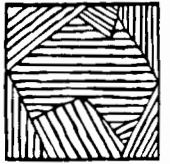


LEVEL 3
309 PITT STREET
SYDNEY
NSW 2000
AUSTRALIA
TEL (02) 9264 3299
FAX (02) 9264 1085



A·F·T·A
THE AUSTRALIAN
FEDERATION
OF TRAVEL AGENTS
LIMITED

ABN 72 001 444 275

9 April, 2005

The General Manager
Adjudication Branch
Australian Competition and Consumer Commission
PO Box 1199
DICKSON ACT 2602

By email: adjudication@accc.gov.au

FILE No:

DOC:

MARS/PRISM:

Attention: Mrs Isabelle Arnaud
Director, Adjudication

Dear Madam

**International Air Transport Association – Passenger Agency Program
Applications for Minor Variation to Authorisation A90791**

1. We refer to your letter of 17 March 2005 and the applications for minor variation of authorisation lodged by the International Air Transport Association (IATA) in respect of the Passenger Agency Program (PAP). The Australian Federation of Travel Agents (AFTA) makes the following submissions in response to the said applications.
2. These submissions respond to the IATA submissions which form Schedule 3 to the Application dated 11 March 2005 and 23 December 2004.

IATA Application of 11 March 2005

3. The Commission in its determination (Authorisation 90791) at clause 9.30 stated: "Given the potential significance for an accredited agent which has signed the PSAA of being denied plates by an airline in general concurrence, and given the inconsistency between an airline entering

AUST. COMPETITION &
CONSUMER COMMISSION
CANBERRA

12 APR 2005

general concurrence and denying an agent plates, the Commission proposes to make authorisation conditional upon IATA within two years of the date of this determination taking effect:

- making entry into general concurrence by an airline conditional upon the airline providing a statement of reasons to both the agency and the Executive Council Australia (EXCAU) in relation to any agent in Australia which it refuses plates or from which it withdraws plates”.
4. IATA both in response to the draft determination and at the pre-determination conference stressed that the regulations which govern the PAP are determined by member airlines and not by IATA. As the Commission noted at paragraph 9.31 of the determination, at the 2002 IATA Passenger Agency Conference (PACConf) the delegates agreed to communicate to agent representatives of the Global Consultative Committee (GCC) that they were prepared to accept a revised version of the Passenger Sales Agency Agreement (PSAA) which included a provision whereby a carrier which refuses to place its “Traffic Documents” or “Carrier Identification Plates” with an agent or subsequently withdraws them, then for that carrier to provide the agent with the reasons in writing.
 5. Notwithstanding the agreement reached at the 2002 PACConf the revised PSAA containing the above provision was never adopted by the IATA membership.
 6. At paragraph 2.2 of the IATA submission reference is made to a statement made by Mr Hatton at the pre-determination conference to the effect that travel agents had no problems with Qantas in Australia regarding the question of issuing of plates. Whilst that accurately reflected the position as at the date of the pre-determination conference, that position has now changed: AFTA is aware of incidences where an IATA accredited travel agent has been refused plates by Qantas on the basis that the airline has determined that the agent lacked financial viability notwithstanding the fact

that the agent had met the IATA financial criteria as part of the accreditation process. The commission should further note that Qantas is the only full IATA member operating in the Australian domestic market, and therefore enjoys a dominant position in this market for domestic sales made through the GDS and BSP mechanism.

7. In answer to paragraph 2.2 of the IATA submission, what IATA does not highlight of course is that the introduction of the Billing and Settlement Plan (BSP) into a country reduces the necessity for an airline to have a physical presence in that market. Under pre-BSP conditions member airlines had the onerous task of distributing and controlling their own ticket stocks with all the associated risks.. Under BSP conditions that situation changed as it was now possible, using the BSP, for an airline to provide all accredited agents in a BSP country with its plates in the hope of picking up sales which would otherwise not have been available to it. Historically, especially in Europe, under pre-BSP conditions it was an individual airline ticket stock which was most widely distributed amongst agents in a country which tended to be used by default on behalf of non-ticket depositing airlines. This created valuable cash flow and market intelligence advantages stemming from such windfall transactions. The introduction of BSP of course provided agents with airline neutral tickets.
8. It is submitted that once distributed, airline plates are self-sustaining and do not need airline support. If airlines wish to provide that support then that is a marketing decision made by the airline in its own self interest. The BSP machinery and the agent as the ticket issuer does most of the work. However, a physical presence by an airline in a market is not a requirement of BSP.
9. At paragraph 2.3 of the IATA submission IATA restates that all IATA does is to implement rules and manage the program on behalf of member airlines, and that ultimately it is the members who determine the provisions for the conduct of the IATA Traffic Conferences. With respect to IATA this is a disingenuous argument. The original application (No. A90791)

