THE IMPLICATIONS OF NEUTRALITY RULES:

APPLICATION TO OTHER SECTORS

Airline industry

March 2015

CONTENTS

1. NET NEUTRALITY IN THE AIRLINE INDUSTRY

The commercial aviation sector provides air transport passenger and cargo services. In this paper we will focus on passengers travelling for business or pleasure.

The business model of commercial airlines is based on optimising occupancy levels so as to maximize revenues in order to at least cover the high fixed and semi-fixed operating expenses. Airlines pursue this objective through a variety of commercial activities, evaluation and selection of the routes they operate and the establishment of strategic alliances with other companies (giving them access to customers of other airlines). Market characteristics differ substantially depending on the distribution channel employed allowing for a distinction to be drawn between direct sales and indirect sales through intermediaries.

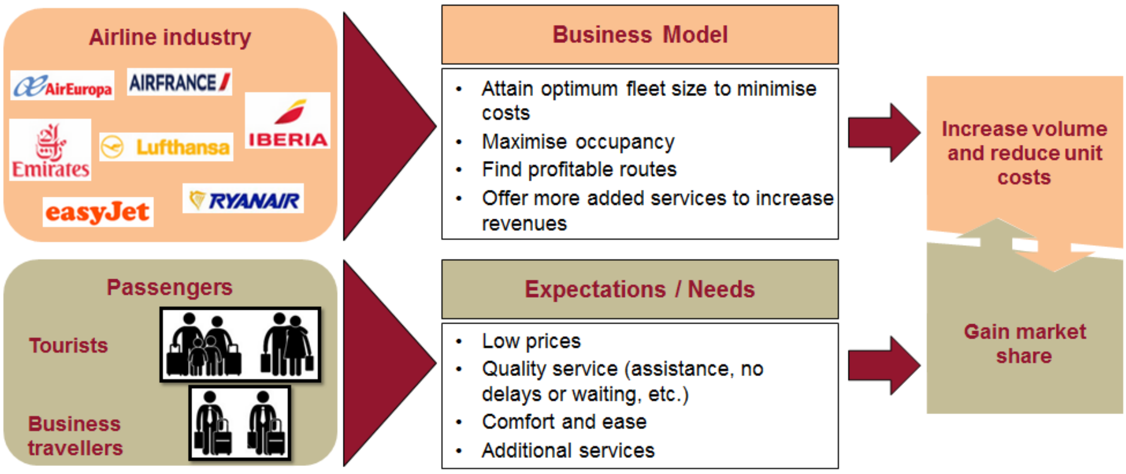
Direct sales may be through three channels, (i) at the airport terminal counter, i.e. walk-in-customers, (ii) through the web page and (iii) on the phone through the company's own call centre. Private customers purchasing tickets pay the publicised price directly (appearing on the web page or offered on the telephone) for each category of seat, trip duration, geographical location and time of year the service is hired.

Indirect sales may be broken down further by type of intermediary: tour operators and Online Travel Agencies (OTAs). Both offer end customers services without exclusivity agreements.

- **Tour** operators. Tour operators and travel agencies purchase seats on flights and then include these in their vacation packages subsequently acquired by end customers. These operators generally establish agreements with airlines to reserve a certain number of seats that they usually get at a discount. Sometimes these operators are vertically integrated in large tourism companies as is the case with TUI AG and in some cases have their own fleet of aircraft.
- **Online flight sale and price comparison portals** or OTAs. These are retailers that sell airline tickets mainly to end customers and charge for their services. Their activity provides market transparency.

In terms of demand, a distinction can be drawn between two types of **airline customers:** holiday and business travellers. Generally speaking, the former pay more attention to ticket price when choosing an airline, although there are other variables that apply to both groups of travellers such as flight frequency, location of the destination airport, additional services and the quality of customer service offered by the airline.

Figure 1: Business model characterising the airline industry



Source: *Created in-house*.

