Appendix A

Statement of Enforcement Policy Regarding Unfair Exclusionary Conduct

Department of Transportation
Office of the Secretary
April 1998

(Docket No. OST-98-3713, Notice 98-16)

Congress has put a premium on competition in the air transportation industry in the policy goals enumerated in 49 U.S.C. §40101. The Department of Transportation thus has a mandate to foster and encourage legitimate competition. We believe that legitimate competition encompasses a wide range of potential responses by major carriers to new entry into their hub markets[1]—responses involving price reductions or capacity increases, or both, or even neither. Some of the responses we

[1] We use the term "new entrant" to mean an independent airline that has started jet service within the last ten years and pursues a competitive strategy of charging low fares. We use the term "major carrier" to mean the major carrier that operates the hub at issue.

have observed, however, appear to be straying beyond the confines of legitimate competition into the region of unfair competition, behavior which, by virtue of 49 U.S.C. §41712, we have not only a mandate but an obligation to prohibit.

Following Congress's deregulation of the air transportation industry in 1978, all of the major air carriers restructured their route systems into hub-and-spoke networks. Major carriers have long charged considerably higher fares in most of their spoke city-pairs, or the "local hub markets," than in other city-pairs of comparable distance and density. In recent years, when small, new-entrant carriers have instituted new low-fare service in major carriers' local hub markets, the major carriers have increasingly responded with strategies of price reductions and capacity increases designed not to maximize their own profits but rather to deprive the new entrants of vital traffic and revenues. Once a new entrant has ceased its service, the major carrier will typically retrench its capacity in the market or raise its fares to at least their pre-entry levels, or both. The major carrier thus accepts lower profits in the short run in order to secure higher profits in the long run. This strategy can benefit the major carrier prospectively as well, in that it dissuades other carriers from attempting low-fare entry. It can hurt consumers in the long run by depriving them of the benefits of competition. In those instances where the major carrier's strategy amounts to unfair competition, we must take enforcement action in order to preserve the competitive process.

We hereby put all air carriers on notice, therefore, that as a matter of policy, we propose to consider that a major carrier is engaging in unfair exclusionary practices in violation of 49 U.S.C. §41712 if, in response to new entry into one or more of its local hub markets, it pursues a strategy of price cuts or capacity increases, or both, that either (1) causes it to forego more revenue than all of the new entrant's capacity could have diverted from it or (2) results in substantially lower operating profits—or greater operating losses—in the short run than would a reasonable alternative strategy for competing with the new entrant. Any strategy this costly to the major carrier in the short term is economically rational only if it eventually forces the new entrant to exit the market, after which the major carrier can readily recoup the revenues it has sacrificed to achieve this end. We will therefore be focusing our enforcement efforts on this strategy while continuing our scrutiny of any other strategies that may threaten competition.

Our policy represents a balance between the imperative of encouraging legitimate competition in all of its various forms and the imperative of prohibiting unfair methods of competition that ultimately deprive consumers of the range of prices and services that legitimate competition would otherwise afford them. This policy does not represent an attempt by the Department to reregulate the air transportation industry: we are neither prescribing nor proscribing any fares or capacity levels in any market. Rather, we are carrying out our statutory responsibility to ensure that if a new-entrant carrier's entry into a major carrier's hub markets fails, it fails on the merits, not due to unfair methods of competition.

BACKGROUND

The competitive benefits of deregulation have been exhaustively documented in numerous studies. Among other things, the major carriers' development of hub-and-spoke networks has brought most domestic air travelers more extensive service, more frequent service, and lower fares. Also widely documented are the competitive advantages in serving local markets that a major carrier enjoys at its hub. Flow traffic, or the passengers that the major carrier is transporting from their origins to their destinations by way of its hub, typically accounts for more than half of the traffic in local hub markets. Flow traffic thus allows the major carrier to operate higher frequencies in local markets than the local traffic alone would support. In turn, in local markets served by more than one carrier, the major carrier's higher frequency attracts a greater share of the local traffic than that carrier would otherwise carry.[2] Due to its more extensive route network, the major carrier is also able to offer a frequent-flier program and commission overrides—i.e., higher commissions to travel agents for a higher volume of sales—that are more effective. These factors, too, confer competitive advantages on the major carrier in local hub markets.

[2] This phenomenon, called the "S-curve" effect, reflects the value that time-sensitive travelers place on schedule frequency.

These advantages have translated into the power to charge higher local fares. A major carrier usually provides all of the service in most of its local hub markets, the exceptions being mainly city-pairs whose other endpoints are hubs of other major carriers or city-pairs served by low-fare carriers. Many local hub markets that have enough traffic to support competitive nonstop service are nonetheless served only by the major carrier. In the absence of competition, the major carrier is able to charge fares that exceed its fares in nonhub markets of comparable distance and density by upwards of 40 percent, or at least $100 to $150 per round trip. Even in those local hub markets in which the major carrier competes with another major carrier, load factors may be relatively low, but fares are relatively high. We have observed, in fact, that low-fare service has provided the only effective price competition in major carriers' local hub markets.

Major carriers use sophisticated yield-management techniques to price-discriminate and thereby maximize their revenues. They can monitor sales and fine-tune fares, change fare offerings for individual flights as frequently as conditions may warrant, and segment each city-pair market so that those passengers needing the greatest flexibility pay the highest premiums while passengers needing progressively less flexibility pay progressively lower fares. The lowest fares, which typically carry heavy restrictions, provide revenue for seats that the carrier would otherwise fly empty. It is in the carrier's interest, of course, to sell each seat at the highest fare that it can. Generally, major carriers find it most profitable to focus on high-fare service, leaving much of the demand for low-fare service in many local hub markets unserved.

Both these unserved consumers and travelers paying fare premiums in local hub markets stand to reap substantial benefits from new competition. Southwest, a low-fare carrier certificated before deregulation, and various new-entrant carriers have shown that a nonhub carrier can compete successfully with a major carrier in the latter's hub markets.[3] By

[3] Southwest has scored the broadest and longest-lived success with this strategy, having established a strong presence in numerous local markets at a number of hubs. New-entrant carriers such as ValuJet (now AirTran Airlines), Morris Air (before being acquired by Southwest), and Frontier have entered local markets at Atlanta, Salt Lake City, and Denver, respectively. Vanguard, another new-entrant carrier, has pursued a strategy of providing direct service between Kansas City and several hubs.

charging lower fares, the new entrant can profitably serve that portion of a local market's demand which the major carrier has mostly not been serving; the resultant competition can bring fares down for most travelers. Traffic stimulation and reductions in average fares can both be dramatic. According to a study by this Department, low-fare competition saved over 100 million travelers an estimated $6.3 billion in the year that ended September 30, 1995.[4] At Salt Lake City, for example, local markets served by Morris Air and Southwest saw their traffic triple and their average fares decrease by half, while local markets served only by the dominant carrier saw their fares increase. By late 1995, the average fares in local markets served by Morris Air and Southwest were only one-third as high as fares in other local Salt Lake City markets.