was lodged by IATA seeking authorisation for the IATA PAP. Authorisation was subsequently granted subject to the imposition of conditions. It is insufficient for IATA to then respond that it has no ability to implement resolutions required as a condition of the granting of authorisation whilst its members still take the benefit of the authorisation.

10. AFTA is not aware of any instance where an IATA Traffic Conference has refused to accede to a condition imposed by a regulator as part of the granting of approval to a Conference Resolution. To the contrary, IATA can provide a number of examples in which the requirement of a government regulator has resulted in IATA Traffic Conferences making the requisite changes.
11. The creation of Resolution 814 (the Area 2 precursor to Resolution 816) which approximately 20 years ago liberalised the agency program in Europe, was done at the behest of the European Commission (EC). The EC made it clear to IATA that any resolution not containing the criteria the EU spelt out to the Passenger Agency Conference (PACConf) would be disapproved and disciplinary action might thereafter be expected. On that occasion, an EC official addressed a session of PACConf in person. Resolution 814 was adopted by the PACConf.

Action since authorisation

12. AFTA is critical of IATA's attempt to implement the condition. IATA was aware of the two years implementation requirement placed on it by the Commission and yet did not act until shortly before the expiry of the two year term. The resolution was put to a mail vote of IATA members. AFTA understands there were 26 votes against the resolution. As the Commission will be aware, a resolution determined by mail vote will fail if there is a single vote against it.
13. The Commission is aware that the next PACConf is to be held in June this year in Singapore. IATA has provided the Commission with no

information (other than to say that it does not wish to risk a second mail vote) as to what steps it has taken to have a resolution in respect of the condition put before the June PAConf, or whether there is sufficient time under the IATA regulations to distribute a resolution for consideration at the PAConf. Indeed IATA states that “it will not be an easy task to convince airlines to do so”.

14. The PAConf regulations allow for a government regulator or a party with an interest in an agenda item to attend the PAConf and address the meeting. Should it be necessary the Commission could send a representative to the Singapore PAConf in order to inform IATA members of the Commission’s requirements in order for the PAP to be authorised in this country. This may be a solution to the problems IATA have alluded to in paragraph 2.7 of its submissions.

The condition-essential issue

15. In response to paragraph 3.1 of the IATA submission, the Commission identified that the obligation to provide reasons should be automatic upon the decision being made to refuse or withdraw plates and should be given by the airline concerned: it was not intended that a prerequisite for giving reasons must be a request by the agent. Further, the obligation to provide reasons was contemplated in clause 4.1 of the now abandoned revised PSAA.
16. AFTA notes that at paragraph 3.2 of the IATA submission that IATA does no more than state it “can probably” achieve airline support for the changes required by the Commission as a condition of authorisation. However IATA is not prepared to tell the Commission that its members will do all things necessary (including the passing of the appropriate resolutions) to comply with the conditions of authorisation.

Problems with the condition as formulated

17. The following submissions address the “problems” identified by IATA in its submission. In AFTA’s opinion, subject to one exception, the problems identified by IATA in fact do not arise.

