchases within 20 days after receiving a complete refund request;

This standard would be strengthened if the refund policy was more clearly stated at the time of purchase, much like the USDOT is attempting to accomplish with item #1 under these minimum standards. Fees, penalties, surcharges, etc. should also be to an absolute minimum, or eliminated altogether when air carriers process them, too.

(6) properly accommodating passengers with disabilities as required by 14 CFR Code of Federal Regulations Part 382 and for other special-needs passengers as set forth in the carrier's policies and procedures, including during lengthy tarmac delays;

The USDOT should be doing more to enforce ACAA, especially since passengers with disabilities increasingly complain about poor air travel experiences and lack of understanding their accommodations. As previously noted, additional protections should be included in tarmac delay guidelines to adequately ensure that passengers with disabilities are afforded the same level of respect and dignity.

(7) meeting customers' essential needs during lengthy tarmac delays as required by 14 CFR Code of Federal Regulations 259.4 and as provided for in each covered carrier's contingency plan;

This standard bears repeating the question: With respect to the availability of adequate food and potable water, any flight that cannot maintain this assurance to its passengers should be required to return to the gate immediately. The same holds true for any circumstance that involve inoperable lavatory facilities, or the need for adequate medical attention by a passenger(s). The aforementioned involve possible matters of life and death that go well-beyond simple "comfort" issues – but rather they encompass the "safety" of the passengers on board the delayed flight.

(8) handling “bumped” passengers with fairness and consistency in the case of oversales as required by 14 CFR Code of Federal Regulations Part 250 and as described in each carrier’s policies and procedures for determining boarding priority;

This standard is weak as currently proposed by the USDOT; it should be improved by prohibiting air carriers from selling tickets on flights that are already booked to capacity. The very idea that air carriers are permitted to continue to sell seats after the flight is “oversold” is outdated and represents a misleading business practice. Furthermore, compensation levels for bumped passengers are NOT equivalent to how the air carriers treat airline passengers who cancel, change or miss their flight – and the USDOT should address this inequity during the NPRM process.

(9) disclosing cancellation policies, frequent flyer rules, aircraft configuration, and lavatory availability on the selling carrier’s website, and upon request, from the selling carrier’s telephone reservations staff;

This standard is common sense, too.

(10) notifying consumers in a timely manner of changes in their travel itineraries;

The air carriers are handling this practice sufficiently, but nonetheless another common sense standard.

(11) ensuring good customer service from code-share partners operating a flight, including making reasonable efforts to ensure that its code-share partner(s) have comparable customer service plans or provide comparable customer service levels, or have adopted the identified carrier’s customer service plan;

The USDOT would ultimately achieve this objective by requiring a minimum set of customer service standards.

(12) ensuring responsiveness to customer complaints as required by 14 CFR Code of Federal Regulations 259.7;

The USDOT should consider strengthening this standard, because using the words “responsiveness” and “customer complaints” in the same sentence when discussing the airline industry is an oxymoron. Airline passengers routinely complaint (on top of their original complaint) that the lack of responsiveness by the air carrier – or simple “form letter” response to the complaint – is equally frustrating. The problem is compounded because the USDOT’s Office of Aviation Enforcement and Proceedings, Aviation Consumer Protection Division (ACPD) is a toothless enforcement division; more follow-up reporting should be required to ensure that complaints submitted to ACPD go beyond the agency simply sharing it with the air carrier.

and (13) identifying the services it provides to mitigate passenger inconveniences resulting from flight cancellations and misconnections.”

When cancellations and misconnections occur for reasons other than inclement weather or force majeure, it should be the responsibility of the airline to provide adequate services to mitigate passenger inconveniences, including but not limited to, meal vouchers, hotel accommodations and transportation services. Yet, these services are often not well-known to the passengers and left to the discretion of the airline personnel at the airport; therefore, the USDOT should take added steps to educate airline passengers on their rights – including posting easily downloadable F/Qs about what services are available, and under what circumstances.

