

ACCC Questions for Qantas & Air New Zealand – Tasman Networks Agreement

Question 11

[RESTRICTION OF PUBLICATION CLAIMED]

The Applicants have received clarification from the Commission regarding this question and understand that the Commission is seeking to test whether it is possible and practical for passengers who wish to fly across the Tasman to use an indirect route (ie. fly with one airline across the Tasman and then connect to another airline on a New Zealand domestic sector).

This response has been prepared by the Applicants.

General

The Applicants do not submit (nor do we believe that the data would show) that, in many cases, it is practical for passengers to fly with one airline across the Tasman and then with another (either Air NZ, Qantas or Origin Pacific) on a domestic New Zealand sector (for example: fly Emirates on the Sydney - Auckland sector and then Air NZ on the Auckland – Wellington sector). For the reasons discussed below, itineraries consisting of two separate sectors with two different carriers are not an attractive alternative for many passengers on the Tasman.

Rather, the Applicants submit that independently they provide attractive indirect and connecting route options between city pairs due to their respective practices of common rating. This practice would continue under the TNA.

Competition is also provided by other carriers operating on indirect routes. For example, Virgin Blue markets flights Sydney - Wellington (via Brisbane) at prices comparable to those of the Applicants. By way of illustration, attached at **Annexure A** are screen prints from webjet.com.au, a travel agent website, which show fares available between Sydney and Wellington.

Common rating

The Applicants treat the Tasman as a single market. Independently, both Air NZ and Qantas generally:

- 1 common rate the different main Tasman city pair routes; and
- 2 common rate indirect routes with the main direct routes.

Air NZ Response

- Air NZ generally common rates the various New Zealand city pairs. For example:

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- AKL – SYD;
 - CHC – SYD; and
 - WLG – SYD.
- Air NZ generally common rates direct and indirect routes. For example:
- WLG – SYD (direct); and
 - WLG – SYD (via AKL).

With the exception of special discounts and short-term promotions, Air NZ generally common rates flights at the point of sale. Attached at **Annexure B** are screen prints from Air NZ's bookings website. They show identical fares within fare category for each city pair and for direct and indirect routes.

Qantas Response

With the exception of special discounts and short term promotions, Qantas common rates flights on the Tasman at the point of sale in a number of ways.

Point of Sale - Australia

- [RESTRICTION OF PUBLICATION CLAIMED]
 - Attached in **Annexure C** are screen prints from Qantas' Australian bookings website (prices are in Australian dollars).
- [RESTRICTION OF PUBLICATION CLAIMED]

Point of Sale – New Zealand

- [RESTRICTION OF PUBLICATION CLAIMED]
 - Attached in **Annexure C** are screen prints from Qantas' NZ bookings website (prices are in NZ dollars).
- [RESTRICTION OF PUBLICATION CLAIMED]

Average revenue per seat sold

The average revenue per seat sold data, which was provided by the Applicants in their response to Question 10, dated 20 June 2006, shows that common rating also flows through to average revenue on different routes.

Air NZ

Attached in **Confidential Annexure D** are graphs prepared using the data provided by Air NZ in response to Question 10. These graphs demonstrate the effect that Air NZ's practice of common rating has on the average revenue per seat sold. These are provided on a spot month to month basis and on a moving annual total basis as indicated.

Qantas

Attached in **Confidential Annexure E** are graphs prepared using the data provided by Qantas in response to Question 10. These graphs demonstrate the effect that Qantas' practice of common rating has on the average revenue per seat sold on direct routes. These are provided on a spot month to month basis.

Indirect flights with different carriers

Itineraries consisting of two separate sectors with two different carriers (for example, flying the Sydney – Auckland sector on Emirates and the Auckland – Wellington sector on Air NZ, or flying the Wellington – Brisbane sector on Virgin Blue and the AKL – SYD sector on Qantas) are not a particularly attractive alternative for many passengers on the Tasman. The reasons for this include:

- It is often easier to book two flights on the same carrier, rather than with different carriers. The ability to combine fares from different carriers is not generally available from one website (although travel agents' websites are

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rapidly becoming more able to do this – see for example, www.orbitz.com). Therefore, to book the flights a passenger would need to book with each carrier separately or via a travel agent.

