



15 November 2017

Ref: *Leg/09.3.1/01.1*

Gavin Jones
Director
Adjudication
GPO Box 3131
Canberra ACT 2601

Phone: 642 6243 1111

Dear Mr Jones,

Subject: **Authorisation AA1000400 - QF-Emirates Alliance**

Jumpjet views are known concerning the current state of the international airline market and we make challenge on the basis of invitation and the relevance to the Single Aviation Market.

Our analogies are well documented and based on formally available data and considerable research.

Aviation industry development is only possible when significant market share is held in the hands of our national carriers within national interest rules of engagement. No doubt the Commission is aware that foreign carriers do not play by the same commercial rules as our carriers are required to follow.

Alliance structures have delivered almost 70% of the market to the rest of the world when foreign ownership considerations are included in analysis. In 2016 some 48 Foreign carriers operated to and from Australia - saturating the market and raising risk levels to global status. Thus, adversely impacting on national investment.

The well used test of public benefit versus the public detriment reveals no real gain to Australians from the development pursuits of Australian carriers developing markets in foreign countries. In fact no Australian company, at international level, owns any overseas airline. At best minor shareholdings are held with branding.

The timid alliance authorisations system has failed to arrest the dissolution of our markets. Thus, we have simply lost the plot and will eventually lose the lot!

Thank you for your time in this matter and the opportunity to comment.

Cordially,

Nick Kile
Managing Director