

Department of Transportation
Office of Aviation Enforcement and Proceedings

)	
)	
British Airways)	February 4, 2013
)	
Multiple Price Advertising Violations of)	
49 U.S.C. § 41712 and 14 CFR 399.84(a))	
)	
-----)	

British Airways charges fuel surcharges of amounts impermissible under DOT rules, fails to disclose these surcharges in the manner required by DOT rules and, for certain around-the-world tickets, misrepresents fuel surcharges as “tax.”

I hereby request that DOT docket this complaint as a request for DOT to exercise its authority under 49 USC 41712 to investigate and impose sanctions on British Airways for the unfair and deceptive practices described herein.

British Airways Fuel Surcharges Do Not Represent a Reasonable Estimate of Per-Passenger Fuel Costs Above Any Plausible Baseline

The DOT requires that “When a cost component is described as a fuel surcharge ... that amount must actually reflect a reasonable estimate of the per-passenger fuel costs incurred by the carrier above some baseline calculated based on such factors as the length of the trip, varying costs of fuel, and number of flight segments involved.” The DOT instructs airlines to accompany any such fuel surcharge disclosure with an explanation of the method of calculation: “For example, descriptions such as the following would be acceptable: ‘Fare includes a fuel surcharge. On average our passengers paid \$xx.xx more for fuel during 2011 in their ticket price than they did in 2000;’ or ‘Fares include a charge for fuel. On average in 2011 our passengers paid \$xx.xx for fuel as a part of their ticket price.’ Of course, such assertions must be based on the carrier’s actual paid enplanements and fuel expenditures.” See Additional Guidance on Airfare/Air Tour Price Advertisements (available at <http://airconsumer.dot.gov/rules/Notice.Taxes.fees.sam.dl.13.website.pdf>).

In May 2012, I booked BA OnBusiness award travel from Singapore to Boston. At that time, BA quoted “fuel surcharge” of \$521 for first class travel SIN-LHR-BOS. See Attachments 1 and 2 (prepared May 30, 2012).

Current BA fuel surcharges for BOS-LHR are \$229 per person each way (for coach and World Traveler Plus) and \$414 each way (for Business Class and First Class). See Attachments 3 and 4 (prepared January 12, 2013).

To the best of my knowledge, these amounts are not a reasonable estimate of the per-passenger fuel cost incurred by British Airways above any reasonable baseline. While fuel prices are high, they are *stable* and have not been increasing significantly over recent years. See Attachment 5, taken from the IATA Economics web site, showing stable fuel prices over the past two years, and prices consistently well below the peak of 2008.

British Airways Fuel Surcharges Are Implausibly High Vis-à-vis Ordinary Paid Tickets

For further evidence that BA fuel surcharges are not a reasonable estimate of per-passenger fuel costs above a baseline, I checked ordinary paid bookings on BA flights. I quickly found instances in which the BA “fuel surcharge” exceeded 70% of the total cost of an ordinary paid ticket. For example, on January 20, 2013, I used the BA web site to quote an ordinary paid coach ticket for BOS-LHR-BOS at \$640 plus government taxes of \$218.85. See Attachment 6. In contrast, when I asked to redeem points for the same flights on the same dates, the BA Executive Club and OnBusiness redemption tools noted the required points plus \$458 of British Airways fuel surcharge and government taxes of \$218.85. See Attachment 7.

It is not plausible that $\$458/\$640=71.5\%$ of total airfare is fuel cost above a baseline. This confirms that the British Airways “fuel surcharge” does not reflect a reasonable estimate of per-passenger fuel costs above a baseline.

British Airways Fuel Surcharges Appear to Exceed BA’s Actual Cost of Fuel

As best I can determine from publicly-available sources, BA fuel surcharges currently exceed BA’s actual cost of fuel. To make this calculation, I checked capacity, fuel surcharges, and fuel consumption on BOS-LHR and LHR-LAX. This combination of routes offers both transatlantic directions, BA’s two prevailing equipment types, and a mix of shorter and longer transatlantic routes. The table below summarizes my calculations:

	<u>BOS-LHR (777 service)</u>	<u>LHR-LAX (747 service)</u>
<u>Fuel surcharge revenue</u>		
<u>Passengers</u>		
First Class	16 * \$414 = \$6,624	14 * \$452 = \$6,328
Club	48 * \$414 = \$19,872	52 * \$452 = \$23,504
World Traveler Plus	40 * \$229 = \$9,160	36 * \$229 = \$8,244
World Traveler	122 * \$229 = \$27,938	243 * \$229 = \$55,647
<u>Total passenger fuel surcharge</u>	\$63,594	\$93,723
<u>Cargo</u>		
Capacity	35,000 kg	34,000 kg
Fuel surcharge	\$1.16/kg	\$1.16/kg
<u>Total cargo fuel surcharge</u>	\$40,600	\$39,440
<u>Total fuel surcharge revenue</u>	\$104,194	\$133,163
<u>Fuel expense</u>		
Scheduled travel time	6:20	10:10
Fuel consumption per hour	7,600 liters/hour	12,788 liters/hour
Price of jet fuel	\$0.766/liter	\$0.766/liter

Total fuel expense

\$36,870

\$99,589

Notice that total fuel surcharge revenue for these routes is \$104,194 and \$133,163, respectively. In contrast, total fuel expense is less, specifically \$36,870 and \$99,589. This indicates that fuel surcharge revenue appears to exceed BA's actual cost of fuel.

BA may argue that my fuel surcharge revenue estimates should be adjusted in light of the passenger and cargo load factors. I have not fully evaluated that argument. But even such an adjustment would not alter the conclusion that BA's fuel surcharges are not a reasonable estimate of increased fuel costs above a baseline. Specifically, BA parent IAG publicly reports its transatlantic passenger load factor as 83.7% and its systemwide cargo load factor as 73.9%. After these adjustments, fuel surcharge revenue would be \$83,231 and \$107,592, respectively – still exceeding fuel expense. Note that lower passenger load would increase cargo capacity, a factor I have not considered in this analysis.