THE PROBLEM

The major carriers view competition by new entrants as a threat to their ability to maximize revenues through price discrimination. As noted, not only will the previously unserved consumers take advantage of a new entrant's low fares, but so, too, will at least some of the consumers that have been paying the major carrier's higher fares. Regardless of how the major carrier chooses to respond to the new entry, the more low-fare capacity available in the market, the less of its high-fare traffic the major carrier will retain. The stakes are high: a major carrier's fare premiums in its local hub markets can mean revenues of tens of millions of dollars annually over its revenues in markets where fares are disciplined by competition.

In some instances, a major carrier will choose to coexist with the low-fare competitor and tailor its response to the latter's entry accordingly. For example, at cities like Dallas and Houston, the major carriers tolerate Southwest's major presence in local markets by not competing aggressively for local passengers. Instead, they focus their efforts on carrying flow passengers to feed their networks. At the other extreme, the major carrier will choose to drive the new entrant from the market. It will adopt

[4] *The Low Cost Airline Service Revolution*, April 1996. A good portion of the savings occurred in local hub markets.

a strategy involving drastic price cuts and flooding the market with new low-fare capacity (and perhaps offering bonus frequent-flier miles and higher commission overrides for travel agents as well) in order to keep the new entrant from achieving its break-even load factor and thus force its withdrawal. Before the new entrant does withdraw, the major carrier, with its higher cost structure, will carry more low-fare passengers than the new entrant, thereby incurring substantial self-diversion of revenues—i.e., it will provide unrestricted low-fare service to passengers who would otherwise be willing to pay higher fares for service without restrictions. Consumers, for their part, enjoy unprecedented benefits in the short term. After the new entrant's withdrawal, however, the major carrier drops the added capacity and raises its fares at least to their original level. By accepting substantial self-diversion in the short run, the major carrier prevents the new entrant from establishing itself as a competitor in a potentially large array of markets. Consumers thus lose the benefits of this competition indefinitely.[5]

We propose to consider this latter extreme to be unfair exclusionary conduct in violation of 49 U.S.C. §41712. We have been conducting informal investigations in response to informal allegations of predation, and we have observed behavior consistent with the behavior described above. The following hypothetical example involving a local hub market serves to illustrate the problem. Originally, the major carrier is able to charge one-third of its local passengers a fare of $350. These passengers generate revenue of $3 million per quarter, which constitutes half of the major carrier's total local revenue. After new entry, the major carrier initially continues to price-discriminate, continues to sell a large number of seats at $350, and sustains little revenue diversion. Then the major carrier changes its strategy and offers enough unrestricted seats at the new entrant's fare of $50 to absorb a large share of the low-fare traffic. It sells far more seats at low fares than the new entrant's total seat capacity. Consequently, virtually all of the passengers who once paid $350 now

[5] Economists have recognized that consumers are harmed if a dominant firm eliminates competition from firms of equal or greater efficiency by cutting its prices and increasing its capacity, even if its prices are not below its costs. See Ordover and Willig, An Economic Definition of Predation: Pricing and Product Innovation, *Yale Law Journal*, Vol. 91, No. 8, 1981.

pay just $50, and instead of $3 million, these passengers now account for revenue of less than $0.5 million per quarter. To make up the difference, the major carrier would have to carry six more passengers for each passenger diverted from the $350 fare to the $50 fare. The major carrier loses more revenues through self-diversion than it lost to the new entrant under its initial strategy.

DEPARTMENT'S MANDATE

Our mandate under 49 U.S.C. §41712 to prohibit unfair methods of competition authorizes us to stop air carriers from engaging in conduct that can be characterized as anticompetitive under antitrust principles even if it does not amount to a violation of the antitrust laws. The unfair exclusionary behavior we address here is analogous to (and may amount to) predation within the meaning of the federal antitrust laws.[6]

Although the Supreme Court has said that predation rarely occurs and is even more rarely successful, our informal investigations suggest that the nature of the air transportation industry can at a minimum allow unfair exclusionary practices to succeed. Compared to firms in other industries, a major air carrier can price-discriminate to a much greater extent, adjust prices much faster, and shift resources between markets much more readily. Through booking and other data generated by computer reservations systems and other sources, air carriers have access to comprehensive, real time information on their competitors' activities and can thus respond to competitive initiatives more precisely and swiftly than firms in other industries. In addition, a major carrier's ability to shift assets quickly between markets allows it to increase service frequency and capture a disproportionate share of traffic, thereby reaping the competitive advantage of the S-curve effect. These characteristics of the air transportation industry allow the major carrier to drive a new entrant from a local hub market. Having observed this behavior, other potential new entrants refrain from entering, leaving the major carrier free to reap greater profits indefinitely.

[6] We will continue to work closely with the Department of Justice in evaluating allegations of anticompetitive behavior, but we will take enforcement action under 49 U.S.C. §41712 against unfair exclusionary practices independently.

ENFORCEMENT ACTION

We will determine whether major carriers have engaged in unfair exclusionary practices on a case-by-case basis according to the enforcement procedures set forth in Subpart B of 14 CFR Part 302. We will investigate conduct on our own initiative as well as in response to formal and informal complaints. Where appropriate, cases will be set for hearings before administrative law judges. We will apply our policy prospectively, and we expect to refine our approach based on experience. We anticipate that in the absence of strong reasons to believe that a major carrier's response to competition from a new entrant does not violate 49 U.S.C. §41712, we will institute enforcement proceedings to determine whether the carrier has engaged in unfair exclusionary practices when one or more of the following occurs:

1. The major carrier adds capacity and sells such a large number of seats at very low fares that the ensuing self-diversion of revenue results in lower local revenue than would a reasonable alternative response,
2. The number of local passengers that the major carrier carries at the new entrant's low fares (or at similar fares that are substantially below the major carrier's previous fares) exceeds the new entrant's total seat capacity, resulting, through self-diversion, in lower local revenue than would a reasonable alternative response, or
3. The number of local passengers that the major carrier carries at the new entrant's low fares (or at similar fares that are substantially below the major carrier's previous fares) exceeds the number of low-fare passengers carried by the new entrant, resulting, through self-diversion, in lower local revenue than would a reasonable alternative response.

