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**VERENIGING VAN
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ZAKENREISBUREAUS**

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U.S. Department of Transportation
PL-401
400 7th Street, SW
Washington, DC 20590
U.S.A.

OST-99-6694-33
DIRECTOR OFFICE
DECEMBER 19 2000

Subject :IATA Corporate Identification Number
Re :VLZ/4.5/WS/00122

De Meern, 19 december 2000

Dear Sir/Madam,

The Netherlands Association of ANVR Business Travel Agents, representing over 100 business travel agencies in The Netherlands, would like to express its opposition to the IATA proposal to create a Corporate Identification Number.

In our opinion the Corporate Identification Number will make company data from our member's clients available to all airlines and any GDS business partner which acquires data from any one of the Global Distribution Systems. We have the following objections:

First, the Corporate Identification Number violates the privacy of our member's clients. In giving data to one airline, corporate clients are forced to give data to any airline that buys these data, including airlines they have no contract with.

Second, corporate clients have no control of how airlines use these data. Airlines commonly combine data from one system to data in another system. Besides, the data is flawed and does not include refunds and exchanges. While IATA claims that the data may be used only for appropriate purposes, corporations and travel agents cannot police how these data are used.

Third, IATA's proposal would eliminate the bargaining tool that corporations have and that is it's travel patterns, including destinations, flight numbers, airline flown and class of service. Taking into consideration that under the current aviation environment corporations are dealt with overpriced airfares and single airline dominated markets, corporations losing their bargaining tool may become a serious risk.

Although travel agents themselves are not a party to the contract that IATA and corporations may conclude, travel agents are forced to participate in the proposed IATA programme, because they have to make reservations for their clients in a CRS, while travel agents have no method to prevent that the CRS's pass these data on to airlines.



In view of the above mentioned objections, the members of The Netherlands Association of ANVR Business Travel Agencies prefer not to participate in any way in the proposed IATA programme.

In behalf of our members' clients, we require confidentiality and restricted and proper use of the data of clients. Therefore we urge the Department of Transport to deny the proposed Corporate Number.

Yours sincerely,

THE NETHERLANDS ASSOCIATION OF ANVR
BUSINESS TRAVEL AGENCIES

Drs. W.W. Schut
Secretary Retail

Cc : ECTAA (Group of National Travel Agents' and Tour Operators' Associations within the EU)