

13 August 2015

Mr. Carsten Spohr
Chairman and Chief Executive Officer
Lufthansa Group
Airportring
60546 Frankfurt

Dear Mr Spohr,

As major Lufthansa Group (LHG) customers, distributors and stakeholders from around the world, we the undersigned are writing to express our deep concern over your plan to impose a worldwide indirect fare increase through a 16 Euros surcharge for tickets purchased anywhere other than through your websites, service centers and airport ticket counters beginning on 1 September 2015.

In an apparent process of seeking to increase revenue, decrease comparison-shopping and diminish intra and inter distribution channel competition, your plan would of course not just shift the cost of distributing your products to consumers and the managed-travel community, but also create substantial new costs within the industry by effectively insisting on a direct-connect strategy for LHG's contracted customers. LHG is either profoundly unaware of the needs and complexities of serving the needs of the business traveler, or it has chosen to disregard those requirements altogether.

As the cheerleading by your airline competitors for your plan at the recent IATA gathering in Miami, FL implies, your competitors are poised to follow LHG. Consequently, corporate, university and government travel and sourcing managers, and the travel management companies (TMCs) that support them, may soon be forced to deal with hundreds of airlines' one-off direct-connects undermining our existing highly efficient corporate travel procurement processes by requiring us to create new infrastructure and workaround procedures. Moreover, you are forcing us into an expensive case-by-case analysis of which fare is more economical to purchase.

LHG is attempting to substitute its judgment for our clearly articulated preferences. Without any collaboration whatsoever, you are forcing a choice between highly inefficient processes for managed-travel programs, or paying significantly higher fares. This is a bad choice and we do not welcome your unilateral approach. Travel managers, in close collaboration with their TMCs and technology partners, have developed a professional and productive travel procurement environment that must not be weakened. Instead, we need to find ways to strengthen our preferred channel and, as such, urge you to reconsider your surcharge plan and forge distribution agreements that are equitable for all distribution system participants.

We have many additional concerns regarding your new plan's potential negative worldwide implications for the functioning of the competitive structure of the industry, the ability of TMCs/travel agencies to remain viable distribution-channel competitors to airlines and the accessibility of choice for consumers and managed-travel customers.

A high-level industry delegation will be sharing our concerns with competition authorities in Bonn, Brussels and Washington, DC. We would welcome an opportunity to meet with your senior management team, in advance of those meetings, to ensure that we completely understand your objectives and that you are fully cognizant of our apprehensions and needs.

We look forward to hearing of your interest in this matter.

Sincerely,

Business Travel Coalition
Air Passengers Association of India (India)
Association of Retail Travel Agents
Travelers United
Scottish Passenger Agents' Association (UK)
IATA Agents Association of India (India)
Association of Canadian Travel Agencies (Canada)
Association Flemish Travel Bureaus (Belgium)
Travel Agents Association of India (India)
Dubai Travel & Tour Agents Group (United Arab Emirates)
Organization for Security and Co-operation in Europe (Austria)
The European Bank for Reconstruction and Development (UK)
The Global Fund to Fight AIDS, Tuberculosis and Malaria (Switzerland)
asr. e.V. (Germany)
White Reizen (Belgium)
Nomad Travels (India)
NOVA Chemicals Corporation (Canada)
Matrix Travel Management (UK)
Beiersdorf AG (Germany)
QA Business Travel (UK)
TierOne Travel (Canada)
SPEEDWINGS TRAVEL & CARGO PVT. LTD. (India)
s.a.b Travel (Serbia)
Putnik Travel Group (Switzerland)
Pro Sky Group (Germany)
Fibula d.o.o. (Serbia)
Advanced Travel Partners (ATPI) (UK)
Inter IKEA Group (Luxembourg)
The Travel Company Edinburgh (UK)
THS Agency (Serbia)