Contracts of Carriage

Unfortunately, contracts of carriage have become nothing more than the fine print that the air carriers use to create exceptions to the rule only further aggravating airline consumers. **That said, AAPR fully supports the Department's proposed rule requiring carriers (U.S. and foreign) to include their contingency plans and customer service plans in their contracts of carriage.**

Response to Customer Problems

By monitoring flight delays, flight cancellations, and lengthy tarmac delays is essential to the passenger protections that have been proposed by the Department are implemented effectively by the air carriers. As has been previously stated, these protections should be afforded to passengers regardless of whether they're flying on a domestic or foreign air carrier. **Therefore, AAPR supports the proposed change requiring foreign carriers to adhere to the same standards as domestic carriers.** With that, however, the Department should evaluate how effective air carriers are in adequately responding to consumer complaints; often times, AAPR members report that complaints to the air carriers go unanswered.

With respect to any operational difficulties U.S. and foreign air carriers may face in responding to consumer complaints received through social networking mediums such as Facebook or Twitter, AAPR contends that consumers should submit their formal complaint using standard mail via postage, or by using the airline's website. Even if the air carriers are communicating with its passengers using social mediums, complaints are better handled using more traditional methods.

Oversales

The process by which air carriers can continue to oversell their flights is outdated and should be completely changed.

Unfortunately, since the Department feels that Part 250's "basic structure remains sound," AAPR's comments will address minimal revisions being proposed by the Department.

The NPRM proposes to make five changes to Part 250: (1) increase the minimum DBC limits to take account of the increase in the Consumer Price Index ("CPI") since 1978; (2) implement an automatic inflation adjuster for minimum DBC limits; (3) clarify that DBC must be offered to "zero fare ticket" holders who are involuntarily bumped; (4) require that a carrier verbally offer cash/check DBC if the carrier verbally offers a travel voucher as DBC to passengers who are involuntarily bumped; and (5) require that a carrier inform passengers solicited to volunteer for denied boarding about its principal boarding priority rules applicable to the specific flight and all material restrictions on the use of that transportation.

AAPR supports all of these changes. Specifically, by establishing a CPI-indexed adjustment to the DBC limits the Department is creating the monetary incentive for carriers to reduce involuntary denied boardings that it is seeking. Additionally, zero fare ticket holders should most definitely have the same rights and eligibility for DBC as any other passenger who used cash, check or credit card to purchase his or her airfare! Simply because the passenger did not "purchase" the ticket does not mean there is no "value" to the ticket, and therefore the passenger should be adequately compensated if bumped from the flight. Considering that it would be difficult to determine the actual "value" of the zero-fare ticket, bumped passengers under this scenario should be offered the choice of using the fare of the lowest priced ticket available (paid by cash, check, or credit card) for a comparable class of ticket on the same flight, or compensated using the same "currency" in which the tickets were obtained, such as frequent flier miles. The Department's proposed changes with respect to the required disclosures under 250.2b, 250.9 and 250.11 seem appropriate and fair.

Full Fare Advertising

With the advent of Internet marketing – and now with social mediums such as Facebook and Twitter – air carriers are increasingly coming up with new and innovative ways to advertise their standard fares, as well as special deals. Sometimes, it can be extremely difficult to find the full cost of the airfare. The proposed amendment to the Department’s rule on price advertising (14 CFR Code of Federal Regulations 399.84) is long overdue. Any and all methods for the Department to strictly enforce the “full fare advertising” provisions is strongly encouraged! Additionally, with more air carriers now taking a “nickel and dime” approach to their ancillary fees, often times passengers find themselves at the airport check-in counter being assessed fees that they were unaware existed, and at that point in time there is little or nothing that they can do but pay the fees. This seems at worst unfair and deceptive or at best disingenuous by the air carriers. **AAPR contends that there should be few exceptions to the full fare advertising provisions, and therefore supports the Department’s attempt to strengthen these provisions!**

Baggage and Other Fees and Related Code-Share Issues

AAPR commends the Department for recognizing the need to enhance protections for air travelers by establishing rules to ensure adequate notice of such fees for optional services to consumers. While AAPR supports the “unbundling” of fares, it is increasingly concerned that the air carriers going down a slippery slope with respect to some of them. Take for example, Spirit Airlines announcement that beginning August 1, 2010, customers will be charged \$45 for carry-on luggage if paid at the gate, and \$30 if paid in advance. Spirit Airlines already charges its customers \$25 for checked luggage if paid at the gate, and \$19 if paid in advance, and an additional \$25 after the first bag. Carry-on luggage is **not** a luxury, but rather a necessity for most air travelers – especially business travelers flying on short-term business trips. It begs the question, what is next – are air carriers such as Spirit Airlines going to begin charging its customers for seat belts? Last year, air carriers worldwide took in \$13.5 billion from fees alone. That represents a 43 percent increase over the previous year; at the same time, carriers are now charging more for their fares, too. Yet, airline passengers are NOT seeing an improvement in service.