Conditioning General Concurrence - ‘General Concurrence’ not limited to Australia

18. General concurrence is a country by country mechanism. A review of every list published by IATA in the Travel Agent’s Handbooks shows that few airlines issue a single letter to IATA proclaiming that they generally concur worldwide to all appointments. As the Commission will be aware, the Travel Agent’s Handbook is published either nationally or for regions but not globally. Therefore the term “worldwide facilitative mechanism” is misleading.
19. The Commission’s attention is drawn to the schedule regarding General Concurrence published by IATA in the Travel Agent’s Handbook applicable for Australia To assist the Commission a copy of the Schedule which appears at pages 121 – 122 of the Travel Agent’s Handbook Resolution 816 Edition (January 2003) is attached. IATA states:

“The following Member Airlines have deposited a statement of general concurrence with the Agency Administrator for the appointment of Accredited Agents in Area 3 in accordance with the provisions of Section 4 of the Passenger Sales Agency Rules – SWP”.

In other words the general concurrence is in respect of Area 3 only.

20. The Commission’s attention is also drawn to the notes which form part of the Schedule which specify limitations placed by specific airlines on their general concurrence. For example Air Canada has limited its general

concurrence in relation to Bangladesh, India, Nepal, Pakistan, and Sri Lanka, and other airlines have similarly limited their general concurrence in various areas.

21. It follows from the above that member airlines have lodged separately with the Agency Administrator a general concurrence applicable for Area 3 only.
22. The schedule makes reference to 79 airlines having signed the general concurrence for Area 3 out of a total IATA membership of 248 (see schedule 1 to the IATA submission). When one takes into account this statistic together with the limitations laid down in notes 1 to 10 to the Schedule, it is difficult to see how IATA can maintain the position that general concurrence “is a worldwide facilitative mechanism”.
23. In reply to paragraphs 4.2(a) (iv) and (v), many airlines’ statements of general concurrence have been in place, untouched for many years. AFTA suspects that if those records were to be audited one would find many gaps and omissions. For example, the Commission could enquire as to how many members who have joined IATA, say in the last five years, have actually filed a letter of general concurrence. Further, IATA asserts that 130 airlines have issued letters of general concurrence but IATA fails to mention how many are conditional or limited and why the remainder of the IATA membership (some 118 members) have not sent the Director General their letter. The simple answer of course is that airlines do not bother to do so.
24. IATA has chosen a construction of the condition in a way that it is simply not borne out by the facts. The wording of the condition does not give rise to two separate classes of airline members. Even if IATA’s construction were to prevail the matter may be resolved by member airlines lodging new or revised general concurrences applicable to Australia. The problem is not one of feasibility as asserted by IATA but really one of convenience.

25. Similarly, the construction placed by IATA on the condition that it applies to any airline, anywhere in the world, that enters into general concurrence whether or not the airline operates services to Australia, can simply be resolved by the lodgement of a new or revised general concurrence with any limitations imposed on it as the airline may require.

The meaning of "Agency"

26. The Commission in granting authorisation has made numerous references to the three core elements of the PAP, namely an accreditation scheme which enables licensed agents to sell tickets on behalf of airlines; a process of appointing agents to represent airlines, and a system for managing the reporting and payment of ticket sales.
27. It is clear that the PAP is of and concerning *accredited* travel agents. Indeed the definition of "Accredited Agent" which appears in Resolution 816 is expressed as:

"(sometimes referred to as 'Agent') means a Passenger Sales Agent whose name is entered on the Agency List."

28. The condition that an airline must give reasons to an agent can only refer to an IATA accredited agent.

Traffic Documents

29. Contrary to IATA's submissions there are definitions of "Traffic Documents" within the IATA resolutions. For example PAConf Resolution 866 (and the subject of IATA's second application) has a definition for the term. The Commission only needs to refer to the definitions section of resolution 816 to find the following definition of "Traffic Documents":

"Means the following forms issued manually, mechanically or electronically for air passenger transportation over the lines of the

Member or Airline and for related services, whether or not they bear a pre-printed individual Member's identification”

The definition then goes on to provide a detailed description of:

- (a) Carriers' own Traffic Documents, and
 - (b) Standard Traffic Documents.
30. In response to the IATA statement that airlines do not place their own ticket stocks with agents, not all airlines are in the BSP and those who stay outside are entitled to deposit their own dedicated ticket stocks with their appointed agents.
31. In the EU member states and because of a requirement of the EC, any BSP airline is at liberty to place its own tickets alongside the IATA Standard Traffic Documents. This is but another incidence of a regulatory condition being accepted by PConf.