Sources:

Passenger capacity: http://www.britishairways.com/travel/seatfirst/public/en_gb,
http://www.britishairways.com/travel/seatcwf/public/en_gb,
http://www.britishairways.com/travel/wldtrv/public/en_gb,
http://www.britishairways.com/travel/worldt/public/en_gb

Passenger load factor: <http://www.iagshares.com/External.File?t=2&item=g7rqBLVLuv81UAmrh20Mp62KWtmRe7AmP/iMDLh25hI4zE5OYGrQfWoB2EgXqxb2ah4NeTcmQYr4rQQVIYYQDQ==> (at heading Passenger Load Factor % - North America - Year To Date 2012)

Cargo capacity: Calculated as follows:

$$\begin{aligned}\text{Cargo Capacity} &= \text{Payload} - \text{Passenger Weight} \\ &= (\text{Zero Fuel Weight} - \text{Operating Weight}) \\ &\quad - (\text{Passenger Capacity} * \text{Weight Per Passenger})\end{aligned}$$

Operating weight and zero fuel weight obtained from

http://www.boeing.com/commercial/airports/acaps/777_23.pdf and
http://www.boeing.com/commercial/airports/acaps/747_4.pdf for the equipment types, engine types, and maximum ratings BA operates (as listed on the BA pages noted in the fuel consumption sources, below). Passenger weight calculated at 95kg per passenger, times 100% passenger load in all cabins. Cargo capacity rounded down to the next 1000kg. We also confirmed that payload plus zero fuel weight plus required fuel would not exceed max takeoff weight.

Cargo surcharge amount: <http://www.baworldcargo.com/surcharges/>

Travel times: SABRE (reporting scheduled times, not flight times)

Fuel consumption: <http://web.archive.org/web/20030408042829/http://www.britishairways.com/flights/factfile/airfleet/docs/777.shtml>, <http://web.archive.org/web/20030223055148/http://www.britishairways.com/flights/factfile/airfleet/docs/7474.shtml>

Fuel cost: <http://www.transtats.bts.gov/fuel.asp> (2012 YTD figures)

British Airways Fuel Surcharges Are Not Supported with Required Calculations

The DOT has instructed that airlines must substantiate fuel surcharges with statements supporting the surcharge amounts. Specifically, the DOT instructs: “For example, descriptions such as the following would be acceptable: ‘Fare includes a fuel surcharge. On average our passengers paid \$xx.xx more for fuel during 2011 in their ticket price than they did in 2000;’ or ‘Fares include a charge for fuel. On average in 2011 our passengers paid \$xx.xx for fuel as a part of their ticket price.’” See Additional Guidance on Airfare/Air Tour Price Advertisements (available at <http://airconsumer.dot.gov/rules/Notice.Taxes.fees.sam.dl.13.website.pdf>).

To the best of my knowledge, BA has never provided any such substantiation. For example, when BA quotes a ticket that includes a fuel surcharge, BA generally labels the fuel surcharge as such, but BA never provides the sort of calculation specified in the DOT notice.

Nor are details easily available from BA staff. Indeed, when I wrote to British Airways customer service (via the BA web site) seeking information about the calculation of fuel surcharges, I was referred to telephone staff. (See Attachment 8.) I called BA telephone reservations staff but was unable to obtain any information on this subject.

BA OnBusiness Points Table Does Not Disclose Carrier-Imposed Surcharges

The DOT requires that “If there are government fees or taxes or mandatory carrier charges such as processing fees that must be paid by consumers in frequent-flyer awards programs, then the respective amounts or a range of those amounts must be shown on carrier websites together with the mileage award levels. They must, moreover, be given the same prominence as the mileage award requirements.” See Guidance on the Use of the Term ‘Free’ in Air Fare Advertisements and Disclosure of Consumer Costs in Award Travel (available at <http://airconsumer.dot.gov/rules/Use%20of%20the%20word%20free%20in%20fare%20advertisements.pdf>).

In sharp contrast to the DOT’s requirements, the OnBusiness Reward Flight Points Page (Attachment 9) lists points required for various awards without putting fuel surcharges in equal prominence. The body of the table says nothing about any surcharges. Rather, a tiny footnote marker directs a user to a note mentioning only “taxes, fees, charges, and security charges.” This footnote suffers multiple deficiencies vis-à-vis DOT requirements: 1) The small type at the far bottom of the lengthy page does not have “the same prominence” as the full-size points requirements present throughout the page. 2) The footnote mentions “fees” and “charges” but says nothing of “carrier-imposed fuel surcharges” (BA’s own characterization of the amounts at issue). 3) The footnote does not indicate the amounts or range of amounts that may apply.

Impermissible Combination of Government-Imposed Taxes and Fees with BA Fees

The DOT warns that “Combining government-imposed taxes and fees with those imposed by carriers or agents is likely to confuse consumers and deceive them into believing the government taxes and fees associated with their airfare are higher than they actually are.” The DOT instructs that “advertisers who desire to separately list government taxes and fees as well as carrier- or agent-imposed fees should ensure that they are not lumped together and described as ‘taxes and fees.’ Language such as ‘Taxes

and carrier-imposed fees’ would be acceptable, for example.” See Additional Guidance on Airfare/Air Tour Price Advertisements (available at <http://airconsumer.dot.gov/rules/Notice.Taxes.fees.sam.dl.13.website.pdf>).

As I booked recent BA OnBusiness award travel, the British Airways site presented the label “taxes, fees, charges and surcharges per person” with a footnote mentioning “The price of your ticket may include a fuel surcharge per flight levied by the carrier.” (See Attachment 1.) This disclosure does not satisfy DOT rules. In particular, contrary to the DOT’s instructions, this disclosure omits the crucial words “carrier-imposed” – words necessary to alert consumers that these surcharges are set by BA, in sharp contrast to genuine taxes and fees imposed by governments and airports. The footnote is also inadequate because the DOT instructs that this information is to be provided in the main disclosure (not in the footnote) and because the footnote is impermissibly vague (referencing fees that “may” apply, which lacks the required level of specificity).

