

In full support of the comments and proposed resolutions submitted by IATA on the 30th of March 2008 to the U.S. Department of Transportation, Japan Airlines humbly adjoins the following comments for the board's consideration.

- Foreign carriers are not the root of congestion during the peak hours when the carrier operates only one or two flights on a daily basis to a given airport.
- Foreign carriers have a great disadvantage in avoiding “congested hours” in the U.S., as the arrival and departure time “SLOT ALLOCATION” of their own respective countries must be considered along with providing a convenient schedule for the traveling public.
- Increasing rates for carriers operating within the “congested hours” should be assessed to the carriers with the heaviest traffic during the designated hours.
- The pre-collection of fees appropriated for airport development of future plan as a facility fee is unacceptable and an unfair practice as mentioned by IATA. As there are no guarantees that all the carriers operating would benefit from the pre-collection and may create an environment where carriers ceases operation into the facility.
- The practice of collecting additional fees to support “Secondary” airports from the “Primary” airports is unacceptable as its future affects has not been clearly defined.

Japan Airlines International Co. Ltd
Airport Flight Operations Division
300 Continental Blvd – Suite 620
El Segundo, CA 90245