Executive Council

32. Evidence was put before the Commission that the membership of the Executive Council Australia (EXCAU) had been altered so that travel agents had obtained equal representation. The EXCAU may make recommendations to the General Assembly South West Pacific (SWPGA) on matters within its jurisdiction, or on which the EXCAU would like the SWPGA to provide advice to PConf. At the time of the making of the determination the EXCAU was the highest forum within the IATA hierarchy in which travel agents had equal representation.
33. Having said that travel agents have for a number of years requested without success that the status of the EXCAU be changed to an Agency Programme Joint Council (APJC). An APJC has the authority to make local decisions on the PAP and such decisions are binding upon IATA members. The

EXCAU as a consultative body can be overridden by IATA members at any time.

34. IATA's response to agents' requests to change the status of EXCAU has been that the SWPGA always accepts a recommendation from the EXCAU and therefore the change of status is not necessary. However as was clearly evident when the agent delegates of the EXCAU recommended against the change in the BSP billing cycle to seven days IATA members implemented the new cycle in Australia contrary to agent delegates of the EXCAU's wishes
35. Agents continue to have problems with the workings of EXCAU: for example there has been a constant refusal by the IATA members on the Council to allow AFTA delegate status (AFTA only enjoys observer status). It is AFTA's submission the cooperation at the EXCAU level is fragile and there is no guarantee that the cooperation will continue into the future.
36. Notwithstanding these problems with the functioning of the EXCAU, that body represents the highest level of consultative involvement for travel agents. As such the EXCAU can operate as an independent body to receive a statement of reasons from an IATA member airline. Whilst AFTA acknowledges that notification to the EXCAU is not without its potential problems this in itself should not be the basis for IATA's non-compliance with the Commission's requirement.
37. The problems identified by IATA could be resolved as follows:
 - (i) The members of the EXCAU could be governed by a code of conduct which would impose obligations of confidentiality;
 - (ii) AFTA strongly supports the concept that the reasons for refusal or withdrawal should be given to a third party. If the Commission was mindful of accepting IATA's submissions

regarding notification to the EXCAU, a possible alternative would be to have the notification lodged with the Travel Agency Commissioner (TAC) or the Chief Executive Officer of AFTA.

Proposed alternative condition

38. AFTA does not agree with the proposed alternative condition as it shifts the onus onto the agent to request reasons for the granting or withdrawal of airline plates, rather than providing an obligation on the airline to provide them. This was not what the Commission contemplated in the original condition.
39. If the Commission is mindful of amending the form of the condition set out in paragraph 10.2(3) of the authorisation then AFTA submits the following should be included in the condition as amended:
- Deletion of the requirement that the request for a reason must be initiated by the agent;
 - If an IATA member airline which has entered into general concurrence determines to either refuse an agent Traffic Documents or Carrier Identification Plates or to withdraw such documents or plates the agent must be given reasonable notice of such an intention. In AFTA's opinion a reasonable period of notice would be 60 days;
 - During the notice period the agent would have the right to appeal the decision of the IATA member to the Travel Agency Commissioner;
 - As a concession AFTA will agree to the deletion of the requirement that the EXCAU be notified of any such decision to be replaced by an obligation to notify the Travel Agency Commissioner.

40. IATA has pointed out that in order to implement the condition an amendment to Resolution 816 is required. Notwithstanding that IATA has had more than two years to attend to this, the next opportunity to do so is the June 2005 PAConf. IATA operates on a strict timetable for matters to be submitted to PAConf. AFTA understands that the due date for submissions has already passed. AFTA however assumes from the comments at paragraph 5.2 of the IATA submission that IATA is able to put this matter to the June 2005 PAConf notwithstanding the conference submission deadline.