Ongoing Misrepresentation by Around-The-World Booking of Carrier-Imposed Surcharges as “Tax” – for Tickets Issued by BA

BA advertises around-the-world air travel via the tool at <http://rtw.oneworld.com/> . This tool systematically mischaracterizes carrier-imposed surcharges as “tax.” These amounts can be substantial – regularly more than \$1000 on a single ticket, and I believe in some instances more than \$2000.

If a passenger chooses an itinerary with the first segment on BA, BA charges the customer’s credit card and issues the entire ticket. See <http://www.oneworld.com/flights/plan-book-online/?faqOnly=1> at heading “FAQ” – “Who is my ticketing airline?”

I have quoted a variety of around-the-world tickets using this tool. For example, on January 20, 2013, I quoted a coach ticket JFK-LHR-DXB-LHR-ARN-LHR-HKG-SIN-NRT-HKG-YVR with the first five segments on BA. Taxes were quoted at \$1,191.24 USD. See Attachment 10. I clicked the “Proceed” button and received the lengthy itinerary and fare quote shown in Attachment 11, reiterating the \$1,191.24 quote of “Taxes.” There, the word “Taxes” appeared as a hyperlink. I clicked this link, receiving the itemization in Attachment 12. The top two lines of that itemization report “Surcharge” of \$579 and “Multiple surcharges” of \$367.

However, as best I can tell there are no actual government taxes totaling the \$1,191.24 “tax” charged on this itinerary. Rather, I believe the majority of the \$1,191.24 “tax” – specifically, the \$579 and \$367 later characterized as “surcharge” – are actually carrier-imposed surcharges. Thus, 79.4% of the \$1,191.24 “tax” is not actually tax but rather carrier-imposed surcharge.

Crucially, the initial disclosures (as shown in Attachments 10 and 11) mischaracterize the amounts at issue as “taxes”, not “taxes and surcharges” or the like. Moreover, every user using this booking tool must see the screens in Attachments 10 and 11; in contrast, the information in Attachment 12 is shown only if users specifically click the “Taxes” hyperlink to view details. Thus, even though Attachment 12 describes the surcharges within a page entitled “taxes and surcharges information”, most users are unlikely to see this screen. Moreover, the “and surcharges” label appears only in HTML title, not in page text – insufficiently prominent to cure the false statements made previously. Indeed, at the same time that the “taxes and surcharges” label appears at the top of the page (indicating that some of the listed

charges are “surcharges” rather than taxes), the wording “TaxBreakdownPopUp” appears immediately below (in the popup’s URL bar) (indicating that everything in the listing is a “tax”). Finally, even on the most favorable view, the statements in Attachment 12 still fall short of applicable DOT rules: Note the absence of the crucial words “carrier-imposed” as well as the failure to include statements substantiating the surcharge amounts (“On average our passengers paid...” or similar). These omissions are in sharp contrast to the requirements of Additional Guidance on Airfare/Air Tour Price Advertisements (<http://airconsumer.dot.gov/rules/Notice.Taxes.fees.sam.dl.13.website.pdf>).

My Attempts to Alert British Airways to These Violations

I have attempted to alert British Airways to these violations and obtain a refund of amounts unlawfully charged to me. I sent substantially the same material presented above (with the exclusion of the Around-the-World section) to BA Customer Relations by fax on June 7, 2012, then again on July 23, 2012. On November 8, 2012, I took the liberty of escalating this matter to Richard Mendles, BA General Counsel, Americas. Mr. Mendles replied in an email of November 14, 2012 to confirm receipt. Despite two further messages from me seeking a response in substance, he has offered no substantive reply. Thus, British Airways has failed to reply in substance despite the passage of more than seven months since I first brought these matters to its attention.

Required Resolution

I ask that the Department of Transportation:

- (1) Exercise its authority under 49 USC 41712 to open an investigation of British Airways for having engaged in, and continuing to engage in, the unfair or deceptive practices described above;
- (2) Order British Airways to refund to ticket purchasers all monies represented to ticket purchasers as "taxes" or government-imposed fees, but not actually remitted to governments, and all “fuel surcharges” impermissible under the law or regulation applicable as of the date of purchase of the corresponding tickets;
- (3) Impose appropriate civil penalties on British Airways;
- (4) Refer this matter to appropriate US and foreign tax collection agencies for investigation of possible tax fraud or other violations of tax law in non-payment to governments of monies collected as “taxes” or government-imposed fees; and
- (5) Issue any guidance or revised regulations needed to clarify to other airlines and ticket agents, and to preclude any future claim of ambiguity, that these practices are unfair and deceptive in violation of 49 USC 41712.

Submitted February 4 2013,

/s/

Benjamin Edelman

Attachment 1

The screenshot shows the British Airways website interface for booking with On Business Points. The page title is "Book with On Business Points". A progress bar indicates the current step is "Price", with other steps being "Dates", "Flights", "Passengers", "Payment", and "Confirmation".

Your price quote Your points: **79440**

Price	
Points	59940
Inclusive total	\$ 1,236.46

Price breakdown			
	Points	Taxes, fees, charges and surcharges* per person	Inclusive total
2 Adult	29970	\$ 618.23	\$ 1,236.46
Total	59940 Points	+	\$ 1,236.46

* The price of your ticket may include a fuel surcharge per flight levied by the carrier.

[More details](#)
[Conditions of carriage](#)

Details of your baggage allowance and any applicable charges are lower down this page

About your flights

Your flights

Outbound - Monday 4 June 2012

Attachment 2

The screenshot shows the "Charges applied to your flight" page on the British Airways website. It provides a detailed breakdown of taxes, fees, and surcharges applied to the booking.

Charges applied to your flight

There are certain taxes, fees and charges that are applied to your booking by British Airways, airport operators, governments or other authorities. Here you will find a full breakdown and explanation of the taxes, fees and surcharges applied to your booking.

