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GILBERT + TOBIN

LAWYERS

28 September 2011

By email

Richard Chadwick
General Manager, Adjudication
Australian Competition and Consumer Commission
23 Marcus Clarke Street
Canberra ACT 2601

Copies to:
Darrell Channing, Clare McGinness, Imogen Hartcher-O'Brien

Public register version

Dear Dr Chadwick

Virgin Australia and Singapore Airlines – Applications for Authorisation of Alliance

We refer to our phone call with Imogen Hartcher-O'Brien's on 23 September 2011. Enclosed is our response to her request for further information regarding:

· The destinations available under the proposed Alliance which are not served by Virgin Australia through its existing alliances; and

· Examples of new origin and destinations that would be able to be offered by Virgin Australia under the Alliance, including examples from a regional destination in Australia to an international destination.

Please contact us if you would like to discuss this letter or require further information from the Applicants.

Yours faithfully

Gilbert + Tobin

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Potential new destinations and routings offered on a Virgin Australia code under the Alliance

The table below lists the 46 international destinations currently served by Singapore Airlines or Silk Air that are not also serviced by Virgin Australia or its existing alliance partners. Subject to regulatory rights, under the Alliance, Virgin Australia will have the ability to offer coded services to these destinations.

Note: A 'Y' in the column 'Third country codeshare right' indicates that both Singapore Airlines and Virgin Australia currently have third country codeshare rights for that destination and therefore may codeshare immediately to those destinations, subject to commercial agreement. An 'N' indicates that one or both do not have the requisite rights to codeshare to those destinations. Codeshare on the routes indicated with an "N" is subject to the ability for the parties to gain the requisite rights.

Country	Point	Third country codeshare right
Asia		
China	Chengdu (CTU)	Y
	Chongqing (CKG)	Y
	Guangzhou (CAN)	Y
	Kunming (KMG)	Y
	Shenzhen (SZX)	Y
	Xiamen (XMN)	Y
	Shanghai (SHA)	Y
Japan	Fukuoka (FUK)	Y
	Osaka (OSA)	Y
Malaysia	Kota Kinabalu (BKI)	Y
	Kuching (KCH)	Y
	Langkawi (LGK)	Y
	Penang (PEN)	Y
Thailand	Chiang Mai (CNZ)	Y
Vietnam	Da Nang (DAD)	Y
	Hanoi (HAN)	Y
	Ho Chi Minh (SGN)	Y
Hong Kong	Hong Kong (HKG)	Y
Cambodia	Phnom Penh (PNH)	N
	Siem Reap (REP)	N
Indonesia	Balikpapan (BPN)	Y
	Lombok (AMI)	Y
	Manado (MDC)	Y
	Medan (MES)	Y

Country	Point	Third country codeshare right
	Palembang (PLM)	Y
	Medan (MES)	Y
	Pekanbaru (PKU)	Y
	Solo (SOC)	Y
	Surabaya (SUB)	Y
Burma	Yangon (RGN)	N
Philippines	Cebu (CEB)	N
	Davao (DVO)	N
Brunei	Bandar Seri Begawan (BWN)	Y
Taipei	Taiwan (TPE)	Y
Subcontinent		
India	Ahmedabad (AMD)	N
	Coimbatore (CJB)	N
	Kochi (COK)	N
	Kolkata (CCU)	Y
	Thiruvananthapuram (TRV)	N
Europe		
Denmark	Copenhagen (CPH)	Y
Italy	Rome (ROM)	N
Netherlands	Amsterdam (AMS)	Y
Spain	Barcelona (BCN)	Y
Switzerland	Zurich (ZRH)	Y
United Kingdom	London (LHR)*	Y
Middle East		
UAE	Dubai (DXB)	Y
South America		
Brazil	Sao Paulo (SAO)	Y

* From Perth only

In addition, Virgin Australia intends to codeshare on a number of Singapore Airlines' services to destinations in India, China, Japan and Africa. While Etihad does fly to these destinations, Virgin Australia does not code on Etihad to these destinations. These destinations include:

· Shanghai, China (PVG)

· Beijing, China (PEK)

· Nagoya, Japan (NGO)

· Tokyo, Japan (NRT)

- Johannesburg, South Africa (JNB)

- Cape Town, South Africa (CPT)

- Bangalore, India (BLR)

- Chennai, India (MAA)

- Delhi, India (DEL)

- Hyderabad, India (HYD)

- Mumbai, India (BOM).