Wotton Travel Ltd (UK)
Cresta World Travel (UK)
Mladost Turist (Serbia)
Petroleum Geo-Services (Norway)
BTA First Travel AG (Switzerland)
Odeon World Travel (Serbia)
ista International GmbH (Germany)
TJX Companies, Inc.
Hotelplan Suisse (Switzerland)
Royaltours (Serbia)
JDB Hotels
Kompas Tourism & Travel (Serbia)
TRAVELSTORE (Spain)
Endress+Hauser Management AG (Switzerland)
Jules Boutin Travel Bureau (UK)
BLUE MARINE TRAVEL (UK)
Travel Agency Prestige Plus Tours (Serbia)
UCB (Belgium)
Redfern (UK)
BTM4U (Germany)
ITP International Travel Partnership (UK)
Merit Travel Group Inc. (Canada)
Miross (Serbia)
VISA Tours & Travel (P) Ltd (India)
WD World Travel (Canada)
Sky Multicom d.o.o. (Serbia)
Corporate Travel Partners Limited (UK)
Eurojet d.o.o. (Serbia)
University of British Columbia (Canada)
Agency PLAVI PLAVI (Serbia)
Bridgewater State University
DHL
Gen Re
Aramco Services Company
National Oilwell Varco
National Instruments
Rich Products Corporation
Eaton
Cannon Design
Provisur Technologies, Inc.
Autodesk, Inc.
Xilinx
SYKES Enterprises
Chateau Publishing
Varain Medical
Freudenberg North America L.P.

Symantec Corporation
Hickory Global Partners, LLC
World Travel, Inc.
Travel and Transport, Inc.
Tower Travel Management
The Travel Team, Inc.
TravelStore
Uniglobe Accent Travel
Travel One, Inc.
Stephens Inc.
Hess Corporate Travel
Antietam Travel Service, Inc.
Geraci Travel
Traveline
Contract Travel
Kilauea Travel Group, Inc.
VEMSA/Egencia
ITM
Berger Travel Agency, Inc
Aalddin Travel
HNL Travel Associates
GalaxSea Cruises & Tours
UNIGLOBE Travel Partners LLC
Travel Quest
Colwick Travel
Sanditz Travel
Anthony Travel, Inc.
Sun Travel
Options Travel
AllStars Travel Group
Travel Leaders/Travelmore
Travel Experts, Inc.
Travel Centre
Hache Law
Up and Away American Express Travel
Changing Planes
S.R. Travel Service
GlobalPoint Travel Solutions
TravelHarbour
Sunflower Travel
Acendas
Hidden Treasure Tours
GTI Travel
Group Travel Partners
LXR Travel LLC
Lighthouse Consulting

Menno Travel
CI Azumano Business Travel
Table Mountain Travel Service, Inc.
TL Global Travel, Inc.
Autoliv Americas
Buon Viaggio Travel
Classic Travel and Tours
Airport Travel Agency, Inc.
Travel Management Partners, Inc.
Far Horizons Travel
Trips Away Travel
MSP Travel Group
Fox World Travel

Copies:

Margrethe Vestager, Competition Commissioner, European Commission

Andreas Mundt, President, Bundeskartellamt

William J. Baer, Assistant Attorney General, U.S. Department of Justice, Antitrust Division

Anthony Foxx, Secretary, U.S. Department of Transportation

Lufthansa Group Supervisory Board

COMMENTS ENCLOSED

<<MORE>>

Comments From Signatories To Lufthansa Group Letter

The following comments are from the worldwide signatories to the letter to the Lufthansa Group's executive staff and its Supervisory Board with copies to the leaders of the European Commission, the Bundeskartellamt, the U.S. Department of Justice and U.S. Department of Transportation.

The purpose of the comments is to provide the Lufthansa Group and government regulators with unfiltered and considered views of front-line industry participants, including corporate travel managers, regarding the group's plans to implement a surcharge for airline bookings outside the group's proprietary websites and facilities.

Comments are organized in five categories:

- I. General Observations
- II. Immediate Negative Implications
- III. Abuse Of Dominant Position
- IV. Setting A Dangerous Precedent
- V. Harming The Indirect Channel And Managed-Travel Programs

I. General Observations

- "This demonstrates a lack of understanding of impact to customers and TMC services."
- "Not sure why any company wants to risk their reputation, run off businesses who want to buy through 'normal channels' as well as risk costly litigation and/or lobbying for something this risky and that bears no resemblance to their costs."
- "It is a shame that this is happening. Not smart, and bad timing considering what happened earlier this year, too. This should definitely be re-thought, as in canceled!"
- "While I understand the drive for LH to reduce costs; they first need to address their compensation and benefits costs and workplace rules. Taking aim at their distribution (read sales) channels will cause higher costs, disruption, and other challenges with their customers."
- "Undoubtedly Lufthansa did not think through this policy. It's illogical to think that TMCs will book on the Lufthansa website."
- "This policy is anti-consumer, anti-agent and will ultimately end up being anti-Lufthansa if it goes into effect."