Government, authority and airport charges	Per adult
Customs User Fee - USA	USD 5.50
Transportation Tax(Arrival) - USA	USD 16.70
Animal & Plant Health User Fee (Aphis) - USA	USD 5.00
Immigration User Fee - USA	USD 7.00
Passenger Service Charge - Singapore	USD 10.95
Aviation Tax - Singapore	USD 4.81
Passenger Security Service Charge - Singapore	USD 6.30
Passenger Service Charge - United Kingdom	USD 40.97
Total government, authority and airport charges*	USD 97.23

[More information](#)

British Airways fees and surcharges	Per adult
Fuel Surcharge**	USD 521.00
Total British Airways fees and surcharges	USD 521.00

[More information](#)

Total taxes, fees and surcharges per person **USD 618.23**

BRITISH AIRWAYS

Book with Avios points

> Home

- 1 Dates
- 2 Flights
- 3 Price
- 4 Passengers
- 5 Payment
- 6 Confirmation

Your price quote

Your Avios: **102576**

Avios price options

- 20000 Avios + \$ 253.20**
- 18000 Avios + \$ 283.20
- 16000 Avios + \$ 308.20
- 14000 Avios + \$ 333.20
- 12000 Avios + \$ 358.20
- 10000 Avios + \$ 383.20

Price breakdown

	Avios per person	Price per person	Taxes, fees and carrier charges*	Inclusive total
1 Adult	20000	\$ 0.00	\$ 253.20	\$ 253.20
Total	20000 Avios + \$ 253.20			

* The price of your ticket may include a fuel surcharge per flight levied by the carrier.

> More details
> Conditions of carriage

About your booking

Your flights

Outbound - Tue 15 Oct

08:15	19:15
15 Oct	15 Oct

Your baggage allowance

Checked baggage
Adults and children

- There are no weight restrictions for checked baggage.
- You may check up to 2 pieces of baggage.

> British Airways baggage rules
> Baggage calculator

More information about your flight

Logan International to Heathrow (London)

HELP CHILDREN TRAVEL

Charges applied to your flight

There are certain taxes, fees and charges that are applied to your booking by British Airways, airport operators, governments or other authorities. Here you will find a full breakdown and explanation of the taxes, fees and surcharges applied to your booking.

Government, authority and airport charges	Per adult
Transportation Tax (Departure) - USA	USD 17.20
Passenger Civil Aviation Security Service Fee - USA	USD 2.50
Passenger Facility Charge	USD 4.50
Total government, authority and airport charges*	USD 24.20
> More information	

British Airways fees and surcharges	Per adult
Fuel Surcharge**	USD 229.00
Total British Airways fees and surcharges	USD 229.00
> More information	

Total taxes, fees and surcharges per person	USD
253.20	

* Government and/or airport taxes are refundable, however some countries will apply a Value Added Tax, Sales Tax or equivalent, which will only be refunded on fully flexible tickets.
 ** In line with the fare rules, a refund of fuel surcharge can be made on fully flexible tickets only with unused flights in your itinerary.

Close

Attachment 4

Firefox

Itinerary and Quote

British Airways plc (GB) | https://www.britishairways.com/travel/redeem/execclub/_gf/en_gb?eld=100005

Book with Avios points

> Home

1 Dates 2 Flights 3 Price 4 Passengers 5 Payment 6 Confirmation

Your price quote

Your Avios: **102576**

Avios price options

- 60000 Avios + \$ 438.20**
- 54000 Avios + \$ 558.20
- 45000 Avios + \$ 728.20
- 36000 Avios + \$ 903.20
- 30000 Avios + \$ 1,018.20

Price breakdown

	Avios per person	Price per person	Taxes, fees and carrier charges* per person	Inclusive total
1 Adult	60000	\$ 0.00	\$ 438.20	\$ 438.20
Total	60000 Avios + \$ 438.20			

* The price of your ticket may include a fuel surcharge per flight levied by the carrier.

> More details

> Conditions of carriage

Details of your baggage allowance and any applicable charges are lower down this page

About your flights

Your flights

Outbound - Tuesday 15 October 2013

✈	08:15 15 Oct	19:35 15 Oct	Logan International (MA)	Heathrow (London)	BA0238 British Airways	First
---	-----------------	-----------------	--------------------------	-------------------	---------------------------	-------

Your baggage allowance

Checked baggage

Adults and children

- There are 2 checked bags
- You may also have 1 cabin bag

> British Airways baggage allowance

More information

Logan International to Heathrow (London)

HELP CHILDREN

Flying Start, in support of

Charges applied to your flight

There are certain taxes, fees and charges that are applied to your booking by British Airways, airport operators, governments or other authorities. Here you will find a full breakdown and explanation of the taxes, fees and surcharges applied to your booking.

Government, authority and airport charges	Per adult
Transportation Tax (Departure) - USA	USD 17.20
Passenger Civil Aviation Security Service Fee - USA	USD 2.50
Passenger Facility Charge	USD 4.50
Total government, authority and airport charges*	USD 24.20

> More information

British Airways fees and surcharges	Per adult
Fuel Surcharge**	USD 414.00
Total British Airways fees and surcharges	USD 414.00

> More information

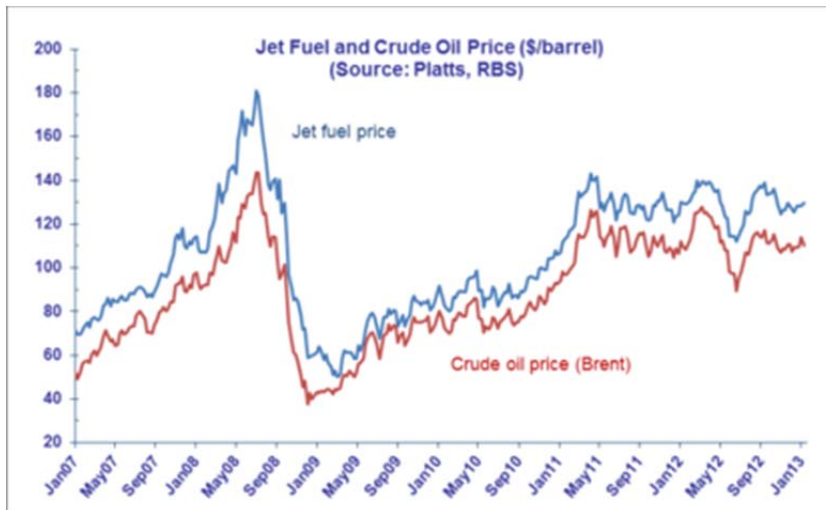
Total taxes, fees and surcharges per person	USD 438.20
--	-------------------

*Government and/or airport taxes are refundable, however some countries will apply a Value Added Tax, Sales Tax or equivalent, which will only be refunded on fully flexible tickets.