As the term "reasonable alternative response" suggests, we by no means intend to discourage major carriers from competing aggressively against new entrants in their hub markets. A major carrier can minimize or even avoid self-diversion of local revenues, for example, by matching the new entrant's low fares on a restricted basis (and without significantly increasing capacity) and relying on its own service advantages to retain high-fare traffic. We have seen that major carriers can operate profitably in the same markets as low-fare carriers. As noted, major carriers are competing with Southwest, the most successful low-fare carrier, on a broad scale and are nevertheless reporting record or near-record earnings.[7] We will consider whether a major carrier's response to new entry is consistent with its behavior in markets where it competes with other new-entrant carriers or with Southwest. Conceivably, a major carrier could both lower its fares and add capacity in response to competition from a new entrant without any inordinate sacrifice in local revenues. If the new entrant remained in the market, consumers would reap great benefits from the resulting competition, and we would not intercede. Conceivably, too, a new entrant's service might fail for legitimate competitive reasons: our enforcement policy will not guarantee new entrants success or even survival. Optimally, it will give them a level playing field.

The three scenarios set forth above reflect the more extreme and most obviously suspect responses to new entry that we have observed in our informal investigations. We do not intend them as an exhaustive list: we will analyze other types of conduct as well to determine whether to institute enforcement proceedings.[8] Besides examining service and pricing behavior, we will consider other possible indicia of unfair competition: for example, allegations that major carriers are attempting to block new entrants from local markets by hoarding airport gates, by using contractual arrangements with local airport authorities to bar access to an airport's infrastructure and services, or by using bonus frequent flyer awards or travel agent commission overrides in ways that appear to target new entrants unfairly.

In an enforcement proceeding, if the administrative law judge finds that a major carrier has engaged in unfair exclusionary practices in violation of 49 U.S.C. §41712, the Department will order the carrier to cease and desist from such practices. Under 49 U.S.C. §46301, violation of a Department order subjects a carrier to substantial civil penalties.

We have crafted our policy not to protect competitors but to protect competition. We hope that it will provide consumers with the benefits

[7] One major carrier's internal documents that we reviewed as part of an informal investigation of alleged predation show strong profits on individual flight segments where it competes with Southwest.

[8] Moreover, our statutory responsibility to prohibit unfair methods of competition is not limited to the unfair exclusionary practices addressed here. We will continue to monitor the competitive behavior of all types of air carriers.

of competition in increasing numbers of local hub markets over the long term.

INITIAL REGULATORY FLEXIBILITY ANALYSIS: The Regulatory Flexibility Act of 1980, 5 U.S.C. §601 *et seq.*, was enacted by Congress to ensure that small entities are not unnecessarily and disproportionately burdened by government regulations or actions. The Act requires agencies to review proposed regulations or actions that may have a significant economic impact on a substantial number of small entities. For purposes of this policy statement, small entities include smaller U.S. airlines. It is the Department's tentative determination that the proposed enforcement policy would, as explained above, give smaller airlines a better opportunity to compete against larger airlines by guarding against exclusionary practices on the part of the larger airlines. To the extent that the proposed policy results in increased competition and lower fares, small entities that purchase airline tickets will benefit. Our proposed policy contains no direct reporting, record-keeping, or other compliance requirements that would affect small entities.

Interested persons may address our tentative conclusions under the Regulatory Flexibility Act in their comments submitted in response to this request for comments.

PAPERWORK REDUCTION ACT: This policy statement contains no collection-of-information requirements subject to the Paperwork Reduction Act, P.L. No. 96-511, 44 U.S.C. Chapter 35.

FEDERALISM IMPLICATIONS: This policy statement would have no substantial direct effects on the States, on the relationship between the national government and the States, or on the distribution of power and responsibilities among the various levels of government. Therefore, in accordance with Executive Order 12812, we have tentatively determined that this policy does not have sufficient federalism implications to warrant preparation of a Federalism Assessment.

(Authority Citation: 49 U.S.C. §41712.)

Issued in Washington, D.C., on April 6, 1998.

Rodney E. Slater, *Secretary of Transportation*

Appendix B

Recommendations from *Winds of Change* * Concerning Competition and Other Relevant Topics

ANTITRUST POLICY

The Committee recommends that the Department of Justice (DOJ) oppose mergers or acquisitions in which carriers offer substantial parallel service in city-pair markets or share a hub airport. However, DOJ should not necessarily oppose mergers or asset acquisitions of carriers with complementary or end-to-end routes. Such mergers or asset acquisitions often may not harm competition. Given the importance of having at least three effective competitors in city-pair markets involving a connection at a hub, the maintenance of this level of choice for con-

* TRB. 1991. *Special Report 230: Winds of Change: Domestic Air Transport Since Deregulation.* National Research Council, Washington, D.C., 399 pp.

sumers should be used as a test for the adequacy of competition in "over hub" traffic when merger and acquisition proposals are considered, including acquisitions of individual assets, such as gates.

COMPUTER RESERVATION SYSTEMS (CRSs)

The committee recommends that travel agents be allowed to use their own equipment or desk equipment leased from the host carrier to access multiple CRSs. This would require a Department of Transportation (DOT) regulation to prohibit contract or lease terms that restrict the ability of travel agents to use equipment that is connected to a CRS to switch freely among CRSs, along with continuing the prohibition against display and function bias and extending it beyond CRS owners to any software used in the interface allowing multiple access.

CONSUMER INFORMATION

The committee recommends improving consumer information by requiring agents to disclose the incentive commissions (commission overrides) that they receive from carriers. This could be accomplished by a DOT regulation that has the effect of making consumers aware of the existence of override programs and the identity of the carriers favored by the agent.

CONGESTION PRICING

DOT should permit and encourage airports to experiment with congestion pricing and invite evaluation of the effectiveness of these efforts by independent researchers. In the development of these proposals, DOT should consider how to avoid the potential exercise of monopoly power by airports or airlines and their customers and how the revenues earned by congestion pricing will be used to provide needed additional capacity.

