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OST-97-2881-346

March 13, 2003

Docket Management Facility  
 U. S. Department of Transportation  
 400 Seventh Street SW  
 Nassif Building, Room PL-401  
 Washington, D.C. 20590-0001

U.S. DEPARTMENT OF TRANSPORTATION  
 03 MAR 13 PM 2:00



Re: Docket OST-1997-2881, U.S. DOT/OST Advance Notice of Proposed Rulemaking, Computer Reservation System (CRS) Regulations (Part 255)

To whom it may concern:

My name is Patricia Humburger, and I work for Sand Canyon Travel, Inc., in Santa Clarita, California. We employ 13 people and typically serve 2500 customers annually.

With respect to proposed CRS rules (referenced above), these regulations, if finalized as written, will harm competition in general, and consumers in particular. In addition, they will likely harm my business directly, since these misguided rules will let airlines control all public access to airfares, eliminating my ability to give my customers access to the best airfares and services. The rules also prevent CRSs from providing me with financial incentives – the federal government should not interfere with my right to negotiate such assistance.

The bottom line is that, so long as airlines own or maintain control over ticket distributors like Amadeus, Worldspan and Orbitz, federal oversight is vital to preserving fair competition. With this in mind, I strongly urge the U.S. Department of Transportation to ensure that any new CRS rules adopted include the following provisions:

- Retain flexibility in CRS commercial agreements with travel agencies
- Continue “Mandatory Participation” and extend to cover airlines maintaining marketing agreements with CRSs to ensure consumer safeguards equally apply to all airline-controlled distributors, including Orbitz; and,
- Apply existing and proposed CRS rules to Orbitz, which operates as a CRS today.

In addition, I strongly support the U.S. DOT’s recent proposal to extend the current CRS rules through January 2004, to allow thorough review and enable new industry programs to succeed in the marketplace.

Thank you for this opportunity to share my comments.

Sincerely,

A handwritten signature in cursive script that reads "Patricia Humburger".

Patricia Humburger  
 Manager  
 Sand Canyon Travel, Inc.  
 25844 N. McBean Parkway  
 Santa Clarita, Calif 91355  
 661-254-7278

25844 McBean Parkway • Valencia, California 91355  
 (661) 254-7278 • (661) 252-0710 • Fax (661) 254 7135 • E Mail: travelvalencia@carlsontravel.com  
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