Business strategies employed by airlines

Airlines try to adapt to the preferences and needs of consumers mainly by applying differential pricing practices based on a wide array of criteria. These strategies vary depending on the class of the ticket, the conditions under which the ticket was purchased, the time the ticket was purchased and other aspects. These may also include surcharges and/or discounts for the purchase of additional services or connecting flights, giving rise to strategies that seek to attract consumers based on criteria such as destination, service quality and/or level of priority in treatment. Following are the strategies most commonly used:

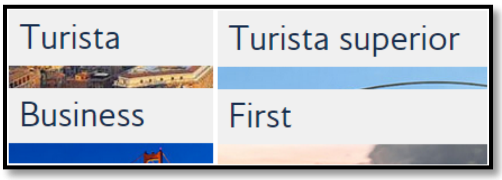
i. **Discounts for early bookings.** The earlier the booking date the lower the price is an axiom typically followed by airlines.

ii. **Discounts on last minute bookings.** Airlines often slash prices on flights where there are a large number of seats still available. The purpose of this strategy is to attract last-minute passengers thus maximising occupancy.

iii. **Discounts based on ticket price.** These promotions are applied on bookings whose value exceeds a certain threshold. For example, direct promotional discounts for bookings whose minimum price is € 600.

iv. **Discounts based on customer profile.** Some groups such as young people or exchange students can benefit from advantages such as flat rates for a certain number of trips, being able to check additional or oversize luggage, change of return date at no cost, and others.

v. **Establishment of travel categories (e.g. economy, business or preferential and first class).** Typically, airlines offer different conditions or additional services to travellers depending on the class they travel in. For example, business class tickets include more comfortable and spacious seats or allow access to VIP lounges at airports. Each class of travel normally has a different price.



vi. **Promotions for groups.** Volume discounts apply when customers purchase a large number of seats at the same time, i.e. better prices and advantageous conditions for groups over 10.

vii. **Loyalty cards.** These are point cards for both individuals and companies and are offered free of charge. Travellers accumulate points with each flight they take which can then be used to get discounts or special conditions such as priority boarding, free baggage check, discounts on accommodation, restaurants, etc. This is a loyalty strategy to attract and keep customers, both individuals and business travellers, who are frequent flyers.

viii. **Credit cards associated with an airline's loyalty programme.** The use of these cards, offered with an annual fee, give holders certain advantages such as discounts on the price of tickets or at petrol stations. An example would be the Iberia Visa card.

Iberia Sendo Clásica	
Obtención de avios	1 Avios cada 5€ con Visa
Cuota anual 1er año	GRATIS
cuota anual a partir del 2º año	45 €
Descuento en gasolineras Repsol	Si
10% de descuento en compras de billetes Iberia	Si

ix. **Prices based on the seasonal flow of travellers and destination.** Airlines charge different prices depending on demand behaviour. For example, they charge lower prices for flights leaving on Tuesdays and Wednesdays at mid-day and very early morning than on other days and time slots. Higher prices likewise apply in "high season" and lower prices in "low season". Lastly, prices tend to vary depending on whether the destination is more tourist or business oriented.

x. **Surcharges depending on payment method.** Airlines may put a surcharge on ticket prices or waive such charges depending on the payment method chosen by the consumer. For example, surcharges are often applied to credit card payments.

xi. **Additional services.** Airlines offer complementary services over and above air transport which they can charge for or offer for free as part of a marketing strategy. Examples include: seat selection, priority boarding, travel insurance, flexibility allowing for change or cancellation of a flight, additional and special baggage (such as sports equipment or musical instruments).

xii. **Discounts and special services for passengers on connecting flights**. Airlines may charge a lower price for a ticket customers may need to arrive at the airport from which their flight leaves. For example, for a flight from Santiago de Compostela to Tokyo with a stopover in Madrid, the fare between Santiago and Madrid is lower than the ticket price would be if that passenger were travelling to Madrid as the final destination. Moreover, airlines offer integrated transport services benefiting customers and do so either directly or by establishing agreements with other companies. For example, airlines take responsibility for the transport of checked luggage from the airport of origin to the final destination and also provide passengers with boarding passes for connecting flights.

xiii. **Different prices depending on the purchase method and place where the** ticket is bought, i.e. airline website or airport ticket office.

xiv. **Marketing of combined air-rail and air-bus** tickets. Intermodal ticket sale is a collaborative strategy to offer clients comprehensive transportation service at a cheaper price than they could get if they bought their tickets separately. This strategy aims at ensuring that other means of transportation —especially high speed— serve to attract passengers to the hub thus increasing the volume of airline passengers.