**In line with the fare rules, a refund of fuel surcharge can be made on fully flexible tickets only with unused flights in your itinerary.

Attachment 5

IATA Economics: Jet Fuel Price Development





Source: <http://www.iata.org/publications/economics/fuel-monitor/Pages/price-development.aspx>

Attachment 6

Firefox - British Airways - Price quote

British Airways plc (GB) | https://www.britishairways.com/travel/fx/public/en_us?eld=111011×tamp=012010

BRITISH AIRWAYS   Buy travel

> Home

1 Dates 2 Flights 3 Price 4 Passengers 5 Payment 6 Confirmation

✈ **Flight:** Departing Logan International (MA), 4 Mar 2013

Total price to pay (US Dollars, USD, \$) **\$ 858.85**

> Got a promotion code or eVoucher?

Details of your baggage allowance and any applicable charges are lower down this page

Check your flight itinerary details

→ **Outbound - Monday 4 Mar, 2013**

✈ 08:00 4 Mar	✈ 19:25 4 Mar	Logan International (MA)	Heathrow (London)	BA0238 British Airways	World Traveller
------------------	------------------	--------------------------	-------------------	----------------------------------	-----------------

← **Inbound - Monday 11 Mar, 2013**

✈ 09:55 11 Mar	✈ 13:50 11 Mar	Heathrow (London)	Logan International (MA)	BA1502 American Airlines	Economy
-------------------	-------------------	-------------------	--------------------------	------------------------------------	---------

\$ 858.85

Email price quote

Currency calculator

Change flights

Price breakdown



Passenger	Fare	Taxes, fees and carrier charges per person	Total price**
1 Adult	\$ 182.00	\$ 676.85	\$ 858.85

** The inclusive total of your ticket includes a fuel surcharge per flight levied by the carrier.

> More details

Tax Breakdown - Mozilla Firefox

British Airways plc (GB) | https://www.britishairways.com/travel/fx/public/en_us?eld=111082

BRITISH AIRWAYS  

Charges applied to your flight

There are certain taxes, fees and charges that are applied to your booking by British Airways, airport operators, governments or other authorities. Here you will find a full breakdown and explanation of the taxes, fees and surcharges applied to your booking.

Government, authority and airport charges	Per adult
Customs User Fee - USA	USD 5.50
Transportation Tax (Departure) - USA	USD 17.20
Transportation Tax (Arrival) - USA	USD 17.20
Animal & Plant Health User Fee (Aphis) - USA	USD 5.00
Immigration User Fee - USA	USD 7.00
Passenger Civil Aviation Security Service Fee - USA	USD 2.50
Air Passenger Duty - United Kingdom	USD 104.50
Passenger Service Charge - United Kingdom	USD 55.45
Passenger Facility Charge	USD 4.50
Total government, authority and airport charges*	USD 218.85

> More information

British Airways fees and surcharges	Per adult
Fuel Surcharge**	USD 458.00
Total British Airways fees and surcharges	USD 458.00

> More information

Total taxes, fees and surcharges per person	USD
676.85	

*Government and/or airport taxes are refundable, however some countries will apply a Value Added Tax, Sales Tax or equivalent, which will only be refunded on fully flexible tickets.

**In line with the fare rules, a refund of fuel surcharge can be made on fully flexible tickets only with unused flights in your itinerary.

economy cabin ensures you'll arrive in better shape.

> Information about World Traveller Plus

Attachment 7

Firefox

Itinerary and Quote

British Airways plc (GB) https://www.britishairways.com/travel/redeem/execclub/_gf/en_us?eld=100005

Book with Avios points

Home

1 Dates 2 Flights 3 Price 4 Passengers 5 Payment 6 Confirmation

Your price quote

Your Avios: 102576

Avios price options

- ☒ 40000 Avios + \$ 676.85
- ☐ 36000 Avios + \$ 736.85
- ☐ 32000 Avios + \$ 786.85
- ☐ 28000 Avios + \$ 836.85
- ☐ 24000 Avios + \$ 886.85
- ☐ 20000 Avios + \$ 936.85

Price breakdown

	Avios per person	Price per person	Taxes, fees and carrier charges* per person	Inclusive total
1 Adult	40000	\$ 0.00	\$ 676.85	\$ 676.85
Total	40000 Avios + \$ 676.85			

* The price of your ticket may include a fuel surcharge per flight levied by the carrier.

[More details](#)

[Conditions of carriage](#)

Details of your baggage allowance and any applicable charges are lower down this page

Tax Breakdown - Mozilla Firefox

British Airways plc (GB) https://www.britishairways.com/travel/redeem/execclub/_gf/en_us?eld=100132

Charges applied to your flight

There are certain taxes, fees and charges that are applied to your booking by British Airways, airport operators, governments or other authorities. Here you will find a full breakdown and explanation of the taxes, fees and surcharges applied to your booking.

Government, authority and airport charges	Per adult
Air Passenger Duty - United Kingdom	USD 104.50
Animal & Plant Health User Fee (Aphis) - USA	USD 5.00
Passenger Civil Aviation Security Service Fee - USA	USD 2.50
Immigration User Fee - USA	USD 7.00
Transportation Tax(Arrival) - USA	USD 17.20
Customs User Fee - USA	USD 5.50
Transportation Tax(Departure) - USA	USD 17.20
Passenger Service Charge - United Kingdom	USD 55.45
Passenger Facility Charge	USD 4.50
Total government, authority and airport charges*	USD 218.85

[More information](#)

British Airways fees and surcharges	Per adult
Fuel Surcharge**	USD 458.00
Total British Airways fees and surcharges	USD 458.00

[More information](#)

Total taxes, fees and surcharges per person	USD 676.85
--	-------------------

[Easier check-in online or using Self-Service Check-in kiosks](#)

Attachment 8

From: British Airways North America [REDACTED]
Sent: Wednesday, June 06, 2012 3:01 AM
To: [REDACTED]
Subject: I write in regard to tickets [REDACTED] and [REDACTED] for OnBusiness aw...
[Incident: [REDACTED]]

Subject

I write in regard to tickets [REDACTED] and [REDACTED] for OnBusiness aw...