- “As if all of the fees that are already being charged aren't enough to increase the airlines' profits well beyond expectations...now Lufthansa has a new plan which is designed to restrict the flying public's ability to search and provide tickets for the lowest fares in one place! If you do utilize one of the GDSs or online sites to search for the very best fare, you will be charged if the itinerary contains any Lufthansa segments. Lufthansa must be the Guinea Pig for the IATA plan for NDC. Since IATA hit so much resistance before being able to launch their NDC Plan, Lufthansa will be testing the waters for all of the other airlines to see if it will actually work.”
- “This is simply a way to increase price and have it appear as something else.”
- “This proposal is anti-consumer, disruptive to established distribution channels and non-competitive.”
- “We feel that it is a badly considered move by Lufthansa which could have serious implications for their travel agency partners and the robust and established travel trade distribution systems which are currently in place.”
- “We see it as LH's attempt to recoup from corporate clients their distribution costs.”
- “Unnecessary, disruptive, inefficient and diverts attention from the rest of the LHG's many problems. It will add costs to the agency and customer with no benefit while removing shopping options.”
- “This is a slap in the face to all the travel management companies and travelers who have stuck by Lufthansa in good times in bad, especially the recent and ongoing strikes. This ill-conceived move shifts costs and gravely harms travel management companies' ability to manage their substantial Lufthansa volume in the GDSs, which is the best central place to do so.
- “Excessive.”
- “Bad for our industry.”
- “Extremely bad for our industry. Technically not viable. A step back to stone age.”
- “Just another effort to pass the cost of doing business onto the customer. For travel managers and the general public, pricing in the airline business is the most complex and convoluted pricing structure when it comes down to understanding purchasing decisions.”

- “I think it is a disgrace. Not only have they stopped paying airline commissions, but now want to charge (penalize) us for booking their travel.”
- “This is again a way to generate indirect revenue at the expense of travellers - like the fuel surcharge and credit card fee. Better off to have a realistic cost of the ticket than additional indirect costs.”
- “I don't know what LHG is thinking, but as a IATA travel agent my opinion is that this step will be amazingly stupid!”
- “Our disappointment of LHG’s new policy has been shared with members and expressed to national trade media. We are also working on actions available to us within our governmental frameworks and will keep our members apprised on actions and outcomes.”
- “This is a travesty. It must be stopped right away.”
- “This needs to be rescinded.”
- “It should be fought and not implemented.”

II. Immediate Negative Implications

- “Forced inefficiency or forced increased costs for TMCs. Pick your poison.”
- “Our main concern is the ability to track employee locations in case of a tragic situation. We use the data from the GDS to track this.”
- “This will push consumers directly to airline websites, which leads them to believe they are receiving the lowest pricing available when it actually is not, on that airline and/or others.”
- “This proposal, if implemented, will fragment the booking process and end up being costly to both our clients and to ourselves.”
- “Having differential pricing in different mediums of distribution by adding or asking for Euro 16, for now, leads to confusion and transparency in the eyes of a consumer having to run pillar to post merely to ascertain the most economical official price.”
- “With reference to a discussion I had recently with a LH account manager, LH haven't even considered that use of their "agent" website will entail using a credit card which will also entail a fee. They claim they don't want clients going direct because they can't cope with it. Too true, because if they did, it would then cost them more to process. Why do they have to re-invent the

wheel? There is a perfectly good system for delivering product to market - it's called a GDS.”

- “It is not only the pricing element that is of concern. Lufthansa wants agents to use their direct booking portal but this is unworkable for the majority of agents for the following reasons:
 - Fails to take the data requirements of most corporate travel programs into consideration.
 - Does not provide interlining, booking changes, amendments and cancellation capabilities.
 - No integration with TMC back office technology.
 - Negative impact on productivity levels of business travel consultants.”
- “We support clients on a worldwide basis including Germany. Most contact us directly for a last minute change or when their flight is cancelled due to weather or strikes. Currently through our reservation system we are able to orchestrate these changes in a matter of minutes and going on the web site will just cause another step in our workflow.”
- “It makes booking corporate travelers more difficult especially if they make frequent changes. Trying to keep track of and change reservations from multiple online sources would prove to be a nightmare.”
- “Direct booking is not an option for us - we need to have consistency in our data booked via our travel management company.”
- “Direct website bookings will create the unnecessary burden of added accounting paperwork. GDS bookings streamline workflow in a very efficient manner. Booking on directly on any carrier's website can easily lead to biased pricing.”
- “This will produce a direct and heavy impact on travel agents' business. Over time (after cancelling all commissions), all travel agencies have been forced to work for all airlines for free. Now, this proposal will force travel agents to pay to work for the airlines. Does anyone recognize any common sense here? How many agencies will be closed if this LHG "brilliant idea" is accepted globally? Shall we count the victims later or shall we prevent this shameful act to happen? What will happen if airlines lose agents? Or maybe travel agents' role in airlines' success has not been considered at all.”
- “I am concerned that they will not continue to provide full content through our agency and that it will add additional costs to our company.”
- “This will add cost to our company as we have a managed-travel program and book through a GDS system.”

