January 14, 2012

Dayton Lehman Principal Deputy Assistant General Counsel Aviation Enforcement & Proceedings Department of Transportation by email

RE: American Airlines falsely presenting prices that are not actually available, neither on a one-way basis nor on a round-trip basis

Mr. Lehman,

In the course of preparing my letter to you on the subject of carrier-imposed surcharges falsely described as "tax," I uncovered American Airlines falsely presenting prices that are not actually available, neither on a one-way basis nor on a round-trip basis.

Attachments 1 shows a standard screen in the current AA.COM booking process for a simple coach round-trip BOS-LHR-BOS. Note the remarkable fare of \$41 offered in Attachment 1 as the purported "Departure Fare" for BOS-LHR. But then the LHR-BOS fare is the much higher \$458 (Attachment 2), yielding a round-trip fare of \$489. The resulting quote is \$489 of "fare" plus \$196.10 of "taxes & fees" (Attachment 3). AA's quote specifically reaffirms that the "Departure Fare" is "\$41" while the "Return Fare" is, AA says, \$458.

Why the large jump in fare between the outbound and the return? A reasonable consumer might worry that the return date of travel is a peak day and search for a lower-priced return. Any such search would be in vain; LHR-BOS fares are quoted at \$400+ on all other days. Meanwhile, a consumer seeking to fly LHR-BOS-LHR is quoted just \$57 (Attachment 4) on the same LHR-BOS segment that AA priced at \$458 to the BOS-originating passenger (Attachment 2).

I believe these price quotes result from AA.COM's misleading and deceptive treatment of its carrierimposed fuel surcharge. Inexplicably, AA is adding the entire surcharge to the return fare component, causing the outbound fare to be quoted at a far lower amount than the consumer's actual payment to AA for that segment.

I believe AA's pricing behavior, as detailed herein, violates DOT requirements for truthful airfare advertising. AA's representation of a "\$41" fare BOS-LHR is simply not accurate; that amount improperly excludes carrier-imposed surcharges, and AA does not actually offer travel BOS-LHR for \$41 on a one-way basis or a round-trip basis. I credit that small type on AA.COM (middle of Attachment 1) says "additional taxes and fees will apply," but I believe carrier-imposed surcharges may not permissibly be excluded or disclaimed in this way. I believe the practices described herein apply to transatlantic and transpacific flights quoted at AA.COM for travel on by AA as well as on AA's codeshare flights on BA, IB, JL, CX, and perhaps others.

Consumers are harmed by AA's misrepresentations as detailed herein. A consumer seeing the low \$41 price on outbound travel is induced to seek, in vein, for a comparable return flight. A consumer who flies the outbound segment and later seeks to refund, change or cancel the return segment rightly expects a large residual value to be provided as a refund or credit for future travel, but in fact such a consumer will find such value unavailable.

In attempting to think through consumer response to the AA practices detailed herein, I asked myself why AA puts the entire carrier-imposed surcharge in the *return* component of a round-trip. What would happen if the entire carrier-imposed surcharge was instead placed in the outbound component? This question reveals the reason or AA's approach: Putting the entire surcharge in the outbound component would scare consumers away – inducing consumers to look elsewhere, since it would seem AA has an unreasonably high fare. Thus, we see the importance of intermediate fare quotes in influencing consumer behavior – and correspondingly, we see the deceptiveness of the approach AA has chosen.

I appreciate your attention to this matter, and I would be pleased to assist further to the extent of my ability. Please let me know if I can be of service.

Regards,

Benjamin Edelman

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