Response Via Email (Amey)

06/06/2012 07.00 AM (GMT)

Dear Mr Edelman

I am sorry we are unable to help about your fuel surcharge query by email.

For assistance, please contact your nearest British Airways office, where one of our agents will be able to assist you. Their telephone numbers and opening times can be found at:

<http://www.britishairways.com/travel/ctclist>

I hope they resolve this swiftly for you.

Regards

Amey

British Airways

...

Customer By Web Form (Benjamin Edelman)

05/06/2012 10.20 PM (GMT)

I write in regard to tickets [REDACTED] and [REDACTED] for OnBusiness award travel from Singapore to Boston.

I notice that these tickets include a British Airways fee of \$521 described as a "fuel surcharge." How was that amount calculated? Does that reflect the cost of fuel relative to a particular baseline? What is the method of calculation of the baseline? I could not find this information on BA's site. Thank you.

[REDACTED]

Attachment 9

Firefox

British Airways - On Business - Reward fl...

www.britishairways.com/travel/on-business-reward-table/public/en_us

Google

Register now | Forgotten PIN/Password? | Remember me

Login ID PIN/Password Login

Flights and holidays

Manage My Booking

Information

Executive Club

USA - English

Reward flight points

To help you calculate the points you will need to redeem for reward flights¹, take a look at the table and example below.

On Business Points **cannot be redeemed** on American Airlines, bmi, Iberia or Qantas operated flights.

On Business company travel

On Business company travel

How it works

For flyers

Ways to book

Offers

News

How we support you

Join On Business

Manage my account

Contact On Business

My Booking

Manage My Booking

Check in online

Booking reference

Last name

Go

On Business Login

On Business members log in here to view your account.

Log in

Page feedback

Did you find the information you were looking for on this page?

Yes

Partially

No

Submit

Here's an example to help you calculate the points you need to redeem for a reward flight:

If you want to redeem for a **round-trip** Club World reward flight from New York to India, via London, you would need 44,310 Points (18,900 + 25,410 = 44,310).

Eligible cabins	First	Club World/ Club Europe	World Traveller Plus	World Traveller/ Euro Traveller
Routes between London and:				
UK Domestic² Intra UK & Ireland routes excluding Jersey	n/a	n/a	n/a	1,560
Europe A All European countries including Jersey, excluding Cyprus, Greece, Russia, Turkey and Ukraine	n/a	6,240	n/a	3,120
Europe B & North Africa Algeria, Cyprus, Greece, Libya, Morocco, Russia (excluding Moscow), Tunisia, Turkey and Ukraine, excluding Egypt	n/a	9,360	n/a	4,680
Israel & Russia Tel Aviv and Moscow	17,820	13,860	9,360	4,680
Middle East Includes Egypt	23,760	18,480	12,480	6,240
North America East & Caribbean All North American routes excluding those listed under North America West	24,300	18,900	13,200	6,600
North America West Dallas, Denver, Houston, Las Vegas, Los Angeles, Phoenix, San Diego, San Francisco, Seattle and Vancouver	29,160	22,680	15,840	7,920
Africa & South Asia³ All African countries including domestic connections with Comair but excluding Algeria, Egypt, Libya, Morocco and Tunisia. Includes India and Maldives	32,670	25,410	17,160	8,580
Central & South America & Far East Argentina, Brazil and Mexico; China, Hong Kong, Japan, Singapore and Thailand	35,640	27,720	18,720	9,360
Australia Sydney	47,520	36,960	24,960	12,480
Routes within:				
Caribbean Intra Caribbean routes	5,940	4,620	3,120	1,560
Middle East Abu Dhabi to/from Muscat, Bahrain to/from Doha	5,940	4,620	3,120	1,560
South America Sao Paulo to/from Buenos Aires	17,820	13,860	9,360	4,680
Routes operated by Comair:				
African Domestic (excluding Mauritius)	n/a	5,200	n/a	2,600
South Africa to Mauritius	n/a	9,360	n/a	4,680
Routes operated by OpenSkies:				
Eligible cabins	First	Biz Bed	Prem Plus	Eco⁴
Paris (Orly) to New York (Newark)	n/a	25,140	16,320	9,270
Notes:				
¹ Points listed are for round-trip flights. Taxes, fees, charges and security surcharges remain payable on reward flights and reward flight upgrades.				
² Routes operated by franchise partner Sun-Air of Scandinavia A/S will redeem at the same points levels as UK Domestic.				
³ Direct services between Australia to/from Singapore will redeem at the same points levels as Africa & South Asia.				
⁴ Eco cabin on OpenSkies routes is available from 19 June 2012 onwards.				

[Back to top](#)

Attachment 10

The screenshot displays the oneworld planner interface in a Firefox browser window. The main area features a world map with a flight path highlighted in red, connecting various cities across the globe. A pop-up dialog box titled "Accurate price for all travellers" is centered on the screen, displaying the following information:

Accurate price for all travellers	
Fare Component:	3,744.00 USD
Taxes:	1,191.24 USD
Service Charge:	0.00 USD
Total:	4,935.24 USD

Below the table, a message states: "Please ensure your credit card issuer will authorize a charge for the above amount." The dialog includes "Cancel" and "Proceed" buttons.

On the right side of the interface, the "My Itinerary" section lists the following cities and dates:

- 1. New York (13 Mar 13)
- 2. Dubai (16 Mar 13)
- 3. Stockholm (18 Mar 13)
- 4. Hong Kong (21 Mar 13)
- 5. Singapore (23 Mar 13)
- 6. Tokyo (26 Mar 13)
- 7. Vancouver

At the bottom of the page, a legend indicates the status of the flight path: "No flight chosen" (blue line), "Flight chosen" (red line), and "Surface sector" (yellow line). A progress bar shows "12/16 allowances used".