- “Not comprehensible! This will add additional cost and make internal processes and reporting more complex. No added value; only for LH and their shareholders.”
- “It will be extremely inefficient for our processes, and seems to be moving the industry backwards.”
- “This will add an additional burden to every aspect of booking on behalf of business travelers.”
- “It will add more cost to student travel or faculty research costs.”
- “It will have an enormous impact on our travel budget. I would rather they increase the cost of the ticket versus adding an additional surcharge.”
- “This policy negatively affects both agents and consumers by penalizing agents for using their most effective booking tool – the GDS.”
- “We use one travel agency globally in order to track data, ensure travellers’ security and enforce the usage of our preferred vendors. The travel agency is our partner and ensures that travellers book in line with our travel policy. It is unacceptable to allow travellers to book through airline websites directly as we would lose quality of data and control of the booking behavior. It is not acceptable to force the agency to book through LHG websites, as it is inefficient, increases workload, etc. It would be better just to increase the airfares instead of introducing a separate fee as it becomes more and more difficult to compare the total cost of trip (flight).”
- “This will result in higher costs, no comparison shopping when using LHG websites and travel security programs not working any more.”
- “A proposal that increases prices to customers, while increasing their hassles, represents a flawed strategy.”

III. Abuse Of Dominant Position

- “No airline should penalize travelers or agents for using websites other than the airline's own to search and pay for tickets. If this is allowed to stand, other airlines will do the same. It seems like restraint of trade and competition.”
- “This would coerce clients to book direct with LHG with the consequence of having to pay higher prices ultimately by having to go to several carriers websites to book piece meal tickets.”

- “It a shame that one big airline can bully the whole travel industry, and put us at a disadvantage, and still call us their partners and valid customers.”
- “It creates an uneven playing field for agent pricing vs. airlines’ direct booking sites.”
- “Bully boy tactics of a dominant player in its home market. Totally unfair as it is not being applied to all outlets (i.e. it excludes LHG’s own ‘internal’ sales outlets - which happen to be the least cost efficient distribution channel - and only applies to external distribution channels). How can this be construed as fair-trading? External distribution channels are being forced to subsidize LHG’s cost-inefficient internal distribution channels. It is about time the airlines were brought to heel, anti-trust immunity removed, and forced to operate in a truly competitive market.”
- “Implementing this fee without preparing alternatives such as online booking tool interfaces etc. means LHG is using its strong market position. Obviously the fee is much higher than the real costs are for LHG. We are only able to decide between higher costs or inefficient processes which would cost a lot, too.”
- “In India the LHG program will massively wipe out ordinary travel agents as no customer will pay an additional cost of Rs.1300 over and above the ticket fare. Since LHG has dominance over the other Star Alliance members, all of them may have to follow suit, including our national carrier. This would mean that all airlines operating in India would eventually enforce similar surcharges. Thus, Lufthansa would be driving the final nail in the travel agents’ coffin.”
- “I think that your surcharge policy is not right and it is not professional. You are blackmailing us.”
- “Terrible idea intended to shift legitimate airline distribution costs to others. Damaging to efficiency and transparency in the travel business from top to bottom.”
- “You already account for all your costs, including distribution, in your fares. This is not about money - it is about control. It is a fare increase to corporate clients so they do not compare your fares with other options in the market and make the choice that is best for the company spend.”
- “Outrageous abuse of power.”

IV. Setting A Dangerous Precedent

- “This will set a precedent in the airline industry and other airlines will follow if this surcharge is allowed. It diminishes the corporate policy to book through

the TMC and adversely impacts the corporate security program wherein the reservation is tracked through the TMC.”

