

February 13, 2003

Mr. John Kiser
U.S. Department of Transportation
400 Seventh St., S.W.
Washington, D.C. 20590

Dear Mr. Kiser:

The undersigned trade associations and companies comprise the High Tech Airfreight Shippers Coalition (the Coalition). On Friday, February 7, 2003, the International Air Transport Association (IATA) filed with your agency a request for antitrust exemption for a cooperative agreement by IATA's Cargo Tariff Coordinating Conference to raise air freight shipping rates on lower density cargo (Docket number OST-2003-14480-1). This proposal to modify IATA's Resolution 502 cannot take effect without DOT granting this waiver. We understand that the standard comment period DOT provides for such requests is 21 days. The Coalition intends to file comments which will show that this agreement, if approved, will be anti-competitive, impose a significant burden on the U.S. economy, and is not in the public interest.

IATA's proposal would directly affect the pricing of airfreight by establishing a new methodology by which low-density freight is assigned an imputed weight. The proposal would impose a serious economic burden on high tech and many other sectors of the US economy that are dependent on airfreight services. Recognizing this burden, and the overall impact this proposal will have on a struggling US economy, we believe it is important that DOT's consideration of this matter be deliberate and comprehensive.

Toward this end, we hereby request that DOT extend the comment period for a minimum of 90 additional days. This extension is necessary for our Coalition to have adequate time to thoroughly address the many complex issues and assertions raised in IATA's filing.

We appreciate in advance your consideration of this request.

Sincerely,

Stephen F. Harper
Intel Corporation

Leslee Coleman
Solectron

On behalf of Coalition members:

AeA (formerly the American Electronics Association)
Consumer Electronics Association
Electronics Industries Alliance
Information Technology Industry Council
National Electrical Manufacturers Association
Semiconductor Industry Association
Semiconductor Logistics Forum

Acer America
Agere Systems
Agilent Technologies
Altera
Amazon.com
AMD
Applied Materials
Celestica
Cypress Semiconductor
Flextronics
Hewlett Packard
Infineon
Intel Corporation
Jabil
Motorola, Inc.
National Semiconductor
Nokia
ON Semiconductor
Panasonic
Philips Electronics North America
Rockwell Automation
Sanmina-SCI
Solectron
Sun Microsystems
Texas Instruments

cc: The Honorable Norman Mineta
Assistant Secretary Read Van de Water
John Flaherty, Chief of Staff