The Travel Technology Association member companies are best positioned to determine how ancillary fee information should be presented to consumers within the U.S. Department of Transportation Notice of Proposed Rulemaking DOT-OST-2022-0109

The Travel Technology Association ("Travel Tech") applauds the Office of Information & Regulatory Affairs and the U.S. Department of Transportation's (DOT) continuing work and commitment the proposed rule - **Enhancing Transparency of Airline Ancillary Service Fees DOT-OST-2022-0109** – which is vital to consumer protection when booking airfare. Travel Tech has long advocated for ancillary fee transparency for airlines. In 2014 and 2017, we supported DOT's proposals to require airlines to share their ancillary fee information with ticket agents so that consumers could have complete visibility into the cost of their flight options, regardless of whether they use a direct or indirect channel to book their air travel.

One of the core provisions of the proposed ancillary fee rule would require the first-page display of the fees for a first checked bag, a second checked bag, and a carry-on bag, adjusted based on passenger-specific information along with the sought-after fare and schedule information – with no links, roll-overs or other forms of flexible display allowed. The proposed rule would also require a first-page display of the change and cancellation fees, and family-travel seat fees, again with no links and roll-overs or other forms of flexible display allowed. Taken together, these provisions are problematic for consumers and Travel Tech members alike.

Consumers greatly value online travel agents for their role in facilitating easy comparison and booking of multiple multi-brand options in one place. By design, our members' sites provide consumers with a wide range of flight options and information. To manage the overwhelming amount of information, online travel agents regularly invest in user interface design upgrades and usability testing to enhance customer satisfaction and streamline the buying process. Consequently, travel Tech members are deeply concerned by DOT's rigid requirements to display ancillary fee information on the first page of search results and not on subsequent pages that customers typically navigate once they have selected a specific flight option.

A first search page display requirement for all critical ancillary fees will result in unacceptable screen clutter that will make locating flight options and information more, not less, of a challenge for consumers. Such information overload would diminish the value our Travel Tech members offer consumers in the first place. An overwhelming search experience could provide a real impetus for consumers to forgo comparison shopping altogether. Instead, they would potentially seek out airlines' far more streamlined and to-the-point web pages since airlines only need to display their ancillary fee information alongside their flight offerings.

Members of Travel Tech strongly believe that flexibility is essential on when and where ancillary information is displayed in search results – so long as consumers can view this information before purchase. Indeed, the DOT itself states in the proposed rule on Page 63725 — that the goal is "to ensure that fee information about ancillary services that are critical to a consumer's decision-making is disclosed at all points of sale *before* ticket purchase."

Further making a case for flexibility is that the Internet is changing, and how consumers search for flight information will undoubtedly change, too. The internet searches of the future will be far more immersive and embodied, with the results contextualized, even when viewed on a laptop or mobile device. Information will no longer be statically placed on a webpage or traditional seat map. Instead, it could be "seen" online floating over the seat in a "digital twin" replica of the interior of an airplane. Leading consumer brands have already begun to offer products online in this manner as if the internet shopper is viewing them in person; one can imagine how this could apply to many facets of the travel industry. With these proposed website-design regulations, we fear that the DOT has underestimated the impact of these changes on our members, but most of all, the consumers who rely on our members' sites to find competitive airline fares.

Travel Tech believes that our member companies are best positioned to innovate and determine how ancillary fee information should be presented to consumers. There is deep concern about consumer information overload, especially on mobile devices, and creating a disincentive to use price comparison sites to seek competitive airline fares.

To quote one of Travel Tech's founding members – "The pricing permutations of flight schedule, fare type/cabin, and specific seats are huge, and requiring that all options and therefore all combinations are shown at the first page will place a huge computing and communication burden on industry systems, and lead to slower page retrieval times, larger web pages, and materially slower page loading times."

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The Travel Technology Association (Travel Tech) empowers traveler choice by advocating for public policy that promotes marketplace transparency and competition. Travel Tech represents the leading innovators in travel technology, including online travel agencies, metasearch engines, short-term rental platforms, global distribution systems, and travel management companies.

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