Appendix C

Informal Complaints to DOT by New Entrant Airlines About Unfair Exclusionary Practices

March 1993 to May 1999

UNFAIR PRICING AND CAPACITY RESPONSES

1. *Date Raised*: May 1999
 Complaining Party: AccessAir
 Complained Against: Northwest Airlines
 Description: AccessAir, a new airline headquartered in Des Moines, Iowa, began service in the New York–LaGuardia and Los Angeles to Moline/Quad Cities/Peoria, Illinois, markets. Northwest offers connecting service in these markets. AccessAir alleged that Northwest was offering fares in these markets that were substantially below Northwest's costs.

2. *Date Raised*: March 1999
   Complaining Party: AccessAir
   Complained Against: Delta, Northwest, and TWA
   Description: AccessAir was a new entrant air carrier, headquartered in Des Moines, Iowa. In February 1999, AccessAir began service to New York–LaGuardia and Los Angeles from Des Moines, Iowa, and Moline/Quad Cities/Peoria, Illinois. AccessAir offered direct service (nonstop or single-plane) between these points, while competitors generally offered connecting service. In the Des Moines/Moline–Los Angeles market, AccessAir offered an introductory roundtrip fare of $198 during the first month of operation and then planned to raise the fare to $298 after March 5, 1999. AccessAir pointed out that its lowest fare of $298 was substantially below the major airlines' normal 14- to 21-day advance purchase fares of $380 to $480 per roundtrip and was less than half of the major airlines' normal 7-day advance purchase fare of $680. Similarly, in the Des Moines/Moline/Peoria–New York market, AccessAir had offered an introductory roundtrip fare of $198 that was to expire on March 20, 1999. In all of these markets, Delta, Northwest, and TWA have continued to offer fares at the level of AccessAir's introductory fares and did not match AccessAir's fare increases. AccessAir alleged that these airlines continued to charge fares that were substantially below their costs in order to drive AccessAir out of these markets and ultimately out of business.

3. *Date Raised*: August 1998
   Complaining Party: AirTran Airlines
   Complained Against: Delta Air Lines
   Description: AirTran said that Delta has been surreptitiously cutting fares on AirTran's routes to walkup passengers within a few days of departure by substantially opening lower fare, advance-purchase fare tickets to these unrestricted passengers, thereby charging substantially lower fares without restriction. AirTran said that Delta has attempted to hide this practice, which has targeted AirTran.

4. *Date Raised*: February 1998
   Complaining Party: Kiwi Airlines
   Complained Against: Continental Airlines
   Description: In February 1998, Kiwi announced that it would be inaugurating Niagara-Newark service with fares between $99 and $129.

Continental immediately lowered its lowest unrestricted fare in the Buffalo-Newark market to $79, which was matched by USAirways. Kiwi says that Continental took this step solely to defend its "fortress hub" at Newark, where Continental controls 65 percent of the gates, rather than due to economics of the market. Kiwi alleged that the Greater Buffalo area, including both Buffalo and Niagara was the relevant market for analyzing competitive practices. Kiwi noted that "when Kiwi temporarily ceased operations in the fall of 1996, fares from Newark on routes that Kiwi competed with Continental surged 172 percent."

5. *Date Raised*: March 1997
   Complaining Party: ValuJet Airlines
   Complained Against: Northwest Airlines
   Description: ValuJet alleged that Northwest responded to ValuJet's entry into the Atlanta-Memphis market in late 1993 with an immediate, drastic cut in fares. According to ValuJet, the airline began service in the fourth quarter of 1993 and by the first quarter of 1994, Northwest had reduced fares to the point that its yield from the Atlanta-Memphis route was less than half of what it had been six months earlier. ValuJet also claimed Northwest increased capacity on the Atlanta-Memphis by more than 50 percent beginning in late 1994.

6. *Date Raised*: February 1997
   Complaining Party: ValuJet Airlines
   Complained Against: Delta Air Lines
   Description: ValuJet alleged that Delta began targeting ValuJet by adding substantial capacity in markets ValuJet reentered subsequent to its fatal crash in June 1996. There were 14 Atlanta markets which ValuJet reentered after the crash, and Delta increased capacity, despite the fact that ValuJet reentered with much less capacity than before the crash. ValuJet asserted that Delta's pricing in non-ValuJet markets was significantly different from that in ValuJet markets. In markets where ValuJet had not resumed service, Delta significantly raised leisure fares. ValuJet's most telling example of Delta's conduct was the Atlanta-Mobile market. On January 6, 1997, ValuJet announced discontinuance of service. On January 7, 1997, Delta raised its fares substantially. The city of Mobile prevailed upon ValuJet to return to Mobile by offering a joint marketing

arrangement, and Delta's leisure market fares reverted to match the ValuJet leisure fare level.

7. *Date Raised*: January 1997
   Complaining Party: Frontier Airlines
   Complained Against: United Airlines
   Description: Frontier complained that United added capacity and matched Frontier's fares in several larger Denver markets served by Frontier, including Denver–Los Angeles. Frontier also asserted that United was frustrating Frontier's marketing efforts with corporate travelers by offering corporate customers in Denver discount fares that required the customers to use United in markets where it competed with Frontier in order to obtain discounts in markets where Frontier did not compete.

8. *Date Raised*: November 1996
   Complaining Party: Spirit Airlines
   Complained Against: Northwest Airlines
   Description: Spirit began operating one nonstop Detroit-Philadelphia roundtrip flight in December 1995 and added a second flight in June 1996. Initially, Northwest did not increase capacity or sell large numbers of seats at low prices in response to Spirit's entry until after Spirit added the second daily flight. Northwest thereafter added service, slashed its fares, and, by eliminating most of the restrictions applicable to its lowest discount fares, sold almost all of its seats at low fares and few seats at higher fares, thereby sharply reducing its revenues in the market. When Spirit began flying between Detroit and Boston, Northwest reacted in a similar fashion to Spirit's introduction of Detroit-Philadelphia service. Spirit complained that Northwest's increased availability of discount fares and increased capacity represented a deliberate sacrifice of short-term profits with the intent of forcing Spirit out of the markets.

