

Hello.

I would like to make two brief comments on the government's consultation on Australia's aviation system.

The first is that I believe there should be a robust passenger bill of rights, akin to that offered to passengers in the European Union. This should apply to any airline operating aircraft above a certain capacity threshold, in recognition of the marginal economics of regional airlines operating smaller aircraft to connect regional communities. However, this can create conflicting incentives and barriers, depending on whether it applies only to passenger flights above a certain capacity, or to any airlines that include higher capacity aircraft in their fleets.

Any passenger rights/compensation scheme should be administered by a centralised government authority and not by the airlines themselves.

Secondly, I believe the Government/ACCC should be given the authority to break up airlines once they pass a certain marketshare threshold that creates excessively dominant carriers. These powers should enable forced divestiture of assets including terminal and gate space, as well as whole divisions. For example, Jetstar is wholly owned by Qantas Group. Together, these two carriers control 60-65% of the domestic market at any one time, which provides excessive market influence to Qantas Group on domestic services.

Qantas should be forced to divest Jetstar, thereby creating Australia's long sought after, stable third major airline. Qantas claims there is no cross subsidy between the airlines so Jetstar should be able to survive and prosper.

Finally, all airline gifts to elected officials and top civil servants, including lounge memberships, frequent flyer status and flights and other travel perks, should be deemed illegal, in recognition of their corrupting influence, whether actual or perceived.

Thank you and regards,  
Christopher Lane