These are some of the strategies often used by airlines, a sector which is constantly innovating its marketing variables by applying a host of price differentiation strategies. The many options, services, surcharges and promotions is such that it is quite likely for two passengers sitting in the same row on a flight to pay different prices for their tickets. The tariff applied is usually determined in real time by complex revenue management computing, a field in which airlines are experts. This all has the dual objective of optimizing aircraft occupancy while maximising revenue.

Following is an analysis of how the hypothetical imposition of net neutrality would lead to an industry-wide loss of dynamic efficiency.

Application of neutrality rules in airline strategies

The imposition of neutrality criteria would restrict application of most of the commercial strategies used today by airlines insofar as the aim of most such strategies is to segment customers based on their profile, needs, airport of destination, ability to pay and other criteria, which in many cases are not transparent. In our definition of neutrality rules we mentioned that *"when the neutrality rule is applied, all market participants must be treated equally in terms of pricing, preferences, quality, quantity and priority."* **Hence, this rule would mean that airlines would not be authorized to distinguish between different customer profiles within the same class** —economy, business and first class— **and that all seats in the same class would have the same price, optional services and preferential treatment. Neutrality rules would also force airlines to charge the same price per seat and offer the same services, regardless of whether the passenger was taking a direct or connecting flight.**

A stricter interpretation of these rules could result in the setting of a single price regardless of the seat or additional services contracted. This stricter interpretation could also possibly mean that airlines would be prohibited from offering different classes, i.e. economy vs. business, or that they would be forced to apply the same conditions to intermediaries and associated companies*,* irrespective of their sales power, agreements with other companies or their membership in a larger group of transport enterprises**.**

An across-the-board standard price for all seats on the same flight would spell the end of the vast majority of the marketing strategies used by airlines to maximize aircraft occupancy. For example, airlines would not be allowed to charge lower prices to customers who book in advance, frequent business flyers or passengers on transcontinental flights with stopovers. As a result, airlines would no longer be able to cover the risks arising from the varying occupancy flows of their flights meaning that they would require higher profitability to offset these risks. Hence, airlines would be forced to raise ticket prices to cover operating expenses. They would also be forced to eliminate those routes and destinations where occupancy is most affected such as, for instance, overseas flights made prohibitive due to expensive connecting flights. They would likewise be forced to terminate collaboration agreements with other companies and to offer flight and baggage handling services regardless of the route or number of stopovers and this would have an effect on passenger transport and on the economy in general.

The role of intermediaries would also be adversely affected insofar as they would no longer be able to book large numbers of seats in advance at lower prices so as to offer attractive terms to customers.

These rules would also be clearly detrimental to customers: the higher prices that airlines would be forced to charge to cover their risks would mean that fewer customers would be able to afford to fly. Furthermore, the elimination of routes and connecting flights would force travellers to seek alternative means of transport or destinations.

These rules would also eliminate the capacity to adapt to the needs of each customer. For example, all customers would have to pay to check luggage, take out travel insurance and pay direct flight prices (as opposed to connecting flight). Airlines would also be prohibited from monetizing services such as providing customers with digital boarding passes on their mobile phones (instead of paper boarding passes) or by allowing customers to reserve their seat as opposed to those who have no such preference. Certain in-flight services such as catering, boutique or lottery and betting (scratch) would also disappear with the ensuing prejudice to customers wishing to use such services and willing to pay for them. Agreements with hotel chains and car rental companies offering exclusive discounts on accommodation or car hire would also disappear thus increasing the cost, both in terms of time and money, to users when making travel plans.

In short, the imposition of neutrality rules would seriously affect the business model used by airlines, especially the strategies devised to capture and retain customers and to manage the occupancy flows of their fleet of aircraft or the routes they operate. Ultimately, this would lead to higher ticket prices, less investment in aircraft and fewer routes and destinations, all resulting in more limited opportunities for passengers to travel by plane.