- It is likely to be more expensive for a passenger to fly with two different carriers.
- Combining flights on two separate carriers into one itinerary results in an inferior product in terms of service. In the absence of some form of special co-operation agreement (like the Restated Joint Services Agreement between Qantas and British Airways), the flights do not combine well due to the inconveniences caused by flight transfers and connection times.

Annexure A

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Seats are available now!
Select from the airlines displayed below...

From: **Sydney** To: **Wellington International** Type: **Return**
Wednesday 09 Aug 2006 Class: **Economy**

Fares are per person in Australian dollars, incl. GST and airline surcharges & Government taxes. The Virgin Blue and Jetstar \$2 per passenger per flight credit card surcharge will display during the booking process. A \$3.00 per person per sector Seat Price Guarantee and a \$14.05 processing fee applies per booking.

Note: return flight pricing has been converted from NZD\$ to AUD\$ at today's exchange rate. Variations to your final price may occur due to currency fluctuations. Your credit card company may charge a conversion fee.

Departing Flights Previous City Wed 09 Aug 2006

Flight Details	Pacific Blue Blue Saver	Air New Zealand smart saver	Qantas Airways Red - e Deal (I)	Qantas Airways Red - e Deal (I)	Air New Zealand flexi saver	Qantas Airways Super Saver (I)	Pacific Blue Flexi Saver	Pacific Blue Fully Flexible	Pacific Blue Corporate Plus	Air New Zealand flexi	Qantas / Fully Flexi
From	\$315.00	\$335.00	\$338.04	\$360.04	\$418.06	\$413.84	\$465.00	\$475.00	\$495.00	\$678.06	\$681
Depart: Arrive	Click on the fare to select your flight.										
NZ700 07:00am 02:30pm					\$365.00					\$678.06	
QF183 07:15am 04:00pm			\$372.72	\$384.72	\$447.72						\$715
QF47 09:10am 02:30pm			\$381.04	\$380.04	\$412.04						\$681

Annexure B – Air NZ

Ex Wellington

Wellington to Sydney
Tuesday 21 Nov 2006

Economy From NZD \$279.00*
Premium Economy No seats available
Business From NZD \$664.00*

Sort by: **Lowest Price** 8 options found

DEPARTS	ARRIVES	FLIGHT INFO	DURATION	TASMAN SMART SAVER	TASMAN FLEXI SAVER	TASMAN FLEXI
8:20am Tue 21st Wellington	8:20am Tue 21st Sydney	NZ0211	3h47m	Adult \$279.00*	Adult \$367.00*	Adult \$664.00*
11:00am Tue 21st Wellington	12:00pm Tue 21st Auckland	NZ0426	1h30m	Adult \$279.00*	Adult \$367.00*	Adult \$664.00*
1:00pm Tue 21st Auckland	2:00pm Tue 21st Sydney	NZ0718	1h30m	Adult \$279.00*	Adult \$367.00*	Adult \$664.00*
10:00am Tue 21st Wellington	2:00pm Tue 21st Auckland	NZ0458	1h30m	Adult \$279.00*	Adult \$367.00*	Adult \$664.00*
3:00pm Tue 21st Auckland	5:00pm Tue 21st Sydney	NZ0708	1h30m	Adult \$279.00*	Adult \$367.00*	Adult \$664.00*

1 Adult Fare(s) NZD \$664.00*

Wellington to Sydney
Tuesday 21 Nov 2006

Economy From NZD \$279.00*
Premium Economy No seats available
Business From NZD \$664.00*

Sort by: **Lowest Price** 8 options found

DEPARTS	ARRIVES	FLIGHT INFO	DURATION	TASMAN SMART SAVER	TASMAN FLEXI SAVER	TASMAN FLEXI
10:00pm Tue 21st Wellington	2:00pm Tue 21st Auckland	NZ0426	1h30m	Adult \$279.00*	Adult \$367.00*	Adult \$664.00*
3:00pm Tue 21st Auckland	5:00pm Tue 21st Sydney	NZ0708	1h30m	Adult \$279.00*	Adult \$367.00*	Adult \$664.00*
1:15pm Tue 21st Wellington	2:00pm Tue 21st Christchurch	NZ0427	1h15m	Adult \$279.00*	Adult \$367.00*	Adult \$664.00*
4:00pm Tue 21st Christchurch	5:30pm Tue 21st Sydney	NZ0783	1h15m	Adult \$279.00*	Adult \$367.00*	Adult \$664.00*
3:00pm Tue 21st Wellington	4:00pm Tue 21st Auckland	NZ0446	1h30m	Adult \$279.00*	Adult \$367.00*	Adult \$664.00*

1 Adult Fare(s) NZD \$664.00*

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Ex Christchurch

Air New Zealand Bookings - Create Itinerary - Microsoft Internet Explorer provided by Air New Zealand Ltd.