9. *Date Raised*: October 1996
   Complaining Party: Vanguard Airlines
   Complained Against: American Airlines
   Description: Vanguard complained that American's responses to Vanguard's introduction of nonstop Kansas City-Dallas/Fort Worth (DFW)

flights and entry into the DFW-Phoenix and Cincinnati markets were designed to force Vanguard to withdraw from those markets and did not constitute a legitimate competitive response to Vanguard's entry. First, American substituted jet service for its commuter airline service in the DFW-Wichita market, which had been a major Vanguard market. American also added flights in the DFW-Kansas City market, even though it already heavily outscheduled Vanguard, and matched or undercut Vanguard's fares in that market. American began operating nonstop flights in the DFW-Cincinnati market, a market from which American had withdrawn two years earlier. American matched Vanguard's fares in that market and the DFW-Phoenix market. Vanguard complained that American's response to Vanguard's entry into the DFW-Phoenix market was designed to force Vanguard to withdraw from this market, and thus did not constitute a legitimate competitive response to Vanguard's entry. American matched Vanguard's fares in the DFW-Phoenix market. Vanguard also complained that American's responses to Vanguard's entry into the DFW-Cincinnati market were designed to force Vanguard to withdraw from this markets and did not constitute a legitimate competitive response to Vanguard's entry. American began operating nonstop flights in the DFW-Cincinnati market, a market from which American had withdrawn two years earlier. American matched Vanguard's fares in that market. Vanguard also complained that American substituted jet service for its commuter airline service in the DFW-Wichita market, which had been a major Vanguard market after Vanguard's institution of nonstop Kansas City-DFW flights and entry into the DFW-Phoenix and Cincinnati markets. These actions were designed to force Vanguard to withdraw from those markets and did not constitute a legitimate competitive response to Vanguard's entry.

10. *Date Raised*: March 1996
Complaining Party: Air South
Complained Against: Continental Airlines
Description: In early March 1996, Air South complained to the Department that Continental had attempted to "overlay" Air South's proposed new service offerings in three markets: Charleston-Newark, Columbia-Newark, and Myrtle Beach–Newark. Air South also alleged that Continental had made its discount fare offerings more generally available

than Air South's fares, thereby effectively undercutting Air South's fares. Air South asserted that, since Continental did not have a strong economic reason for this action, other than to drive a competitor from its market region, Continental's actions were in violation of the antitrust laws.

11. *Date Raised*: August 1995
Complaining Party: Vanguard Airlines
Complained Against: Northwest Airlines
Description: Vanguard complained that Northwest had responded to Vanguard's entry into the Chicago Midway–Minneapolis/St. Paul market with fare cuts and capacity increases designed to force Vanguard to exit the markets in August 1995. This action was similar to that taken by Northwest in May 1995 when Vanguard entered the Kansas City–Minneapolis/St. Paul market.

12. *Date Raised*: June 1995
Complaining Party: Vanguard Airlines
Complained Against: Northwest Airlines
Description: Vanguard complained that Northwest had responded to Vanguard's entry into the Kansas City–Minneapolis/St. Paul market with fare cuts and capacity increases designed to force Vanguard to exit the market. In May 1995 Vanguard entered the Kansas City–Minneapolis/St. Paul market, where Northwest's market share had exceeded 90 percent. Northwest immediately increased capacity and matched Vanguard's low fares on almost all of its six daily roundtrip flights, even though Vanguard operated only one nonstop and two one-stop roundtrip flights in the market. In addition, Northwest added a roundtrip flight to its daily Kansas City–Minneapolis/St. Paul service.

13. *Date Raised*: March 1995
Complaining Party: ValuJet Airlines
Complained Against: USAirways
Description: ValuJet alleged that USAir engaged in predatory behavior in several specific markets: Washington Dulles–Florida, Washington Dulles–Hartford, and Washington Dulles–Boston. According to ValuJet, after it began operating flights from Dulles to Boston, Hartford, and several Florida points, USAir cut its fares in the Dulles-Florida markets to

levels that could not have been economic for US Airways, and it began operating flights from Dulles to Boston and Hartford that undercut ValuJet's fares. ValuJet claimed that USAir within the last 10 years had not inaugurated service from Dulles to any city that was not a USAir hub. ValuJet alleged that USAir entered the Dulles routes and undercut its fares in order to regain its dominance of the routes between the Baltimore-Washington area and Boston, Hartford, and Florida.

14. *Date Raised:* December 1993
Complaining Party: ValuJet Airlines
Complained Against: Delta Air Lines
Description: ValuJet alleged that Delta had instituted a campaign to prevent the new entrant from "getting off the ground." According to ValuJet, after it began operating at Atlanta, Delta sharply reduced its fares in the markets served by ValuJet and expanded its capacity in a number of those markets, including Atlanta-Jacksonville and Atlanta-Memphis.

15. *Date Raised*: August 1993
Complaining Party: MarkAir
Complained Against: Alaska Airlines
Description: MarkAir complained that Alaska was charging below-cost fares in several markets to force MarkAir to exit those markets and weaken MarkAir's ability to compete against Alaska in other markets.

16. *Date Raised*: March 1993
Complaining Party: Reno Air
Complained Against: Northwest Airlines
Description: Reno Air inaugurated service in the summer of 1992 between Reno, Nevada, and West Coast cities. In early 1993, the carrier announced plans to initiate service in the Reno–Minneapolis/St. Paul market. Northwest, which then operated no Reno–Minneapolis/St. Paul flights, soon announced that it would begin operating nonstop flights between Reno and Minneapolis/St. Paul and would enter three of Reno Air's nonstop markets: Reno–Seattle, Reno–Los Angeles, and Reno–San Diego. Northwest matched Reno Air's fares in all markets including Reno Air's Minneapolis/St. Paul–West Coast connecting services. Reno Air complained to both DOT and DOJ.

GATE ACCESS AND AIRPORT IMPEDIMENTS

17. *Date Raised*: April 1999
Complaining Party: AirTran Airlines
Complained Against: Newark International Airport and several airlines

Description: AirTran wanted to start service from Atlanta to Newark International Airport but was unable to obtain any gate facilities for its flights, even though several gates were underused. Although airport officials tried to help AirTran obtain gates, the airlines that had gates available refused to allow AirTran to use them, and the airport thus far had failed to require any airline to provide gates to AirTran.

18. *Date Raised*: November 1998
Complaining Party: Legend Airlines
Complained Against: Dallas–Fort Worth International Airport Board and the City of Fort Worth

Description: Legend, a start-up airline, planned to operate long-haul service from Love Field as permitted by Congressional legislation enacted in 1997. Legend intended to use large aircraft reconfigured to satisfy the maximum passenger capacity restrictions established by that legislation. In its complaint (FAA 16-98-20), Legend alleged that the DFW Board and Fort Worth were attempting to bar Legend from operating at Love Field by filing a state court suit against Dallas, Love Field's owner, that sought to bar Dallas from allowing Legend to operate its proposed flights (the DFW Board and Fort Worth claimed that a 1968 contract between Dallas and Fort Worth required Dallas under state law to limit Love Field service). Legend additionally complained that the DFW Board and Fort Worth were discriminating against Legend by not objecting to services operated by other airlines at Love Field and Alliance Airport, a Fort Worth cargo airport, that also violated the 1968 contract between the cities. FAA dismissed the complaint because it was not within FAA's jurisdiction, since the commitments of Fort Worth and the DFW Board to the FAA covered only their own airports and did not cover Love Field, an airport owned by Dallas. The Department, however, issued orders interpreting federal law which held that Legend's proposed services could not be restricted by Dallas, notwithstanding Fort Worth's contract claims (Orders 98-12-27 and 99-4-13).

