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BEFORE THE
DEPARTMENT OF TRANSPORTATION
WASHINGTON, D.C.

DEPT. OF TRANSPORTATION
DOCKETS
MAY 25 PM 2:50

In the matter of final rules concerning

DISCLOSURE OF CODE-SHARING
ARRANGEMENTS AND LONG-TERM
WET LEASES (14 CFR Part 257)

and

DISCLOSURE OF CHANGE OF GAUGE
SERVICES (14 CFR Part 258)

Dockets OST 95-179 and
OST 95-623

Dockets OST-95-177, 47546,
45911, 45912, and
45913

ANSWER OF
OAG WORLDWIDE

Communications with respect to this document should be sent to:

Richard J. Fahy, Jr.
1800 Diagonal Road
Suite 600
Alexandria, VA 22314
(703) 684-4422
Email: rfahy@ibm.net

Richard Nelson
Publisher
OAG
2000 Clearwater Drive
Oak Brook, IL 60523

May 25, 1999

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**ANSWER OF
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By a Petition, dated May 24, 1999, the Air Transport Association (ATA) has requested an extension of the effective date of the code share and change of gauge disclosure rules that are scheduled to become effective July 13, 1999¹. OAG Worldwide (OAG), a division of Reed Elsevier Inc., hereby answers in support of ATA's Petition. Based on its discussions with the carriers, OAG believes that an extension of time is

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By a letter, dated May 4, 1999, Midwest Express Airlines has also requested an extension of time because its CRS has notified it that it will not meet the July 13 deadline.

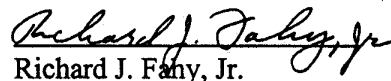
necessary to enable the industry to comply with the Department's requirements. While an extension to January 1, 2000 would normally be adequate, OAG agrees with ATA that the Y2K problem, which would coincide with that date, makes an extension to February 15, 2000 appropriate.

Since ATA has fully set forth the practical problems faced by the industry in complying with the regulation, OAG will not restate those concerns. OAG has been working with the industry, and believes that many carriers and CRSs will have difficulty complying with the July 13 date. Moreover, carriers worldwide must make the appropriate changes in order to submit their schedule information to the OAG in formats required to meet the new regulation.

The industry organization that coordinates schedule information exchange formats, the IATA Schedule Information Standards Committee, will meet in Miami on June 7-8, 1999 to consider changes to the SSIM formats used by airlines to submit schedules to the OAG and other publishing companies. While proposed changes have been submitted by that Committee to its members, they will not be acted upon until the meeting, and many carriers will not make the changes until after there is an agreed format. It would be helpful to the industry if the Department could notify the industry of its decision on an extension of the effective date of the rules prior to the meeting.

While the industry would normally be able to accomplish the necessary programming changes with a few months delay of the rules, it is facing a unique situation this year in the form of the Y2K problem. Because of the widespread concern about computer operations on January 1, 2000, corporations are devoting extensive programming efforts to insuring that computers do not crash with the new century. As a result, many companies are imposing "change freezes", under which they will not allow any software changes to their computers for some months prior to January 1. This will make it impossible for them to test the necessary programming changes required to comply with the Department's rules. OAG, therefore, supports ATA's proposal that the effective date of the rules be extended to February 15, 2000.

Respectfully submitted,


Richard J. Fahy, Jr.
Attorney for the
OAG Worldwide