Address: https://flightbookings.airnewzealand.co.nz/book_en_NZ/bookSearchForFlights.do

AIR NEW ZEALAND
Don't think twice about it.

FLIGHT BOOKINGS

1. SEARCH 2. CREATE ITINERARY 3. TRAVELLER DETAILS 4. PURCHASE TICKETS 5. BOOKING CONFIRMATION

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Christchurch to Sydney
Tuesday 21 Nov 2006

Economy From NZD \$279.00* Premium Economy No seats available Business From NZD \$633.00*

Sort by: **Lowest Price** 8 options found

DEPARTS	ARRIVES	FLIGHT INFO	DURATION	CASUAL SMART SAVER	INTL	TASMAN FLEXI SAVER	INTL	TASMAN FLEXI	INTL
5:54am Tue 21st Christchurch	7:10am Tue 21st Auckland	NZ6500		Adult \$279.00*		Adult \$367.00*		Adult \$664.00*	
9:08am Tue 21st Auckland	10:08am Tue 21st Sydney	NZ6103	6h40m						
7:00am Tue 21st Christchurch	9:30am Tue 21st Sydney	NZ6781	2h30m	Adult \$279.00*		Adult \$367.00*		Adult \$664.00*	
10:00am Tue 21st Christchurch	11:50am Tue 21st Auckland	NZ6522		Adult \$279.00*		Adult \$367.00*		Adult \$664.00*	
1:00pm Tue 21st Auckland	2:30pm Tue 21st Sydney	NZ6719	2h00m						

Previous Day Next Day

* Fares exclude applicable airport & government costs, which are shown separately on this page. Additional costs cannot be paid.

1 Adult Fare(s) NZD \$279.00*

Air New Zealand Bookings - Create Itinerary - Microsoft Internet Explorer provided by Air New Zealand Ltd.

Address: https://flightbookings.airnewzealand.co.nz/book_en_NZ/bookSearchForFlights.do

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FLIGHT BOOKINGS

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Password

LOG IN

Christchurch to Sydney
Tuesday 21 Nov 2006

Economy From NZD \$279.00* Premium Economy No seats available Business From NZD \$633.00*

Sort by: **Lowest Price** 8 options found

DEPARTS	ARRIVES	FLIGHT INFO	DURATION	CASUAL SMART SAVER	INTL	TASMAN FLEXI SAVER	INTL	TASMAN FLEXI	INTL
4:00pm Tue 21st Christchurch	6:30pm Tue 21st Sydney	NZ6500	2h30m	Adult \$279.00*		Adult \$367.00*		Adult \$664.00*	
7:00pm Tue 21st Christchurch	9:10pm Tue 21st Wellington	NZ6956		Adult \$279.00*		Adult \$367.00*		Adult \$664.00*	
8:40am Wed 22nd Wellington	8:20am Wed 22nd Sydney	NZ6741	14h00m						
8:45pm Tue 21st Christchurch	10:05pm Tue 21st Auckland	NZ6302		Adult \$279.00*		Adult \$367.00*		Adult \$664.00*	
7:06am Wed 22nd Auckland	8:30am Wed 22nd Sydney	NZ6701	13h45m						

Previous Day Next Day

* Fares exclude applicable airport & government costs, which are shown separately on this page. Additional costs cannot be paid.

1 Adult Fare(s) NZD \$279.00*

Freehills

Ex Auckland

Air New Zealand Bookings - Create Itinerary - Microsoft Internet Explorer provided by Air New Zealand Ltd

Address: https://flightbookings.airnewzealand.co.nz/book_en_NZ/booksearch/flights.do

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FLIGHT BOOKINGS

1 SEARCH 2 CREATE ITINERARY 3 TRAVELLER DETAILS 4 PURCHASE TICKETS 5 BOOKING CONFIRMATION

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Username or Apparis no.

