

Regarding the April 25, Subcommittee on Aviation, Hearing on FAA's Capacity Benchmarks
2:00 p.m., 2167 Rayburn House Office Building
Contact: 847-506-0670

US-CAWA statement on Peak-time market based incentives to reduce flight delays:

Clearing the Runway

US-CITIZENS AVIATION WATCH ASSOCIATION (US-CAWA) is concerned about the implementation of peak-time market based incentives as the only tool to control airport congestion.

Peak-time market-based incentives will likely cause other problems, and not lead to reducing congestion during High Density Rule hours, but will most probably lead to an overall increase in the number of flights operated.

Over the next few years, the number of flights will increase dramatically with the extraordinary doubling by the year 2010, as predicted to occur by the Federal Aviation Agency (FAA) and the National Aeronautics and Space Agency (NASA) in a recent, internal document.

Some of the problems with the peak-time market scheme are:

- The slots are so valuable that if not immediately filled, eventually and certainly they will be.
- Aircraft during peak hours will probably have reduced load factors because of higher priced tickets thereby increasing the number of flights needed to handle large numbers of price-displaced travelers during non-peak hours.
- A shift of flights to non-peak hours would thus merely shift them to late evening and night hours and would increase total noise levels during "quiet" or "curfew" hours. These additional noise increases will be exacerbated by the ripple effect from airports elsewhere from which planes will also be flying later at night and earlier morning.
- The peak-time pricing scheme would have anti-democratic consequences to those persons without the affluent means to travel during peak daytime hours. This would further add to the gulf between the haves and the have-nots by forcing poorer people to travel late at night and on the red-eye specials. Additionally, many persons might have to either wait many hours at an intermediate airport or stay in a hotel before taking connecting flights to their destination airports.

- There would be an adverse impact of higher fares on tour operators' packages, for most tour groups must travel during daylight time, usually leaving early in order to get travelers to their cruise ships or whatever. In addition, higher fares could, conceivably, have a negative effect upon tour sales by blocking access to them by the less affluent.

Thus, it is most apparent that other options such as flight caps and lotteries are a better answer to short-term congestion problems. Additionally, any slot allocation, particularly at airports located in the vicinity of major residential areas, should give preference to aircraft that have noise and gaseous emissions that are above the statutory minimum. Preferential allocation on the basis of an aircraft's environmental performance would provide a constant incentive to develop reduced noise and gaseous emissions as a factor of competition.

It is to be noted, with much interest, that many of the massive and unparalleled delay problems the flying public has been experiencing were predicted, if Congress were to remove flight caps at slot controlled airports, by a 1995 Department of Transportation (DOT) Report to Congress.

The recently passed, controversial AIR-21 aviation bill and other exceptions to the slot rule added more flights into slot controlled airports and thus causing consequent massive delays system wide. In effect, many are to blame for the delays for not heeding the DOT warning of 1995.

NASA and the FAA also lately predict that there is no foreseeable fix capable of alleviating the unacceptable delay problems any time before the year 2015, if then.

We of US-CAWA believe that several previous Congress and Administrations' have wasted *billions* of dollars on an inefficient and the least sustainable form of transportation for which correctives to its problems are simply unattainable. We also believe that we need to be developing other modes of mass transit for long-term relief and competition.

US-Citizens Aviation Watch Association / www.us-caw.org

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US-CAWA is a national organization representing approximately 1.5 million members in the United States. As a nongovernmental organization, it also has members and affiliate organizations in at least twenty-seven other countries.

A full text version on Peak-time pricing will be submitted when the call for comments is addressed in the Federal Register at a later date.

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