



National Air Carrier Association

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May 26, 2015

Honorable John Forbes Kerry
Secretary
United States Department of State
2201 C Street, NW
Washington, DC 20520

Re; Open Skies Agreements / DOS-2015-0016

Dear Secretary Kerry:

National Air Carrier Association submits these comments on behalf of its fifteen member airlines, all certified under United States Code of Federal Regulations Title 14, part 121. These airlines provide scheduled and non-scheduled passenger and cargo services to points within the United States and around the world.

NACA's position may be summarized as follows:

1. NACA agrees with the notion that claims set out in the publically available report prepared by American Airlines, Delta Air Lines, and United Airlines should be investigated in detail.
2. Any such analysis should be thorough and comprehensive, also including a study of subsidies received by U.S. and other foreign airlines from both central (federal) and local (states) government agencies – during both formative years for the respective airlines and recent periods.
3. If, after completing the analysis, Department of State concludes foreign government subsidization is denying U.S. passenger carriers a fair opportunity to compete, it should initiate consultations with governments of the United Arab Emirates and Qatar, as provided in applicable air service agreements.
4. Gulf carriers should not be prevented from initiating new services to the U.S. while this matter is being investigated, or, thereafter, while consultations are in progress.
5. Principles included in applicable open skies agreements should be strictly respected, and U.S. government should continue to vigorously seek new open skies agreements.

We appreciate the opportunity to submit these comments.

Yours truly,

A. Oakley Brooks
President