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LOGIN

Auckland to Sydney
Tuesday 21 Nov 2006

Economy From NZD \$279.00* Premium Economy No seats available Business From NZD \$664.00*

Sort by Lowest Price 5 options found

DEPARTS	ARRIVES	FLIGHT	TASKAN	FLYING	INFO	TASKAN	INFO
			CLASS	FARE	CLASS	FARE	CLASS
7:00am Tue 21st Auckland	8:30am Tue 21st Sydney	NZ201	3h 30m	Adult \$279.00*	Adult \$367.00*	Adult \$664.00*	
9:00am Tue 21st Auckland	18:30am Tue 21st Sydney	NZ210	3h 30m	Adult \$279.00*	Adult \$367.00*	Adult \$664.00*	
1:00pm Tue 21st Auckland	2:30pm Tue 21st Sydney	NZ271	3h 30m	Adult \$279.00*	Adult \$367.00*	Adult \$664.00*	
4:00pm Tue 21st Auckland	6:00pm Tue 21st Sydney	NZ272	3h 30m	Adult \$279.00*	Adult \$367.00*	Adult \$664.00*	

Previous Day Next Day

*Fares exclude applicable airport & government costs, which are shown separately on this page. Additional costs cannot be paid.

1 Adult Fare(s) NZD \$279.00*

Done

Start 3 Micro 4 Micro 30 BM NZ A/C TE Credits Internal 2 Title Documents 98% 12:21 p.m.

Annexure C – Qantas

Screen 1: Sydney – Auckland

Flight availability - Microsoft Internet Explorer

Address: http://book.qantas.com.au/pl/QInternational/en/Flex/PriceAvailabilityServlet?SITE=QF&PRICING_TYPE=C&DATE_RANGE_QUALIFIER_1=C&DATE_RANGE_VALUE_1=08

QANTAS Flights

1. Search 2. Select 3. Review 4. Passengers 5. Purchase 6. Confirmation

Note: Price is for 1 adult and includes charges and taxes. Total price for all passengers will be shown on the next page. Credit card payments attract a fee of A\$4.40 per passenger per booking.

Flights Out: Sydney to Auckland - Tue 21 Nov 06

From	To	Flight	Duration	Red e-Deal	Super Saver	Business
07:25 Sydney	12:25 Auckland	QF153	3h 00m	\$335	\$410	\$678
10:45 Sydney	16:00 Auckland	QF351	3h 15m	\$335	\$410	\$678
11:40 Sydney	16:40 Auckland	QF43	3h 00m	\$335	\$410	\$678
16:30 Sydney	21:30 Auckland	QF389	3h 00m	\$335	\$410	\$678
18:50 Sydney	23:50 Auckland	QF49	3h 00m	\$335	\$410	\$678
06:05 Sydney	06:35 Brisbane	QF500	7h 05m	\$490	\$607	\$934
09:00 Brisbane	15:10 Auckland	QF115	7h 05m	\$822	\$864	\$934
06:05 Sydney	06:35 Brisbane	QF500	7h 05m	\$490	\$607	\$934
09:00 Brisbane	15:10 Auckland	QF9307	7h 05m	\$822	\$864	\$934
06:35 Sydney	07:05 Brisbane	QF502	6h 35m	\$490	\$607	\$934
09:00 Brisbane	15:10 Auckland	QF115	6h 35m	\$822	\$864	\$934
06:35 Sydney	07:05 Brisbane	QF502	6h 35m	\$490	\$607	\$934
09:00 Brisbane	15:10 Auckland	QF9307	6h 35m	\$822	\$864	\$934

Screen 2: Sydney – Wellington

Flight availability - Microsoft Internet Explorer

Address: http://book.qantas.com.au/pl/QInternational/en/Flex/PriceAvailabilityServlet?SITE=QF&PRICING_TYPE=C&DATE_RANGE_QUALIFIER_1=C&DATE_RANGE_VALUE_1=08

QANTAS Flights

1. Search 2. Select 3. Review 4. Passengers 5. Purchase 6. Confirmation

Note: Price is for 1 adult and includes charges and taxes. Total price for all passengers will be shown on the next page. Credit card payments attract a fee of A\$4.40 per passenger per booking.

