

**Before the
U.S. DEPARTMENT OF STATE
OFFICE OF THE SECRETARY
Washington, D.C. 20530**

In the Matter of)	
)	
Information on Claims Raised About State)	Docket No. DOS_FRDOC_0001-3228
Owned Airlines in Qatar and the UAE)	
)	
)	

**COMMENTS OF
BUSINESS TRAVEL COALITION AND OPENSKIES.TRAVEL**

June 30, 2015

Communications with respect to this document should be sent to:

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I. BACKGROUND

In the dispute over U.S. Open Skies policy and Gulf carrier access to U.S. markets, all manner of studies, counter studies and reports have been submitted by the commercial participants in this debate to the Administration's three public dockets. However, no vehicle was established to hear the views of the most important stakeholder in this debate - the American consumer - in a statistically representative manner. OpenSkies.travel, a coalition of travel managers, travel management companies, travel industry suppliers, consumer groups and travel organizations from around the world set out to fill that void.

OpenSkies.travel is pleased to file the results of a U.S. consumer survey, conducted online using Google Consumer Surveys, among 2,546 U.S. adults ages 18 and older. The survey found that 89 percent of Americans who have traveled internationally or outside of the United States by airplane agreed that they support U.S. government Open Skies policy objectives and 67 percent of Americans agreed that the government should not give into U.S. airlines' demands that foreign airline expansion into the U.S. be stopped.

The survey results should help illuminate the issue for the U.S. Departments of Transportation, State and Commerce. Consumers, as the most important aviation policy stakeholder, realize the significant benefits to them and their communities from our Open Skies policy and see straight through the U.S. airlines' allegations of unfair Gulf carrier competition as nothing more than blatant commercial protectionism. Recent business-traveler comments in the *Wall Street Journal* only reinforce this widespread understanding (<http://btcnews.co/1Duy9el>).

II. SUMMARY RESULTS

- A majority of survey participants, or 61 percent, agrees that U.S. airlines need more competition from foreign airlines. (strongly agree 21.6% (+1.9 / -1.8); somewhat agree 39.3% (+2.3 / -2.2)

- A minority, or 41 percent, agrees major U.S. airlines are focused on the best interests of consumers. (strongly agree 9.7% (+1.5 / -1.3); somewhat agree 31.3% (+2.2 / -2.1)

- A majority, or 51 percent, agrees Gulf airlines are focused on the best interests of consumers. (strongly agree 12.6% (+1.3 / -1.2); somewhat agree 38.0% (+1.9 / -1.8)

- A large majority, or 76 percent, agrees that the Gulf airlines have increased travel opportunities from the United States to key markets in the Middle East, India and Southeast Asia. (strongly agree 18.3% (+1.4 / -1.2); somewhat agree 57.6% (+2.2 / -2.1)

See Addendum 1 for complete survey results.

III. ANALYSIS

Now that the U.S. Big Three airlines - Delta Air Lines, American Airlines, United Airlines - have secured antitrust immunity for their global alliances and joint ventures, and have engineered U.S. domestic consolidation, they want to pull up the "Drawbridge" and lock down "Fortress America" by seeking to freeze the Gulf Carriers' (Etihad Airways, Emirates and Qatar Airways) and other foreign carriers' expansion into the U.S.

Allowing the Big Three to hijack the public-policy-making process and to deny consumers access to competitive options and alternatives would completely undermine and reverse the goals and principles of U.S. Open Skies policy. The interests being served are the Big Three's. Only a minority of consumers (41 percent) believes U.S. airlines are focused on their best interest compared with a majority (51 percent) for the Gulf carriers. Importantly, a large majority (76 percent) of consumers agree that the Gulf carriers have increased travel opportunities from the U.S. to key markets in the Middle East, India and Southeast Asia.

OpenSkies.travel and its members urge the Administration to act with a sense of urgency to reject the protectionist demands of the Big Three and thereby to remove the ongoing financial and economic harm to U.S. consumers and other airlines and travel industry participants as well as our Open Skies partners who took us at our word when we convinced them to enter into these air service liberalization agreements.