While our intention is not to provide an all-inclusive list, mention should be made of the following consequences of neutrality for airlines and customers:

a) **Impact of neutrality rules on** airlines:
   - Fewer tools with which to efficiently manage occupancy due to limitations on marketing strategies promoting occupancy and additional services to attract passengers;
   - Increased operational risks for airlines;
   - Cancellation of less profitable routes;
   - Loss of profitability;
   - Less incentive to invest in the aviation sector (fleet renewal / expansion) or operate in international airports, etc;
   - Less incentive to operate through hubs (which means higher airport charges) and reach agreements with other airlines to cover overseas routes with stopovers;
   - Less incentive to offer long flights or with stopovers;
   - Less incentive to strike agreements with other companies to offer customers transportation and baggage handling together, especially in the case of connecting flights;
   - Less incentive to reach agreements with tour operators to offer services that include accommodation or car rental at destination.

b) **Impact of neutrality rules on intermediaries:**

- Higher prices for tourist packages that include airline tickets;
- Higher prices or loss of operating margin for online portals offering flight ticket comparison and sale;
- Less incentive to provide intermediary services (making it more difficult for users to find what suits their needs).

c) **Impact of neutrality rules on customers:**

- Higher ticket prices;
- Lower frequency of flights;
- Lower number of destination routes for short, medium and long distance flights;
- More disadvantages in the case of overseas travel or with stopovers. Passengers could face further difficulties related to luggage transport, scheduling to shorten waiting times or securing all documents in time to fly;
- Holiday packages that include flight tickets would become less attractive;
- Less variety of additional services before, during and after the flight;
- Higher prices for customers who plan their trips in advance. Therefore, less incentive to do so making it harder for companies to schedule, which in turn leads to higher cost.

The specific effects of each marketing strategy on customers are shown in Table 1.

Table 1: Summary of marketing practices that would be prohibited if "neutrality rules" are applied and their impact on consumers

Business Strategy	Restrictions arising from neutrality rules	Impact on consumers
Discounts based on customer profile: ***Loyalty cards;*** ***Promotions for groups and companies;*** ***Discounts for young people and students.***	All customers must pay the same price for comparable flights: *Discriminatory practices based on customer profile, the number of tickets purchased or time of year would be prohibited.* *No discounts permitted on seats in the same class.*	· No discounts for large families or groups; · No incentive for bulk reservations entailing large sums of money; · Less incentive for customer loyalty; · No discounts for frequent flyers; · Higher prices for airline tickets; · Fewer routes / destinations offered and lower quality of service.
Volume discounts: ***Discounts for booking amounts that exceed a certain threshold;*** ***Discounts for families that all book at the same time.***		
Prices based on seasonality of demand: ***High (low) prices in high (low) season;*** ***Lower prices on Tuesdays and Wednesdays.***		
Complementary or extra services: ***Possibility of priority boarding or Premium seats;*** ***Discounts on checked baggage.***	Uniform conditions imposed on transport services and passenger treatment: *The price of airline tickets must include the same types of services and the same treatment.*	· Fewer complementary services.
Discounts: ***For early bookings;*** ***For last minute bookings.***	Uniform conditions imposed on the purchase of airline tickets: *No discounts or promotions allowed for early or last minute booking.*	· Higher prices because airlines lose the instruments needed to effectively manage the occupancy rates of their aircraft.
Prices depending on method of payment or where the ticket is purchased: ***Surcharges for credit card payment;*** ***Lower prices for ticket purchases through the airline's web page.***	All market participants should be treated equally: *No differentiation made in customer treatment, regardless of the means of payment used or place of ticket purchase.*	· Lost access to certain discounts based on the method or manner of purchase.
Agreements with other transport companies: ***Combined air-rail and air-bus tickets.***	All market participants should be treated equally: *There can be no differentiation in the conditions applied to passengers.*	· Higher fares for combined transportation; · Less variety in transportation services;