Flights Out: Sydney to Wellington - Tue 21 Nov 06

From	To	Flight	Duration	Red e-Deal	Super Saver	Business
09:00 Sydney	14:10 Wellington	QF47	3h 10m	\$335	\$410	\$678
18:25 Sydney	23:35 Wellington	QF117	3h 10m	\$335	\$410	\$678
06:00 Sydney	07:30 Melbourne	QF401	6h 45m	\$481	\$598	\$938
09:15 Melbourne	14:45 Wellington	QF37	6h 15m	\$481	\$598	\$938
06:30 Sydney	08:00 Melbourne	QF405	6h 15m	\$481	\$598	\$938
09:15 Melbourne	14:45 Wellington	QF37	6h 15m	\$481	\$598	\$938
07:25 Sydney	12:25 Auckland	QF163	6h 35m	\$487	\$641	\$712
15:00 Auckland	16:00 Wellington	QF409	8h 05m	\$487	\$641	\$712
07:25 Sydney	12:25 Auckland	QF163	8h 05m	\$487	\$641	\$712
16:30 Auckland	17:30 Wellington	QF409	9h 35m	\$487	\$641	\$712
07:25 Sydney	12:25 Auckland	QF163	9h 35m	\$487	\$641	\$712
18:00 Auckland	19:00 Wellington	QF409				
09:25 Sydney	14:20 Christchurch	QF45				

Screen 3: Sydney – Christchurch

QANTAS Flights

1. Search 2. Select 3. Review 4. Passengers 5. Purchase 6. Confirmation

Note: Price is for 1 adult and includes charges and taxes. Total price for all passengers will be shown on the next page. Credit card payments attract a fee of A\$4.40 per passenger per booking.

Flights Out: Sydney to Christchurch - Tue 21 Nov 06

From	To	Flight	Duration	Basic	Super Saver	Business	First Class
09:25 Sydney	14:20 Christchurch	QF45	2h 55m	No seats	\$410	\$678	\$1157
09:25 Sydney	14:20 Christchurch	QF9339	2h 55m	No seats	\$678	\$1157	
07:25 Sydney	12:25 Auckland	QF163	5h 55m	No seats	\$444	\$712	\$1191
14:00 Auckland	15:20 Christchurch	QF133					
07:25 Sydney	12:25 Auckland	QF163	5h 55m	No seats	\$712	\$1191	
14:00 Auckland	15:20 Christchurch	QF9341	5h 55m	No seats	\$712	\$1191	
07:25 Sydney	12:25 Auckland	QF163	7h 55m	No seats	\$444	\$712	\$1191
16:00 Auckland	17:20 Christchurch	QF147					
07:25 Sydney	12:25 Auckland	QF163	9h 55m	No seats	\$444	\$712	\$1191
18:00 Auckland	19:20 Christchurch	QF153					
07:25 Sydney	12:25 Auckland	QF163	12h 15m	No seats	\$444	\$712	\$1191
20:20 Auckland	21:40 Christchurch	QF161					
09:00 Sydney	14:10 Wellington	QF82					

Screen 4: Auckland – Sydney

QANTAS Flights

1. Search 2. Select 3. Review 4. Passengers 5. Purchase 6. Confirmation

Note: Price is for 1 adult and includes charges and taxes. Total price for all passengers will be shown on the next page.

Flights Out: Auckland to Sydney - Tue 21 Nov 06

From	To	Flight	Duration	Basic	Super Saver	Business	First Class
05:45 Auckland	07:20 Sydney	QF322	3h 35m	\$238	\$409	\$704	\$1204
06:30 Auckland	07:55 Sydney	QF40	3h 25m	\$238	\$409	\$704	\$1204
09:00 Auckland	10:25 Sydney	QF164	3h 25m	\$238	\$409	\$704	\$1204
13:50 Auckland	15:10 Sydney	QF190	3h 20m	\$324	\$409	\$704	\$1204
18:30 Auckland	19:55 Sydney	QF44	3h 25m	\$238	\$409	\$704	\$1204
07:10 Auckland	07:40 Brisbane	QF116	6h 35m	\$418	\$639	\$998	\$1886
09:15 Brisbane	11:45 Sydney	QF17					
07:10 Auckland	07:40 Brisbane	QF116	6h 35m	\$432	\$653	\$1012	\$1900
09:15 Brisbane	11:45 Sydney	QF176					
07:10 Auckland	07:40 Brisbane	QF116	7h 35m	\$418	\$639	\$998	\$1886
10:15 Brisbane	12:45 Sydney	QF521					
07:20 Auckland	07:45 Brisbane	QF538	6h 25m	\$865	\$915	\$998	\$1886
09:15 Brisbane	11:45 Sydney	QF17					
07:20 Auckland	07:45 Brisbane	QF538	6h 25m	\$879	\$929	\$1012	\$1900