VI. METHODOLOGY

This survey was conducted online by Google Consumer Surveys, June 11, 2015 to June 19, 2015 and is based on 2546 responses. The sample was consumers from the U.S. national adult Internet population who answered "Yes" to the question, "Have you ever traveled internationally or outside of the United States by airplane?" The average number of trips taken by airline in the past year for survey respondents was 2.3. For additional information on survey methodology, please see Addendum 2.

Respectfully Submitted,



Kevin P. Mitchell
Chairman and Founder
Business Travel Coalition

Addendum 1

Consumer Survey Questions	Results	
The U.S. has Open Skies agreements with 115 countries to lower airfares and provide more convenient travel options. Do you support this U.S. government policy?	44.1% 45.1% 6.2% 4.6%	Strongly support (+2.3 / -2.3) Somewhat support (+2.3 / -2.3) Somewhat non supportive (+1.3 / -1.1) Strongly non supportive (+1.2 / -0.9)
How strongly do you agree or disagree with this statement: U.S. airlines need more competition from foreign airlines.	21.6% 39.3% 26.7% 12.4%	Strongly agree (+1.9 / -1.8) Somewhat agree (+2.3 / -2.2) Somewhat disagree (+2.1 / -2.0) Strongly disagree (+1.6 / -1.4)
How strongly do you agree or disagree with this statement: The government should not give into U.S. airlines' demands that foreign airline expansion into the U.S. be stopped.	24.1% 42.4% 24.5% 9.0%	Strongly agree (+2.0 / -1.9) Somewhat agree (+2.3 / -2.3) Somewhat disagree (+2.0 / -1.9) Strongly disagree (+1.4 / -1.3)
How strongly do you agree or disagree with this statement: Major U.S. airlines are focused on the best interests of consumers, i.e. providing good service at reasonable prices?	9.7% 31.3% 35.6% 23.4%	Strongly agree (+1.5 / -1.3) Somewhat agree (+2.2 / -2.1) Somewhat disagree (+2.2 / -2.1) Strongly disagree (+2.0 / -1.9)
How strongly do you agree or disagree with this statement: Gulf airlines are focused on the best interests of consumers, i.e. providing good service at reasonable prices.	12.6% 38.0% 34.1% 15.3%	Strongly agree (+1.3 / -1.2) Somewhat agree (+1.9 / -1.8) Somewhat disagree (+1.9 / -1.8) Strongly disagree (+1.4 / -1.2)
Do you agree that the Gulf airlines have increased travel opportunities from the United States to key markets in the Middle East and in India and Southeast Asia?	18.3% 57.6% 17.6% 6.5%	Strongly agree (+1.4 / -1.2) Somewhat agree (+2.2 / -2.1) Somewhat disagree (+1.5 / -1.3) Strongly disagree (+1.1 / -0.8)

Addendum 2

OpenSkies.travel U.S. Consumer Survey Methodology

The negative and positive values in the parenthesis represent the range for the [Confidence Interval](#) while the graphical illustration for it, is the error bar.

Confidence Interval

In the survey results, the values inside the parentheses are ranges to determine the confidence interval. This is to say that if you were to run the same survey again, there's a 95% chance that the percentage of respondents who chose that answer would be in that confidence interval range.

In the following example, the confidence interval indicates that there's a 95% chance that the percentage of respondents who chose Answer A would be between 43.4% and 24.8% if you run the survey again: Answer A 33.5% (+9.9/-8.7)

This calculation is based on $33.5 + 9.9 = 43.4$ and $33.5 - 8.7 = 24.8$.

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GOOGLE WHITE PAPER

Comparing Google Consumer Surveys to Existing Probability and Non-Probability Based Internet Surveys

Paul McDonald, Matt Mohebbi, Brett Slatkin
Google Inc.

ABSTRACT

This study compares the responses of a probability based Internet panel, a non-probability based Internet panel and Google Consumer Surveys against several media consumption and health benchmarks. The Consumer Surveys results were found to be more accurate than both the probability and non-probability based Internet panels in three separate measures: average absolute error (distance from the benchmark), largest absolute error, and percent of responses within 3.5 percentage points of the benchmark. These results suggest that despite differences in survey methodology, Consumer Surveys can be used in place of more traditional Internet based panels without sacrificing accuracy.

Read full white paper at

https://docs.google.com/a/google.com/viewer?url=http://www.google.com/insights/consumersurveys/static/consumer_surveys_whitepaper.pdf