The NPRM accurately characterizes the concern shared by the vast majority of air travelers, that there is “a lack of clear and adequate disclosure, consumers are not always able to determine the full price of their travel (the ticket price plus the price of additional fees for optional services) prior to purchase.”

At this time, AAPR is not prepared to endorse one approach over another with respect to the transparency of “unbundled” fares – rather, we urge the Department to establish minimum standards that the air carriers must adhere to. Among these standards should be a list of items that the air carriers are prohibited from charging ancillary fees – including, but not limited to carry-on baggage, flight itinerary changes, and bathroom use (recognizing that the foreign carrier Ryanair levies such fees on its passengers). Additionally, air carriers should be required to list the full fare on their website along with the fees associated with all the various available services that could impact the total cost of the airfare. The listing of all the possible fees – such as the cost of a carry-on bag, checking baggage, advance seat assignments, in-flight food and beverage service, in-flight entertainment, blankets, pillows, or other comfort items, and fees for seat upgrades – should be clearly accessible, centrally-located and easily-readable during the online booking process, or summarized during the ticketing process over the phone or in person with a ticketing agent.

Post-Purchase Price Increase

AAPR strongly endorses the Department’s proposal of an outright ban on post-purchase price increases.

Flight Status Changes

The flight status requirement proposed by the Department needs to be more stringent because why is it so difficult for the air carriers to inform their paying customers about what is happening with their flight? In the 21st century that has been fueled by technological innovation over the last decade, there is certainly no excuse for such information to be shared in a timely manner. Why is this so difficult?

AAPR disagrees with the Department's assessment that requiring smaller carriers to provide this information outweighs the benefits to consumers. Therefore, all air carriers – whether large or small – should be required to promptly notify passengers in the boarding gate area of changes to their domestic scheduled flights resulting from delays or cancellations, promptly update all domestic scheduled flight information under their control at airports regarding changes to the status of particular flights as a result of delays or cancellations and promptly update flight status details available on their websites and through their telephone reservation systems. The 30-minute requirement is not too burdensome.

Unfortunately the air carriers have shown little credence to “doing the right thing” when left to self-govern, especially in areas pertaining to customer service. With that, AAPR supports the Department prescribing particular means by which carriers must communicate or must make available flight status updates. We urge the Department to require ALL four proposed means of notification – an announcement in the boarding area, carriers' websites, carriers' telephone reservation systems, and airport displays under carriers' control – be mandated as part of this section. The premise behind requesting a more comprehensive approach to notification standards is directly related to the same technological advances that have revolutionized the airline industry as a whole.

Unlike other modes of transportation, airline passengers are at the whim of the air carrier (which is exactly why the tarmac delay final rule was long-overdue). This is especially true when the travel includes connection(s) in another city, where significant flight delays or cancellations can cause passengers to incur significant costs. Keeping passengers “in the know” at least empowers them to make informed decisions about their options during such circumstances.

Choice-of-Forum Provisions

AAPR strongly endorses the Department's proposal to amend 14 CFR Code of Federal Regulations Part 253, by adding a new section to codify the policy that choice-of-forum provisions are unfair and deceptive when used to limit a passenger's legal forum to a particular inconvenient venue.

Effective Date

AAPR supports enacting the changes 180 days after its publication in the Federal Register.

In closing, gone are the days of the purported “golden age” of air travel – but that doesn't mean that airline passengers should be treated as an expendable commodity by the airline industry. The passenger bill of rights, including the tarmac delay regulation issued late last year by the Department, are common sense changes that are long-overdue. Thank you.

Sincerely,

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