Screen 5: Wellington – Sydney

QANTAS Flights

1. Search 2. Select 3. Review 4. Passengers 5. Purchase 6. Confirmation

Note: Price is for 1 adult and includes charges and taxes. Total price for all passengers will be shown on the next page.

Change dates

Flights Out: Wellington to Sydney - Tue 21 Nov 06

From	To	Flight	Duration	Economy	Super Saver	Business
06:00 Wellington	07:40 Sydney	QF118	3h 40m	\$238	\$409	\$1204
15:05 Wellington	16:45 Sydney	QF48	3h 40m	\$345	\$409	\$1361
06:05 Wellington	08:10 Melbourne	QF38	7h 15m	\$406	\$628	\$1818
10:00 Melbourne	11:20 Sydney	QF432	7h 15m			
06:05 Wellington	08:10 Melbourne	QF38	7h 45m	\$406	\$628	\$1818
10:30 Melbourne	11:50 Sydney	QF426	7h 45m			
06:05 Wellington	08:10 Melbourne	QF38	8h 15m	\$406	\$628	\$1818
11:00 Melbourne	12:20 Sydney	QF426	8h 15m			
06:05 Wellington	08:10 Melbourne	QF38	9h 45m	\$406	\$628	\$1818
11:30 Melbourne	12:50 Sydney	QF428	9h 45m			
06:05 Wellington	08:10 Melbourne	QF38	9h 15m	\$406	\$628	\$1818
12:00 Melbourne	13:20 Sydney	QF430	9h 15m			
06:05 Wellington	08:10 Melbourne	QF38	9h 45m	\$406	\$628	\$1818
12:30 Melbourne	13:50 Sydney	QF432	9h 45m			

Screen 6: Christchurch – Sydney

QANTAS Flights

1. Search 2. Select 3. Review 4. Passengers 5. Purchase 6. Confirmation

Note: Price is for 1 adult and includes charges and taxes. Total price for all passengers will be shown on the next page.

Change dates

Flights Out: Christchurch to Sydney - Tue 21 Nov 06

From	To	Flight	Duration	Economy	Super Saver	Business
15:05 Christchurch	16:30 Sydney	QF312	3h 25m	\$324	\$409	\$704
15:30 Christchurch	16:50 Sydney	QF326	3h 20m	No seats	No seats	\$704
15:35 Christchurch	16:50 Sydney	QF46	3h 15m	\$345	\$409	\$1204
06:30 Christchurch	07:50 Auckland	QF194	10h 40m	No seats	\$448	\$743
13:50 Auckland	15:10 Sydney	QF199	10h 10m	No seats	\$448	\$743
07:00 Christchurch	09:15 Auckland	QF172	10h 10m	No seats	\$448	\$743
13:50 Auckland	15:10 Sydney	QF199	1 stop	No seats	\$448	\$743
07:00 Christchurch	07:45 Wellington	QF172	11h 45m	No seats	\$448	\$743
15:05 Wellington	16:45 Sydney	QF48	11h 45m	No seats	\$448	\$1400
09:45 Christchurch	11:05 Auckland	QF412	7h 25m	No seats	\$448	\$743
13:50 Auckland	15:10 Sydney	QF199	7h 25m	No seats	\$448	\$743
09:45 Christchurch	11:05 Auckland	QF342	7h 25m	No seats	\$448	\$743
13:50 Auckland	15:10 Sydney	QF199	7h 25m	No seats	\$448	\$743

Confidential Annexure D – Air NZ

[RESTRICTION OF PUBLICATION CLAIMED]

Confidential Annexure E – Qantas

[RESTRICTION OF PUBLICATION CLAIMED]