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February 24, 2003

Re: Agreements Adopted by the Traffic
Conferences of the International
Air Transport Association
Docket OST-2003-14480

Paul Gretch
Director, Office of International Aviation
U.S. Department of Transportation
400 Seventh Street, S.W.
Washington, DC 20590

Dear Mr. Gretch:

Pursuant to your notice posted February 21, 2003, please find attached a request supporting a 90-day extension of the deadline for comments on the Application for Approval of Agreements filed January 7, 2003 in the above referenced docket by the International Air Transport Association. We submit this request on behalf of the High-Tech Air Freight Shippers' Coalition, whose membership list is also attached.

Respectfully submitted,

W. Clark McFadden II
James M. Wickett

Attachment

cc: David M. O'Connor, IATA

**BEFORE THE
DEPARTMENT OF TRANSPORTATION
WASHINGTON, DC**

Agreements Adopted by the Traffic
Conferences of the International
Air Transport Association

Docket OST-2003-14480

Re: Request for Extension of Time in Which To File a Document

I. Interested Person Filing This Response

The High-Tech Air Freight Shippers' Coalition (the Coalition) (membership list attached at appendix) is the interested person filing this response.

II. Counsel for the Interested Person

W. Clark McFadden II
James M. Wickett

III. Service Address

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IV. Request For Comment Period Extension

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). 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 U.S. economy that are dependent on airfreight services. Recognizing this burden, and the overall impact this proposal will have on a struggling U.S. economy, we believe it is important, in keeping with DOT's responsibility to deny antitrust immunity for anti-competitive agreements that do not satisfy the public interest requirement, that DOT consider this matter with the benefit of broad public participation.

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 raised in IATA's filing. In this period, we intend to conduct an economic and legal analysis of the impact of the IATA filing.

Finally, we believe that there are many other industries that would be impacted by this proposal that would like the opportunity to comment, but would not have this opportunity without an extension of the comment period.

Respectfully submitted,

W. Clark McFadden II
James M. Wickett

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*Counsel to the High-Tech Air Freight
Shippers' Coalition*

Dated: February 21, 2003

High-Tech Air Freight Shippers' Coalition

Membership List

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
Motorola, Inc.
National Semiconductor
Nokia
ON Semiconductor
Panasonic
Philips Electronics North America
Rockwell Automation
Sanmina-SCI
Solectron
Sun Microsystems
Texas Instruments