Status of current condition

41. AFTA has considerable concerns that the condition either in its current form or as the Commission may amend will not be adopted by IATA members. Clearly, if IATA submits the resolution to a mail vote it will fail for a second time.
42. AFTA submits that the Commission should mandate to IATA that the appropriate resolution be passed at the June 2005 PAConf and be given immediate effect upon successful passage through the PACONF. As we have attempted to set out in these submissions there are many examples where the wish of a regulatory authority has been acceded to by PAConf, and it is simply not acceptable for IATA to continue to assert that the Commission has no entitlement to impose such a condition, or that the IATA Secretariat has no power to convince its members to adopt a resolution.
43. There is a very real risk that if a resolution does not go through the June 2005 PAConf then it will not be considered until the next PAConf in mid 2006 with an effective date of 1 January 2007. AFTA submits that a delay of this magnitude given that authorisation was granted on 13 November 2002 is unacceptable.

44. In the circumstances AFTA is of the opinion that the Commission should address the June 2005 PAConf to convey to IATA members that the conditions are a prerequisite for the granting of authorisation.
45. AFTA submits that the proposed amendment to the condition is not minor as defined in Section 91A of the Trade Practices Act 1974. The proposed amended condition is not a substitution of the condition as laid down by the Commission, nor does it give effect to the Commission's apparent original intention. To the contrary, the proposed amendment removes the obligation on airlines to give reasons and makes the giving of reasons only required if requested by an agent. Further, the draft could be interpreted as applying only to those airlines which have already entered into general concurrence in relation to Australia and not to airlines who in the future enter into general concurrence. The condition as imposed by the Commission should determine that entry into general concurrence by an airline is conditional upon the airline providing a statement of reasons.
46. It is submitted that the proposed amendment goes to the essence of the condition and therefore should not be amended in the form as sought by IATA.

Application for Minor Variation of Authorisation dated 23 December 2004

47. The following submissions are in response to IATA's application of 23 December 2004 for minor variation of Authorisation A90791.
48. The basis of IATA's submission is that the proposed changes liberalise provisions relating to satellite ticket printers (by separating them from the General Sales Agency Rules) and that the remaining changes covered by the application are minor technical changes which would have a neutral effect.
49. AFTA takes issue with IATA that as there has been consultation with travel agents on these changes prior to their adoption this somehow conveys that

travel agents are in agreement with such changes. AFTA opposes granting of the authorisation to the following amended resolutions which are the subject of the application.

Res 800b – Satellite ticket printer and ticket delivery locations

50. Reference is made to page 13 paragraphs 5.1.1(e) and (i) of the IATA submission. The Accreditation Review Committee has recently recommended alteration to the requirements for security as far as travel agents are concerned including the elimination of safes. The provisions of the resolution are therefore inconsistent with the Committee's findings. The Accreditation Review Committee was established at the direction of the Commission as part of the granting of authorisation. Agents therefore find that IATA amends conditions applicable to them in a way contrary to the findings of the Review Committee on which sits IATA representatives.
51. The adoption of the Committee's recommendation will conflict with the following sections of Resolution 800b:
 - 4.1(a), (b), and (c);
 - 5.2 and 5.

Resolution 800z – Electronic Ticketing

52. This resolution requires agents to provide passengers with applicable legal notices at the time of issuing an electronic ticket. However the agent acts as an agent of the airline and does not physically issue the electronic ticket: as this is done by the carrier. Some airlines do provide the conditions of carriage with their electronic tickets however some do not (for example some carriers refer passengers to its website for its terms and conditions). A travel agent can only do what an airline enables it to do.
53. The resolution makes it obligatory on travel agents to provide these notices which is at times physically impossible to do. However failure to do so puts an agent in breach of the PSAA.

Resolution 816(2) and (3)

54. AFTA does not object to these amendments.

Res 816 Section 5

55. The amendment provides that if an agent does not make use of Standard Traffic Documents in its possession for a period in excess of six months then BSP stock will be removed. However if an agent requests the provision of new stock it shall be subject to a BSP inspection and a review of its financial standing.
56. IATA submits that such withdrawal will not affect an agent's accreditation (page 33 Schedule 4 item 816). However the amendment as proposed provides that an agent on requesting new stock will be subject to conditions (financial review and a BSP inspection) which in effect are a de facto reapplication for accreditation.
57. AFTA submits that if documents are withdrawn and accreditation is to remain in place then the resolution should reflect this. Alternatively, the requirement of a BSP inspection and a review of the agent's financial standing should be deleted.