- “I am against it. It raises prices and consumers pay the surcharge. Other airlines will follow and where will it end? How high will it go?”
- “It will bring about 50,000 Euros in additional costs to our organization and opens the door for more extras added this way.”
- “Not only is this anti-agent, it's also anti-consumer. It adds to the agent's workload, increases the cost to the consumer and is a totally retrograde step.”
- “Unfair change of competitive situation: LHG directs clients to their direct distribution channels with a fare increase. This will only be the first step - if it works, LHG will also start providing specific fares and products only through their distribution channels. And other airlines are likely to follow.”
- “It is absolutely a moneymaker for them on the back of the already financially strained business traveler! My concern is that this policy will be instituted by all other carriers, which in turn will add more fees to an already strapped industry.”
- “The whole ethos of this move is to shift airline distribution costs onto the client/agent rather than being shouldered by the airline. The main concern is that other major airlines will adopt a similar strategy, which would be a major disadvantage for the travel industry - the majority of whom use established GDS for all airline reservations.”
- “It is absolutely unfair and will lead to unhealthy competition and may lay the path for other airlines to follow this route thus making air travel more expensive and less competitive.”

V. Harming The Indirect Channel And Managed-Travel Programs

- “This is the beginning of the end for corporate travel agents.”
- “It is an undisguised fare increase and an unnecessary attempt to disrupt established and efficient industry and consumer practice.”
- “It is not our responsibility to judge on distribution cost of our suppliers but when it comes to price differentiation in sales channels this is not acceptable. LHG does not give us an appropriate alternative solution for selling their products at the same price and is therefore putting us in an uncomfortable and unfair situation.”

- “This creates ill feeling in the worldwide TMC industry. But, more importantly, why does LHG feel the need to separate out distribution costs, highlight them and charge the customer more if they use a TMC/ GDS system. It is simply trying to force TMCs to go back to unidirectional selling a thing that was originally banned in the EU way back in the days when GDSs used to deliver separate content and were forced to deliver aggregated non-biased content across the board to stop unidirectional selling in this way. What happened to the EU rules on this? It is a bad move by LHG as part of their initial salvo on NDC. NDC has been tried and failed by airlines years ago via their own individual websites but failed and so they are now trying another tactic. When will LHG also realize it is not just about selling more content to the customer. TMCs "manage" their customers in so many other ways that airlines can never do, including full P2P processing, track and trace, control of policies, airfare and hotel programmes. Need I go on?”
- “This move dismantles all our systems and not only forces additional distribution costs to the end travelers but it also causes a huge increase in our costs to manage bookings outside the central GDS causing total chaos across many lines. Forcing agencies and customers into a decentralized, direct-connect strategy goes against all conventional wisdom, back to the 80s prior to the advent of GDS systems. As a top Lufthansa partner, travel agencies and management companies provide great value to the LHG, often at 0 commission, and now you want us to pay your GDS distribution costs? Please immediately reverse this "penny-wise and pound foolish move". Further signaling to IATA members at the recent meeting in Miami is questionable at best and should be questioned by governing authorities.”
- “This is a new reckless revenue charged to the corporations without taking into considerations any of the other actors in our business. There is no transparency regarding why this amount and why now. It is a preparation to the forthcoming IATA NDC system to steer the corporate customers out of the GDSs, which are still the only true neutral distribution channels that allows a instant and complete view of the airlines offer to a destination.”
- “The public is not stupid nor are the companies who book travel for business and leisure purposes. When Lufthansa charges 16 Euros for non-Lufthansa web bookings...they are implementing a plan where the public will not be able to search across all carriers for the lowest fares unless they are willing to pay. I find Lufthansa's actions and the support of IATA's NDC plan a blow to the public's ability to have access to all possible travel options without paying a substantial fee. I also believe that their actions are completely against the public having access to all possible flight options. I can only hope that the DOT will not allow something like this to happen for flights being booked in the US.”

