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15 November 2024

Mr David Hatfield
Director Competition Exemptions – Mergers, Exemptions & Digital
Australian Competition & Consumer Commission (ACCC)
GPO Box 3131 Canberra, ACT 2601

By email: exemptions@accc.gov.au

Dear Mr Hatfield

Board of Airline Representatives of Australia Inc application for revocation of authorisation A91466 and substitution of authorisation AA1000682 – Interested party consultation

We refer to the above application by the Board of Airline Representatives of Australia Inc (**BARA**).

Virgin Australia supports BARA's request for a new authorisation to continue to undertake collective bargaining negotiations for essential aviation services on behalf of member airlines. Airport charges and other essential aviation service charges are a significant and growing cost for airlines, and more cost-effective outcomes directly contribute to our ability to provide competitive airfares to Australian consumers.

Under the terms of the existing authorisation, BARA has been able to coordinate and represent the collective view of member airlines and has facilitated a more collaborative interaction with suppliers. This has encouraged a more thorough exchange of information and improved infrastructure and service outcomes, benefiting all parties as a result.

Virgin Australia believes there are significant public benefits in granting the new authorisation for a period of 10 years. Please don't hesitate to contact us if you would like to discuss this matter further.

Yours sincerely,

A handwritten signature in black ink, appearing to read "SMS", written over a light blue horizontal line.

Susan Schneider
Chief Legal and Risk Officer