Res 816(9) – Passenger Sales Agency Rules – South West Pacific

58. The amendment to sub-paragraph 9 removes the reference to a fixed value of amounts on partially or wholly refunded tickets. This amendment places a further financial burden on travel agents as it removes the monetary threshold on the amount that an airline may recall.

Res 816(10)

59. AFTA does not object to this amendment.

Res 850 – Billing and Settlement Plans

60. The amendment provides that where a participating airline issues electronic tickets on behalf of agents through an airline's website then such sales may be reported to BSP for processing. This provision directly contradicts the PSAA. It is IATA's stated position that the PSAA does not cover sales made over the internet.
61. Further, the resolution is silent as to whether such reporting includes collection from travel agents of moneys for the tickets processed through the website, or merely the reporting of the sales through the website into BSP for consolidation for airline information purposes only.
62. Most sales over the internet are by way of credit card and the IATA credit card resolution clearly states that internet sales are not covered and internet sales using credit cards can only be effected by an independent agreement between the agent and the airline outside of the PSAA. (IATA Resolution 890 Para 2.1.4)

Res 850m – Code of Best Practice for ADMs

63. Travel agents now find themselves in a position where Agency Debit Memo(s) (ADM's) are being used for every type of debit by an airline. An ADM should only be used to adjust a Traffic Document. Travel agents and the GCC have never agreed to these amendments. In fact the resolution was amended by the PAConf after the GCC had agreed on a different form of the resolution. The resolution agreed and approved by the GCC provided for the use of an ADM only to amend a Traffic Document.

Res 866 - Definitions

64. AFTA does not object to this amendment.

Other Resolutions Applicable in Australia adopted by IATA's members at the May 2004 PAcnf

65. Reference is made to page 2 of IATA's application dated 23 December 2004 and Schedule 4 thereto. The Schedule sets out resolutions applicable to Australia and adopted by IATA's members at the PAcnf in May 2004 and by mail vote since the PAcnf in 2001. IATA submits that these resolutions are authorised by determination A907191.
66. Determination A907191 provided:
- “(2) subject to paragraph (3) below, authorisation is also given for IATA and its members to meet in IATA Passenger Agency Conferences and pass resolutions amending or modifying or adding to the current resolutions;
- (3) this authorisation does not extend to amendments of or substitutions for the resolutions specified in appendix B as they appeared in the IATA Passenger Agency Conference Resolutions Manual, 22nd Edition.”
67. Each of the resolutions referred to in Schedule 4 of the Application for Minor Variation do not form part of Appendix B to the determination. However AFTA submits that it was not the intention of the determination to provide IATA with a *carte blanche* to adopt resolutions which in AFTA's opinion have the potential to result in either a resolution in the extent to which the public may benefit or negatively impact on the agents' ability to remain in the PAP which would ultimately impact on the competition between airlines and/or agents. We set out those concerns as follows.

Res 890 – Card Sales Rules

68. This amendment has not been agreed by travel agents or the GCC. The amendment creates a situation where a travel agent cannot make a credit card transaction on a face to face basis unless a paper credit card charge form is completed and filed. This goes against the normal industry practice where the GDS automated system is used for verification and recording. The amendment to the resolution deletes this provision.

Conclusion

69. As can be seen from the above comments the amendments to the Schedule 4 resolutions considerably impact on the way agents conduct their business and in their relationship with IATA members. If IATA wishes to implement such amendments then those amendments should be subject to scrutiny by the Commission to ensure that the impact of such resolutions as amended do not have a competitive detriment or decrease the public benefit provided by the PAP.

Yours faithfully

A handwritten signature in black ink, appearing to read "Mike Hatton", with a long horizontal flourish extending to the right.

Mike Hatton
Chief Executive



IATA MEMBER AIRLINES APPOINTING AGENTS BY GENERAL CONCURRENCE

The following Member Airlines have deposited a statement of general concurrence with the Agency Administrator for the appointment of Accredited Agents in Area 3 in accordance with the provisions of Section 4 of the Passenger Sales Agency Rules-SWP.