- “We do not agree at all. It is a highly restrictive approach and what LHG is attempting to do is to bring in a huge web disparity and losing the goodwill of agencies. It also will lead to huge consumer challenges and make it difficult for consumers to weigh their rightful options prior to ticketing.”
- “It is an unjustifiable amount and is being introduced with no discussions with their travel trade partners. It will increase traveller costs when they choose to use the services of a TMC - which many of them do now.”
- “I am appalled. This is a direct slap in the face to the travel agencies who have support LH over the years. LH is saying book on our website or call or you will be punished by being forced to pay an additional fee.”
- “I believe it penalizes businesses that opt for a consolidated managed-travel program. The costs of distribution are nowhere near \$16 Euros per ticket and I believe that Lufthansa is trying to inflate their bottom line with a price increase targeted at their best customers.”
- “This represents an unfair penalty for using a travel management company or travel agency.”
- “It is discriminatory and a blatant disregard of their and our clients. It is a cynical move to undermine the travel agents and cut us out of the picture entirely.”
- “A 16 Euro surcharge would have negative implications for the travel agents and their customers.”
- “We think that this surcharge discriminates against our travel agency and all other agents all over the world. Also we think that there are better ways to solve this problem than this option.”
- “We have been cut out of commissions, so now more cuts. You have someone selling your product for free. Does that not help you at all? Are you looking for us to pay you to see your product? There are so many other ways for you to cut costs and gain extra money. Why must you always hurt the person that works for you for free?”
- “The Lufthansa Group is a very important partner to our agency. Almost 40% of our customers choose to travel with LHG. The surcharge of 16 EURO for issuing tickets through GDSs is a significant cost increase for the end users, in addition to LHG’s trend to introduce more and more restrictions to reservation procedures, ticketing time limits and fare restrictions regarding change of travel and cancellation of travel. Our group is concentrating on quality of our service as the main reason for our clients choose to book their travel with us. As we understand the need to cut the costs, in recent years LHG has lowered

the quality of their products in the terms of flexibility to our clients. I also need to say that in same time our costs have been raised due to more demands on reservation handling. These costs due to competition issues can't be passed to end users, so it resulted in lowering the ticket service charge. For this sales agents are forced to handle more reservations to compensate, thus resulting in lowering the quality of their service to an end user. Our group has always avoided the cooperation with low-cost companies. Reason for this is that we believe that the quality of their products is not sufficient for our clients, and the rules and resolutions they enforce on clients are inferior in regards to IATA standards. There is also a loyalty to partners like LHG and our GDS that were our partners long before. Enforcing new restrictions, and especially surcharge for ticket issuance through GDS is a final message to us that our loyalty is long overdue. I am afraid that we are not able to take up on us the additional cost, and must pass on new surcharge to the end user. The lowering in our sales we are forced to compensate by promoting other companies that are not setting themselves as our competition but as our partners.”

- “Instead of rewarding us because we sell their tickets, they want to punish us. I also think that we have no time at all, to read many different sites... to follow the rules of the airline, as well as the ability to track our passengers who fly with LH if it is on a different system. There may be changes in the timetable or anything, and then passengers perhaps wouldn't be informed on time.”
- “This is an aggressive move, inconsiderate of their major clients' need for managed travel through a GDS.”
- “This represents a big risk for the whole business. No more transparency, higher cost, totally wrong direction. LH should improve their product.”
- “The uncoordinated launch worries me even more than the 16 Euros itself. Clearly there is nothing "transparent" about this move that seems to be aimed at the corporate traveler since that traveler relies much more on GDS to be compliant with a company's policy. It is also resulting in a loss of comparison shopping.”
- “This is a terrible policy and will further disrupt corporate distribution of the airline product. We oppose your actions. We have to get some normal regulation back into our industry and have you understand that we are serious and not violating any antitrust statutes in the United States. Our consumer groups here in this country will not stand for further decimation of consumer interests, corporate travel, leisure travel and the disruption and unnecessary added expense.”
- “The charge will unfairly and disproportionately affect corporations and the travel management companies they use to plan and manage travel for them.”

- “It’s an effort to negotiate publicly and penalize the customer for using a TMC.”
- “It presents a challenge to effectively manage a corporate travel program. We expect our travelers to book through our preferred travel agency and booking tool to manage cost and traveler security. To us, it is a direct price increase and unfair way to increase airfares even though LHG positions it as a move to decrease their distribution expense.”
- “This is forcing corporate TMCs to adopt inefficient processes to provide content, which will also add to the cost of acquisition.”
- “We have met with our LH rep and have written also to their headquarters detailing our objections to this fare increase and attempt to push our travelers to alternate booking sources where they will no longer see comparative shopping options. If this is allowed to go through and other carriers follow, we will write to our government representatives to add our voice to those who are pushing for transparency and fairness in marketing and distribution.”

...

Note: Comments edited for brevity and consistent format.