Attachment 11

Firefox | oneworld - review | wftc2.e-travel.com/plnext/oneworldRTW/Override.action?_utma=118457175.019414579.1354464708.1358644374.1358740341.5&_uttr= | Google

steps: search flights review travellers purchase reservation

Step 3 - Review your flight details

New York, NY to Dubai

Wednesday, March 13, 2013
 Departure: 09:30 New York, NY, USA - John F Kennedy
 Arrival: 20:15 London, United Kingdom - Heathrow
 Airline: British Airways BA178 Boeing 747-400
 Cabin Class: Economy Restricted

Change of plane required. Time between flights : 1:25.

Wednesday, March 13, 2013
 Departure: 21:40 London, United Kingdom - Heathrow
 Arrival: 08:35 +1 day(s) Dubai, United Arab Emirates - Dubai Intl
 Airline: British Airways BA109 Boeing 777-200/300
 Cabin Class: Economy Restricted

Dubai to Stockholm

Saturday, March 16, 2013
 Departure: 10:05 Dubai, United Arab Emirates - Dubai Intl
 Arrival: 14:00 London, United Kingdom - Heathrow
 Airline: British Airways BA108 Boeing 777-200/300
 Cabin Class: Economy Restricted

Change of plane required. Time between flights : 4:15.

Saturday, March 16, 2013
 Departure: 18:15 London, United Kingdom - Heathrow
 Arrival: 21:45 Stockholm, Sweden - Arlanda
 Airline: British Airways BA784 Airbus Industrie A319
 Cabin Class: Economy Restricted

Stockholm to Hong Kong

Monday, March 18, 2013
 Departure: 18:50 Stockholm, Sweden - Arlanda
 Arrival: 20:25 London, United Kingdom - Heathrow
 Airline: British Airways BA781 Boeing 767
 Cabin Class: Economy Restricted

Change of plane required. Time between flights : 1:40.

Monday, March 18, 2013
 Departure: 22:05 London, United Kingdom - Heathrow
 Arrival: 17:45 +1 day(s) Hong Kong, Hong Kong (SAR of China) - Hong Kong International
 Airline: Cathay Pacific CX254 Boeing 777-300ER
 Cabin Class: Economy Restricted

Hong Kong to Singapore

Thursday, March 21, 2013
 Departure: 14:25 Hong Kong, Hong Kong (SAR of China) - Hong Kong International
 Arrival: 18:10 Singapore, Singapore - Changi
 Airline: Cathay Pacific CX735 Boeing 777-300
 Cabin Class: Economy Restricted

Singapore to Tokyo

Saturday, March 23, 2013
 Departure: 20:15 Singapore, Singapore - Changi
 Arrival: 00:05 +1 day(s) Hong Kong, Hong Kong (SAR of China) - Hong Kong International
 Airline: Cathay Pacific CX636 Airbus Industrie A330-300
 Cabin Class: Economy Restricted

Change of plane required. Time between flights : 1:00.

Sunday, March 24, 2013
 Departure: 01:05 Hong Kong, Hong Kong (SAR of China) - Hong Kong International
 Arrival: 06:15 Tokyo, Japan - Narita International
 Airline: Cathay Pacific CX524 Airbus Industrie A330-300
 Cabin Class: Economy Restricted

Tokyo to Vancouver

Tuesday, March 26, 2013
 Departure: 10:45 Tokyo, Japan - Tokyo Intl (Haneda)
 Arrival: 15:05 Hong Kong, Hong Kong (SAR of China) - Hong Kong International
 Airline: Cathay Pacific CX543 Boeing 747-400
 Cabin Class: Economy Restricted

Change of plane required. Time between flights : 1:20.

Tuesday, March 26, 2013
 Departure: 16:25 Hong Kong, Hong Kong (SAR of China) - Hong Kong International
 Arrival: 12:45 Vancouver, Canada - Vancouver International
 Airline: Cathay Pacific CX838 Boeing 777-300ER
 Cabin Class: Economy Restricted

Dubai to Stockholm

Saturday, March 16, 2013
Departure: 10:05 Dubai, United Arab Emirates - Dubai Intl
Arrival: 14:00 London, United Kingdom - Heathrow

Airline: British Airways BA108 Boeing 777-300ER
Cabin Class: Economy Restricted

→ Change of plane required. Time between flights : 4:15.

Saturday, March 16, 2013
Departure: 18:15 London, United Kingdom - Heathrow
Arrival: 21:45 Stockholm, Sweden - Arlanda

Airline: British Airways BA784 Airbus Industrie A319
Cabin Class: Economy Restricted

Stockholm to Hong Kong

Monday, March 18, 2013
Departure: 18:50 Stockholm, Sweden - Arlanda
Arrival: 20:25 London, United Kingdom - Heathrow

Airline: British Airways BA781 Boeing 767
Cabin Class: Economy Restricted

→ Change of plane required. Time between flights : 1:40.

Monday, March 18, 2013
Departure: 22:05 London, United Kingdom - Heathrow
Arrival: 17:45 +1 day(s) Hong Kong, Hong Kong (SAR of China) - Hong Kong International

Airline: Cathay Pacific CX254 Boeing 777-300ER
Cabin Class: Economy Restricted

Hong Kong to Singapore

Thursday, March 21, 2013
Departure: 14:25 Hong Kong, Hong Kong (SAR of China) - Hong Kong International
Arrival: 18:10 Singapore, Singapore - Changi

Airline: Cathay Pacific CX735 Boeing 777-300
Cabin Class: Economy Restricted

Singapore to Tokyo

Saturday, March 23, 2013
Departure: 20:15 Singapore, Singapore - Changi
Arrival: 00:05 +1 day(s) Hong Kong, Hong Kong (SAR of China) - Hong Kong International

Airline: Cathay Pacific CX836 Airbus Industrie A330-300
Cabin Class: Economy Restricted

→ Change of plane required. Time between flights : 1:00.