In order to act as an appointed Agent for Member Airlines not listed below, an Agent must hold a valid Certificate of Appointment from the Member concerned.

APPOINTING MEMBERS (Two-letter code in brackets)	Note	APPOINTING MEMBERS (Two-letter code in brackets)	Note
AEROFLOT (SU)		EMIRATES (EK)	
AEROLINEAS ARGENTINAS (AR)		EL AL (LY)	
AEROMEXICO (AM)		ETHIOPIAN AIRLINES (ET)	
AIR CANADA (AC)	1	FINNAIR (AY)	
AIR CHINA INTERNATIONAL CORP. (CA)		GARUDA (GA)	
AIR FRANCE (AF)		GULF AIR (GF)	
AIR-INDIA (AI)		INDIAN AIRLINES (IC)	6
AIR KAZAKSTAN (9Y)		IRAN AIR (IR)	
AIR MALTA P.L.C. (KM)		JAPAN AIR SYSTEM (JD)	7
AIR NEW ZEALAND (NZ)		JAPAN AIRLINES (JL)	
AIR NIUGINI (PX)		KENYA AIRWAYS (KQ)	
AIR PACIFIC (FJ)	5	KLM (KL)	
AIR TAHITI (VT)		KOREAN AIR (KE)	10
AIR VANUATU (NF)		KUWAIT AIRWAYS (KU)	
ALL NIPPON AIRWAYS (NH)	8	LAN CHILE S.A. (LA)	
ALITALIA S.P.A. (AZ)		LOT (LO)	
AMERICAN AIRLINES (AA)		LTU (LT)	
AMERICA WEST AIRLINES (HP)		LUFTHANSA (LH)	
AVIANCA (AV)		MACEDONIAN AIRLINES — MAT (IN)	
BALKAN (LZ)		MALAYSIA AIRLINES (MH)	
BRITISH AIRWAYS (BA)		MEA (ME)	
CATHAY PACIFIC (CX)		NORTHWEST AIRLINES (NW)	
CUBANA (CU)		OLYMPIC AIRWAYS (OA)	
CHINA EASTERN (MU)		PAL (PR)	
CHINA NORTHERN AIRLINES (CJ)		PIA (PK)	9
CHINA SOUTHERN AIRLINES (CZ)		POLYNESIAN AIRLINES (PH)	
CHINA SOUTHWEST AIRLINES (SZ)		QANTAS (QF)	
CHINA YUNNAN AIRLINES (3Q)		QATAR AIRWAYS (QR)	
CHINA XINJIANG AIRLINES (XO)		ROYAL BRUNEI (BI)	
CONTINENTAL AIRLINES (CO)		ROYAL JORDANIAN (RJ)	
CZECH AIRLINES (OK)		ROYAL TONGAN AIRLINES (WR)	
DELTA AIR LINES (DL)		SAA (SA)	
DRAGONAIR (KA)		SAS (SK)	
EGYPTAIR (MS)		SAUDI ARABIAN AIRLINES (SV)	3



APPOINTING MEMBERS

(Two-letter code in brackets) **Note**

SHANGHAI AIRLINES (FM)

SIA (SQ)

SOLOMON AIRLINES (IE)

SRILANKAN (UL)

SYRIANAIR (RB)

TAP (TP)

THAI AIRWAYS (TG)

4

THY (TK)

UNITED AIRLINES (UA)

VARIG S.A. (RG)

XIAMEN AIRLINES (MF)

- Note 1 Limited to Bangladesh, India, Nepal, Pakistan and Sri Lanka only
- Note 2 Intentionally left blank
- Note 3 Except Chinese Taipei, Democratic People's Republic of Korea and Russian Federation
- Note 4 Except Macao (SAR), China
- Note 5 Except US Possessions and Territories within Area 3
- Note 6 Limited to Pakistan only
- Note 7 Limited to Hong Kong (SAR), China, Japan, Republic of Korea and People's Republic of China
- Note 8 Limited to Australia, Hong Kong (SAR), China, Republic of Korea, Malaysia, New Zealand, Singapore, Chinese Taipei and Thailand
- Note 9 Except India
- Note 10 Limited to Indonesia, Japan, Korea and Thailand