19. *Date Raised*: October 1998
    Complaining Party: Colgan Airways
    Complained Against: TWA
    Description: Colgan stated that it was being treated unfairly by TWA at LaGuardia Airport. Colgan had been leasing 12 LaGuardia slots from TWA for an extended period. According to Colgan, TWA recalled six of the leased slots with virtually no notice, so that they could be leased out to another airline. Colgan was not given the opportunity to bid on them or to match the other carrier's offer.

20. *Date Raised*: March 1998
    Complaining Party: AirTran Airlines
    Complained Against: Greater Rochester International Airport
    Description: AirTran said that it operated only one flight per day at Rochester and that nonsignatory airlines were unfairly subjected to increased rental rates, increased landing fees and a $4 facility charge for each passenger travelling in and out of the facility. AirTran contended that this nonsignatory charge was not imposed at other facilities.

21. *Date Raised*: March 1998
    Complaining Party: AirTran Airlines
    Complained Against: New Orleans International Airport
    Description: AirTran contended that the major carriers at New Orleans attempted to amend the facilities lease agreement to the detriment of AirTran, the only new entrant serving New Orleans. According to AirTran the new agreement would have required AirTran and any other new entrant airline to lease all available square footage within the bag make-up area rather than an area proportional to the actual operational needs. AirTran was the only carrier objecting to the change. AirTran said that the revised lease agreement would have increased its costs by $75,000.

22. *Date Raised*: October 1997
    Complaining Party: Kiwi Airlines
    Complained Against: Delta Air Lines and Hartsfield–Atlanta International
    Description: In August 1997, Kiwi was notified by Hartsfield-Atlanta that it would be required to move its gates from D-South concourse

to D-North in order to provide additional space for Delta. Although Kiwi proposed an alternate, lower cost relocation to Hartsfield–Atlanta, it was rejected by the airport. Previously, Kiwi had been required by the airport to move its facilities from Concourse C to Concourse D-South, in order to provide additional space for ASA, Delta's regional affiliate. In addition, Kiwi had earlier surrendered a significant portion of its office space on Concourse D to Delta. The airport then informed Kiwi that it had to relinquish the remainder of its office space to provide an additional break room for Delta's employees. In requiring Kiwi to move, the airport failed to give the carrier adequate lead time to plan the operation, unlike the airport's treatment of other air carriers. Although Delta supposedly needed additional space, with the concurrence of the airport, Delta supposedly held two gates from which it operated no service and another gate from which it operated less service than required.

23. *Date Raised*: October 1997
 Complaining Party: Kiwi Airlines
 Complained Against: Continental Airlines and Newark International Airport
 Description: Until October 1997, Kiwi had subleased space from TWA at Terminal A. In October 1997 Continental purchased the TWA gates (as well as three gates at Terminal A from another carrier). Continental, which already held the majority of gates at Newark, had no operations at Terminal A and purchased the gates for future expansion. After Continental acquired the TWA gates, Continental substantially raised Kiwi's charges for gate use and ground handling services required by Continental's sublease. Kiwi alleged that Continental's acquisition of TWA's gates was an attempt to monopolize Newark with the consent of the Port Authority of New York and New Jersey. Kiwi also contended that the "tie-in" arrangement requiring Kiwi to purchase ground handling services from Continental was a violation of Section 1 of the Sherman Act.

24. *Date Raised*: May 1997
 Complaining Party: Reno Air
 Complained Against: Northwest Airlines and Detroit Wayne County Airport
 Description: Reno Air contended that Northwest and Detroit Wayne County Airport (DTW) colluded to deny Reno Air access to the

DTW domestic terminal even though gate space was available. Reno Air further alleged that DTW, in concert with Northwest, offered gate positions at the more expensive international terminal. When Northwest later needed international gates, it offered Reno Air domestic terminal gate positions in exchange for Reno Air relinquishing its international gates. Reno Air also said that DTW charged Reno Air 150 percent of normal landing fees because Reno Air was not a signatory carrier, although Reno Air had attempted to become a signatory carrier. Reno Air also alleged that Northwest entered the Detroit-Reno market only after Reno Air had indicated that it would serve the market. After Reno Air initiated service, Northwest substantially undercut Reno Air's fares, offered bonus WorldPerks miles for the market and then increased service to become the dominant carrier in the market. Then when Reno Air reduced service in the market, Northwest also reduced service.

25. *Date Raised*: December 1995
Complaining Party: ValuJet Airlines
Complained Against: Delta Airlines
Description: ValuJet complained that Delta preempted ValuJet's efforts to obtain the LaGuardia slots needed for ValuJet to begin operating Atlanta-LaGuardia flights in order to maintain Delta's monopoly in that market. When ValuJet was ready to buy slots from TWA, which wanted to sell slots, Delta outbid ValuJet for the slots. Delta assertedly did not need the slots for its own operations and bought them only to keep ValuJet from obtaining them.

26. *Date Raised*: January 1995
Complaining Party: Spirit Airlines
Complained Against: Northwest Airlines
Description: Spirit stated that Northwest had exclusive use of 51 of the 80 gates at Detroit Metropolitan Airport and partial use of additional gates. Spirit, in contrast, could not obtain adequate gate facilities and so could offer only a limited number of flights in competition with Northwest. Spirit complained that when it attempted to purchase two gates from USAir, Northwest frustrated Spirit's offer for the gates by outbidding it.

OTHER AND COMBINED COMPLAINTS

27. *Date Raised*: November 1998
Complaining Party: Pro Air
Complained Against: Northwest Airlines
Description: Pro Air contended that (1) Northwest had aggressively matched Pro Air's fares in all of the city-pair markets that Pro Air served, including Baltimore–Washington, Newark, Indianapolis, and Philadelphia from Detroit; (2) Northwest increased low-fare capacity in the Pro Air markets and, in some cases, added flight segments; (3) Northwest matched Pro Air's lower changed-reservation fees only in markets Pro Air served; in Pro Air markets, Northwest charged $25, whereas in other markets, Northwest charged $75; (4) Northwest refused to work with Pro Air in developing interline agreements even when such agreements would benefit Northwest passengers, such as during a then-recent Northwest strike; and (5) Northwest might be paying significant commission overrides to travel agents who booked with Northwest on routes in which Pro Air competed.

