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Our ref: SGC02:0519828  
Your ref: 48725

8 June 2012

Dr Richard Chadwick  
General Manager, Adjudication Branch  
Australian Competition & Consumer Commission  
23 Marcus Clarke Street  
CANBERRA ACT 2601

cc:

Mark Basile  
Adjudication Branch  
Australian Competition & Consumer Commission  
Level 35, 360 Elizabeth Street  
MELBOURNE 3000  
By email [Mark.Basile@accc.gov.au](mailto:Mark.Basile@accc.gov.au)

Dear Dr Chadwick

**RE: ETIHAD AND AIR BERLIN APPLICATIONS FOR AUTHORISATION  
A91307 & A91308 - CLARIFICATION OF DIRECT ROUTES OVERLAP**

Thank you for your email dated 1 June 2012 requesting additional information on direct route-level overlaps.

In our submission dated 26 April 2012 we noted at paragraph 4.28.1 that there was minimal overlap between the Etihad and Air Berlin networks. This comment was made only in relation to network destinations, and not in relation to direct route-level overlaps. The network destination overlap referred to Bangkok and the Maldives, which Etihad serves directly from Abu Dhabi, and which Air Berlin previously served directly from Germany.

We understand from your information request that you are seeking information regarding direct route-level overlaps. Our client has provided us with the following information.

**Pre-Commercial Co-operation Agreement**

Prior to entering into the Commercial Co-operation Agreement, there was no direct route-level overlaps between Etihad and Air Berlin.

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## **Post- Commercial Co-operation Agreement**

Since entering into the Commercial Co-operation Agreement, Etihad and Air Berlin now both operate 7 services per week on the Abu Dhabi to Düsseldorf route. There are currently no other commercial passenger airlines operating on this route. However, Emirates also operate services between the UAE and Düsseldorf (14 services per week on the Dubai to Düsseldorf route). The combined double daily service offered by Etihad and Air Berlin on the Abu Dhabi to Düsseldorf route provides a platform to better compete with Emirates' double daily service, and maximises connections over Etihad and Air Berlin's respective hubs, providing both airlines' customers with greater choice and flexibility.

We consent to this letter being placed on the ACCC's public register.

Should you have any further questions, please feel free to contact me.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Stephen Corones'.

**Stephen Corones**

Consultant

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