Virgin Australia will also offer services from Perth to London via Singapore under the proposed Alliance as Etihad does not offer services from Perth.

The Alliance will enable Virgin Australia to offer connections from anywhere within its domestic network to any codeshare destination available with Singapore Airlines, opening up many new routings, including from regional Australia to destinations throughout the world.

Set out below are a number of examples of new Virgin Australia coded connecting routes that will be facilitated by the Alliance.

Canberra-Zurich

Code	Origin	Destination	Departure Time	Arrrival Time	Operational days
Fly out					
DJ	CBR	SYD	1230	1320	12345.7
SQ	SYD	SIN	1615	2120	1234567
SQ	SIN	ZRH	0125	0740	1234567
Fly in					
SQ	ZRH	SIN	1045	0605	1234567
SQ	SIN	SYD	0705	1800	1234567
DJ	SYD	CBR	2005	2100	12345.7

Port Hedland-Copenhagen

Code	Origin	Destination	Departure Time	Arrrival Time	Operational days
Fly out					
DJ	PHE	PER	0835	1035	123456
SQ	PER	SIN	1555	2110	1234567
SQ	SIN	CPH	0105	0715	.2.4.6.
Fly in					
SQ	CPH	SIN	1115	0615	.2.4.6.
SQ	SIN	PER	0755	1315	12...6.
DJ	PER	PHE	1515	1720	12345.7

Perth-Amsterdam

Code	Origin	Destination	Departure Time	Arrrival Time	Operational days
Fly out					
SQ	PER	SIN	1735	2250	12...6.
SQ	SIN	AMS	2350	0640	1234567
Fly in					
SQ	AMS	SIN	1030	0555	1234567
SQ	SIN	PER	0755	1315	12...6.

Canberra-Zurich

Code	Origin	Destination	Departure Time	Arrrival Time	Operational days
Fly out					
DJ	CBR	SYD	1230	1320	12345.7
SQ	SYD	SIN	1615	2120	1234567
SQ	SIN	ZRH	0125	0740	1234567
Fly in					
SQ	ZRH	SIN	1045	0605	1234567
SQ	SIN	SYD	0705	1800	1234567
DJ	SYD	CBR	2005	2100	12345.7

Melbourne – Barcelona

Code	Origin	Destination	Departure Time	Arrrival Time	Operational days
Fly out					
SQ	MEL	SIN	1645	2120	1234567
SQ	SIN	BCN	2340	0700	..3.5.7
Fly in					
SQ	BCN	SIN	1730	1310	.2..5.7
SQ	SIN	MEL	2115	0750	1234567

Canberra-Delhi

Code	Origin	Destination	Departure Time	Arrrival Time	Operational days
Fly out					
DJ	CBR	SYD	1530	1620	1234567
SQ	SYD	SIN	1910	0015	1234567
SQ	SIN	DEL	0230	0545	123....
Fly in					

Code	Origin	Destination	Departure Time	Arrrival Time	Operational days
SQ	DEL	SIN	0800	1610	123....
SQ	SIN	SYD	2035	0740	1234567
DJ	SYD	CBR	1105	1200	1234567

Hobart – Shanghai

Code	Origin	Destination	Departure Time	Arrrival Time	Operational days
Fly out					
DJ	HBA	MEL	2145	2300	...45.7
SQ	MEL	SIN	0105	0540	1234567
SQ	SIN	PVG	0730	1245	1234567
Fly in					
SQ	PVG	SIN	1350	1930	1234567
SQ	SIN	MEL	2115	0750	1234567
DJ	MEL	HBA	1135	1250	1234567

Newman-Tokyo

Code	Origin	Destination	Departure Time	Arrrival Time	Operational days
Fly out					
DJ	ZNE	PER	0835	1015	1.345..
SQ	PER	SIN	1555	2110	1234567
SQ	SIN	NGO	0105	0825	1234567
Fly in					
SQ	NGO	SIN	1030	1645	1234567
SQ	SIN	PER	1935	0055	1234567
DJ	PER	ZNE	0620	0800	1.345..

Karratha – Johannesburg

Code	Origin	Destination	Departure Time	Arrrival Time	Operational days
Fly out					
DJ	KTA	PER	0915	1110	123456.
SQ	PER	SIN	1555	2110	1234567
SQ	SIN	JNB	0235	0710	1234567
Fly in					
SQ	JNB	SIN	1330	0600	1..4.6.
SQ	SIN	PER	0755	1315	12...6.
DJ	PER	KTA	1500	1700	12345.7