Sunday, March 24, 2013
Departure: 01:05 Hong Kong, Hong Kong (SAR of China) - Hong Kong International
Arrival: 06:15 Tokyo, Japan - Narita International

Airline: Cathay Pacific CX524 Airbus Industrie A330-300
Cabin Class: Economy Restricted

Tokyo to Vancouver

Tuesday, March 26, 2013
Departure: 10:45 Tokyo, Japan - Tokyo Intl (Haneda)
Arrival: 15:05 Hong Kong, Hong Kong (SAR of China) - Hong Kong International

Airline: Cathay Pacific CX543 Boeing 747-400
Cabin Class: Economy Restricted

→ Change of plane required. Time between flights : 1:20.

Tuesday, March 26, 2013
Departure: 16:25 Hong Kong, Hong Kong (SAR of China) - Hong Kong International
Arrival: 12:45 Vancouver, Canada - Vancouver International

Airline: Cathay Pacific CX838 Boeing 777-300ER
Cabin Class: Economy Restricted

Legend: = e-ticket option, USD = U.S. Dollar

Price

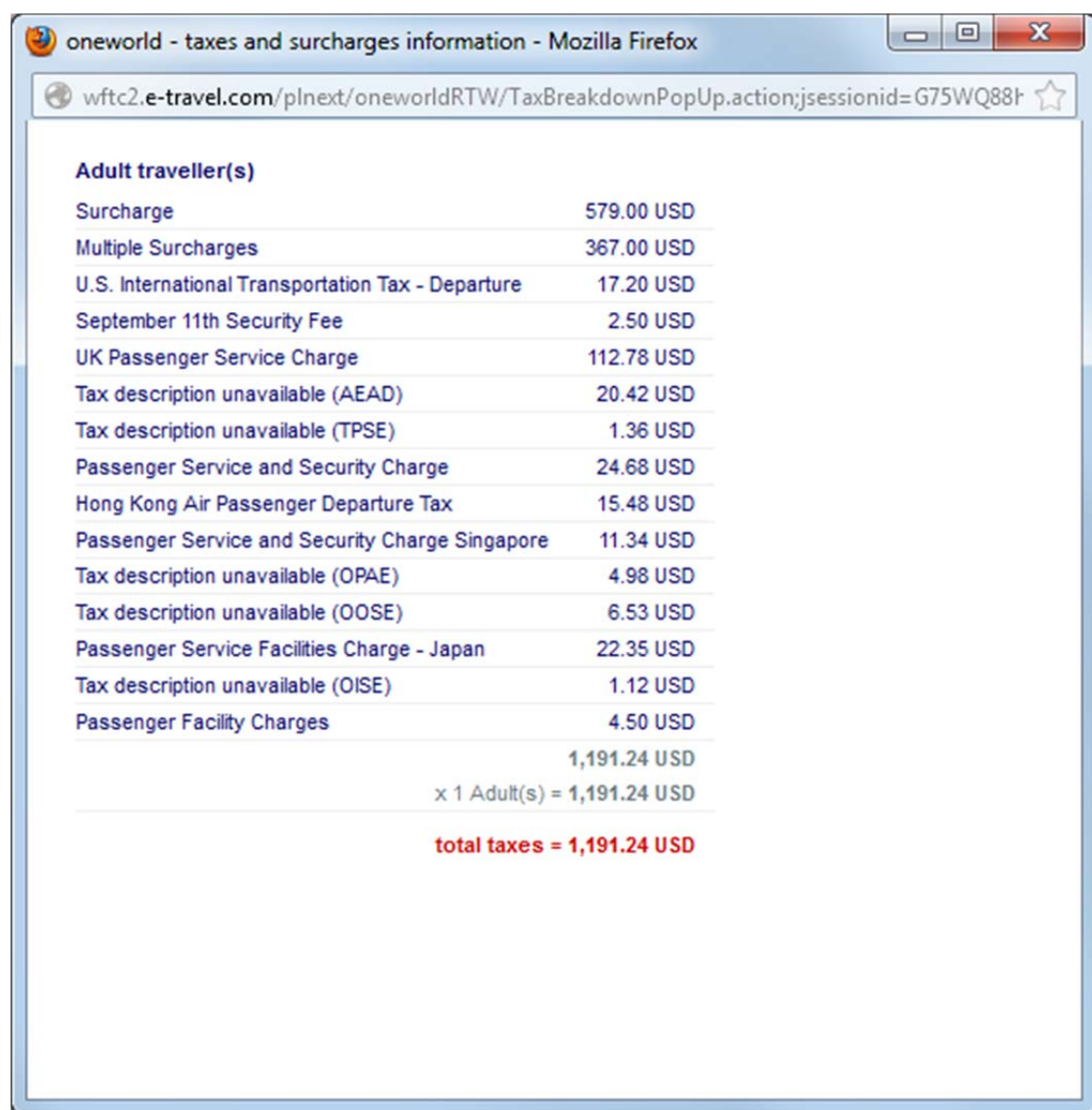
Travellers	Fare	Taxes
1 Adult(s)	x (3,744.00 + 1,191.24)	= 4,935.24 USD
Total price for all travellers		4,935.24 USD

[oneworld Explorer Product Information](#)

Important notes

Taxes are included except where local airport taxes are collected at check-in time.
For additional baggage allowance and disclosure information: <http://ba.airesearch.com/>
If your Credit Card issuer charges a different currency than the one quoted above, exchange rates or commissions from your Credit Card Issuer may apply.

[Back](#) [Traveller Details >](#)



Adult traveller(s)	
Surcharge	579.00 USD
Multiple Surcharges	367.00 USD
U.S. International Transportation Tax - Departure	17.20 USD
September 11th Security Fee	2.50 USD
UK Passenger Service Charge	112.78 USD
Tax description unavailable (AEAD)	20.42 USD
Tax description unavailable (TPSE)	1.36 USD
Passenger Service and Security Charge	24.68 USD
Hong Kong Air Passenger Departure Tax	15.48 USD
Passenger Service and Security Charge Singapore	11.34 USD
Tax description unavailable (OPAE)	4.98 USD
Tax description unavailable (OOSE)	6.53 USD
Passenger Service Facilities Charge - Japan	22.35 USD
Tax description unavailable (OISE)	1.12 USD
Passenger Facility Charges	4.50 USD
	1,191.24 USD
x 1 Adult(s) =	1,191.24 USD
total taxes = 1,191.24 USD	