28. *Date Raised*: March 1995
Complaining Party: Nations Air
Complained Against: USAirways
Description: Nations Air complained that USAir engaged in predatory conduct and "dirty-tricks" to cause Nations Air to exit the Pittsburgh-Philadelphia-Boston markets where USAir had had a monopoly. After Nations Air began operations, USAir allegedly undercut Nations Air's fares. The incumbent airline also used its travel agency override commission programs and related programs to discourage travel agencies from booking customers on Nations Air. In addition, according to Nations Air, USAir discouraged some other firms from doing business with Nations Air, and its pilots at Philadelphia maneuvered their aircraft to block Nations Air flights, delaying the flights and inconveniencing Nations Air's passengers.

29. *Date Raised*: February 1995
Complaining Party: Frontier Airlines
Complained Against: United Airlines
Description: Frontier complained that United used various unfair tactics to undermine Frontier's ability to compete with United in several

Denver markets, particularly on Frontier's Denver–North Dakota routes and including Denver to Billings, Bismarck, Bozeman, Fargo, Minot, and Missoula. Frontier alleged that United unreasonably refused to sign a full ticketing and baggage agreement with Frontier and refused to codeshare with Frontier. Frontier additionally charged that United caused Apollo, the computer reservations system (CRS) controlled by United, to use display criteria that gave Frontier's competitive services a poor display position so that travel agents would be less likely to book Frontier's flights.

30. *Date Raised*: September 1993
    Complaining Party: Nations Air
    Complained Against: Allegheny County
    Description: Nations Air, then an applicant for certificated authority, planned to operate from Allegheny County Airport rather than Pittsburgh International Airport. It complained that the County had violated the antitrust laws by closing the airport and forcing Nations Air to use Pittsburgh International Airport.

31. *Date Raised*: May 1993
    Complaining Party: UltrAir
    Complained Against: Continental Airlines
    Description: UltrAir, a start-up airline that flew from Houston to Los Angeles and New York, complained that Continental, which used Houston as a hub, was trying to force UltrAir out of business. Continental allegedly intimidated travel agencies so they would not book UltrAir, undercut UltrAir's fares, refused to interline, and caused SystemOne, the CRS offered by Continental to travel agencies, to display inaccurate and incomplete information on UltrAir's schedules and fares.

32. *Date Raised*: April 1993
    Complaining Party: Kiwi Airlines
    Complained Against: Continental Airlines
    Description: Kiwi, a start-up airline based at Newark, a Continental hub, complained that Continental took steps to undermine Kiwi's ability to operate successfully. Continental matched or undercut Kiwi's fares, added flights, and probably caused SystemOne, the CRS offered by

Continental to travel agencies, to display inaccurate and incomplete information on Kiwi's services.

COMPLAINTS NOT CONSIDERED BY THE COMMITTEE

I. *Date Raised*: January 1999
Complaining Party: USAirways
Complained Against: United
Description: USAirways' Chairman Stephen Wolf wrote Secretary Slater complaining about United's announced intention to increase service at its Washington Dulles hub by 60 percent following USAirways' announcement to increase its own operations at Dulles. Wolf described United's action as a "visible sign of dominant carrier predatory action . . .," and included comments by a Wall Street analyst that concluded that United's expansion "is about beating US Airways out of Dulles, not about maximizing profits" and that "because United intends to put too much capacity too quickly into these markets, its new flying is unlikely to be profitable." Wolf wrote, "As you know, predatory actions often sacrifice short-term profits to protect dominance." He also maintained that "The unrelenting attempts of the major trunk carriers to undermine the operations and expansion of smaller carriers, both domestically and internationally, is a clear and present danger to free market competition."

II. *Date Raised*: 1998
Complaining Party: A low-fare carrier (requested confidentiality)
Complained Against: American Airlines
Description: The low-fare carrier charged that American engaged in anticompetitive conduct to discourage the low-fare carrier from beginning service that would compete with American's service in one of American's hub markets. After American learned that the low-fare carrier intended to enter the market, American signaled the low-fare carrier that it was also planning to begin flying on the route and announced that it would match all of the low-fare airline's fares.

III. *Date Raised*: October 1998
Complaining Party: United Airlines
Complained Against: Minneapolis–St. Paul International Airport

Description: UAL complained that MSP turned down its request to lease airport Gate 43 to (1) accommodate UAL's existing operations and future expansions of its schedule, and (2) improve the gate location of Great Lakes Aviation Ltd., which, doing business as United Express, was subsidized by DOT for essential air service between Minneapolis–St. Paul and six Midwestern communities.

IV. *Date Raised*: March 20,1996 (Docket: OST-96-1172)

Complaining Party: Alaska Central Express, Inc., Bidzy Ta HotAana, Inc., d/b/a Tanana Air Service, and Yute Air Alaska, Inc.

Complained Against: Warbelow's Air Ventures, Inc., and Hageland Aviation, Inc.

Description: Complainants charged respondents with engaging in joint operations in certain Alaskan markets for the purpose of gaining an unfair advantage in mail tender from the U.S. Postal Service.

Disposition: By Order 96-8-8, the Department dismissed the complaint on the grounds that complainants had failed to provide any evidence that respondents had engaged in activities constituting unfair or deceptive trade practices or unfair methods of competition within the scope of 49 U.S.C. §41712.

V. *Date Raised*: October 1997

Complaining Party: Great Lakes Aviation

Complained Against: Northwest Airlines and the Minneapolis Airport Commission (MAC)

Description: Great Lakes has asserted that it (and other carriers) have been and continue to be routinely denied access to attractive gate and terminal accommodations at Minneapolis Airport. Great Lakes had tried for years to gain access to a gate near United Airlines, its major code-share partner, to allow for the type of easy connections that are part and parcel of codesharing relationships. During a recent round of negotiations with MAC for an improved gate location, according to Great Lakes, MAC said it would first have to check with Northwest before agreeing to anything.

Appendix D
Airport Identification Codes

U.S. commercial service airports are identified by a three-letter code assigned by the International Air Transport Association. Codes for airports mentioned in this report are listed below.

ABQ	Albuquerque International Airport, Albuquerque, New Mexico
ACY	Atlantic City International Airport, Atlantic City, New Jersey
AMA	Amarillo International Airport, Amarillo, Texas
ATL	William B. Hartsfield Atlanta International Airport, Atlanta, Georgia
AUS	Austin Robert Mueller Municipal Airport, Austin, Texas
BDL	Hartford/Springfield Bradley International Airport, Windsor Locks, Connecticut
BHM	Birmingham Airport, Birmingham, Alabama
BIL	Billings Logan International Airport, Billings, Montana
BNA	Nashville Metropolitan Airport, Nashville, Tennessee
BOI	Boise Air Terminal (Gowen Field), Boise, Idaho
BOS	General Edward Lawrence Logan International Airport, East Boston, Massachusetts

BUF	Buffalo International Airport, Buffalo, New York
BUR	Burbank-Glendale-Pasadena Airport, Burbank, California
BWI	Baltimore-Washington International Airport, BWI Airport, Maryland
CAE	Columbia Metropolitan Airport, West Columbia, South Carolina
CHS	Charleston International Airport, Charleston, South Carolina
CLE	Cleveland Hopkins International Airport, Cleveland, Ohio
CLT	Charlotte/Douglas International Airport, Charlotte, North Carolina
CMH	Columbus International Airport, Columbus, Ohio
COS	Colorado Springs Municipal Airport, Colorado Springs, Colorado
CRP	Corpus Christi International Airport, Corpus Christi, Texas
CVG	Cincinnati International Airport, Covington, Kentucky
DAL	Dallas Love Field, Dallas, Texas
DAY	Dayton (James M. Cox) International Airport, Dayton, Ohio
DCA	Ronald Reagan Washington National Airport, Arlington, Virginia
DEN	Denver Stapleton International Airport, Denver, Colorado
DFW	Dallas/Fort Worth International Airport, Dallas–Ft. Worth, Texas
DSM	Des Moines International Airport, Des Moines, Iowa
DTW	Detroit Metropolitan (Wayne County) Airport, Detroit, Michigan
ELP	El Paso International Airport, El Paso, Texas
EWR	Newark International Airport, Newark, New Jersey
FLL	Ft. Lauderdale-Hollywood International Airport, Ft. Lauderdale, Florida
GEG	Spokane International Airport, Spokane, Washington
GRR	Grand Rapids (Kent County) International Airport, Grand Rapids, Michigan
GSO	Piedmont Triad International Airport, Greensboro, North Carolina
GSP	Greenville-Spartanburg Airport, Greer, South Carolina
HNL	Honolulu International Airport, Honolulu, Hawaii

HOU	Houston William P. Hobby Airport, Houston, Texas
IAD	Washington Dulles International Airport, Prince William, Virginia
IAH	Houston Intercontinental Airport, Houston, Texas
ICT	Wichita Mid-Continental Airport, Wichita, Kansas
IND	Indianapolis International Airport, Indianapolis, Indiana
ISP	Ronkonkoma (Long Island) MacArthur Airport, Islip, New York
JAX	Jacksonville International Airport, Jacksonville, Florida
JFK	John F. Kennedy International Airport, Jamaica, New York
LAS	Las Vegas McCarran International Airport, Las Vegas, Nevada
LAX	Los Angeles International Airport, Los Angeles, California
LBB	Lubbock International Airport, Lubbock, Texas
LGA	New York LaGuardia Airport, Flushing, New York
LGB	Long Beach Airport (Daugherty Field), Long Beach, California
LIT	Little Rock Regional Airport, Little Rock, Arkansas
MAF	Midland International Airport, Midland, Texas
MCI	Kansas City International Airport, Kansas City, Missouri
MCO	Orlando International Airport, Orlando, Florida
MDW	Chicago Midway Airport, Chicago, Illinois
MEM	Memphis International Airport, Memphis, Tennessee
MHT	Manchester Airport, Manchester, New Hampshire
MIA	Miami International Airport, Miami, Florida
MKE	Milwaukee General Mitchell International Airport, Milwaukee, Wisconsin
MSN	Madison (Dane County) Regional Airport (Truax Field), Madison, Wisconsin
MSP	Minneapolis-St. Paul International Airport (Wold-Chamberlain Field), St. Paul, Minnesota
MSY	New Orleans International Airport, New Orleans, Louisiana
OAK	Oakland International Airport, Oakland, California
OKC	Oklahoma City Will Rogers World Airport, Oklahoma City, Oklahoma
OMA	Omaha Eppley Airfield, Omaha, Nebraska
ONT	Ontario International Airport, Ontario, California

ORD	Chicago-O'Hare International Airport, Chicago, Illinois
ORF	Norfolk International Airport, Norfolk, Virginia
PBI	Palm Beach International Airport, West Palm Beach, Florida
PDX	Portland International Airport, Portland, Oregon
PHL	Philadelphia International Airport, Philadelphia, Pennsylvania
PHX	Phoenix Sky Harbor International Airport, Phoenix, Arizona
PIE	St. Petersburg International Airport, St. Petersburg, Florida
PIT	Pittsburgh International Airport, Pittsburgh, Pennsylvania
PVD	Providence Theodore Francis Green State Airport, Warwick, Rhode Island
PWM	Portland International Jetport, Portland, Maine
RDU	Raleigh-Durham Airport, Morrisville, North Carolina
RIC	Richmond International Airport (Byrd Field), Richmond, Virginia
RNO	Reno Cannon International Airport, Reno, Nevada
ROC	Rochester International Airport, Rochester, New York
SAN	San Diego International Airport (Lindbergh Field), San Diego, California
SAT	San Antonio International Airport, San Antonio, Texas
SDF	Louisville Standiford Field, Louisville, Kentucky
SEA	Seattle-Tacoma International Airport, Seattle, Washington
SFO	San Francisco International Airport, San Francisco, California
SJC	San Jose International Airport, San Jose, California
SLC	Salt Lake City International Airport, Salt Lake City, Utah
SMF	Sacramento Metropolitan Airport, Sacramento, California
SNA	Santa Ana (Orange County) John Wayne Airport, Santa Ana, California
SRQ	Sarasota-Bradenton Airport, Sarasota, Florida
STL	St. Louis–Lambert International Airport, St. Louis, Missouri
SYR	Syracuse Hancock International Airport, Syracuse, New York
TPA	Tampa International Airport, Tampa, Florida
TUL	Tulsa International Airport, Tulsa, Oklahoma
TUS	Tucson International Airport, Tucson, Arizona
TYS	Knoxville McGhee Tyson Airport, Alcoa, Tennessee