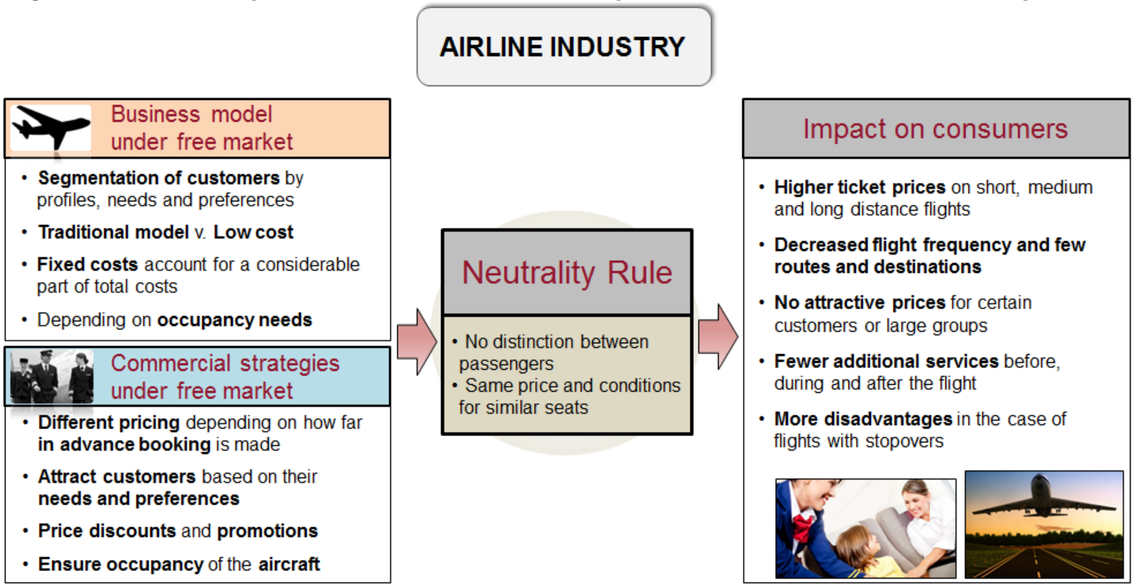
Discounts and special services for passengers on connecting flights: ***Price discounts for connecting flights;*** ***Integrated checked baggage service and boarding pass delivery.***	All market participants should be treated equally: *No differentiation in the treatment of passengers or ticket price, regardless of the route (direct or with stopovers).*	· Higher fares on routes with stopovers; · Fewer routes and destinations available; · Greater difficulties related to checked luggage transport, scheduling to shorten waiting times or securing all documents needed to fly.

Main results and conclusions

If neutrality rules were imposed on the airline industry, airlines would no longer be able to offer price reductions, special promotions or additional services over and above air transport through tour operators, hotels or transportation companies with which they have agreements.

Airlines would therefore have fewer tools with which to efficiently manage the occupancy of their aircraft and this would heighten operational risk. Airlines would require higher returns on investment to offset this risk, forcing them to raise prices. As a result, customers would have less access to air transport and the market would be inaccessible for some of them.

Figure 2: Summary of the effect of "neutrality rules" on the airline industry



2. ANNEX I: DESCRIPTION OF THE BUSINESS MODEL USED BY THE AIRLINE INDUSTRY

The air transport sector is an important generator of wealth and employment in Spain. In 2013 this sector accounted for 7% of Spanish GDP and, according to the INE (Spanish statistics office), an estimated 39,500 people are employed by this sector in Spain. According to official figures,[1] in 2013 nearly 195 million passengers took flights in which at least one of the airports was Spanish. 56.8% of these passengers opted to fly with so-called low cost airlines[2] (Of which 21.8% were domestic passengers), while the remaining 43.2% chose conventional companies (40% being domestic passengers). Globally, data show that 56% of travellers flew for pleasure, 30% to visit friends or relatives, and the remaining 14% did so for business purposes.

In 2013, airlines forming part of the International Air Transport Association[3] had a turnover of EUR 9.2 billion, an average occupancy rate of 80% and average profit margin of 1.5%, although with major differences between countries.

i) Description of the business model, analysis of the relevant market and customer profiles

Airlines are companies that provide transportation services. Within the commercial aviation segment, airlines provide services ranging from simple ticket sales, including baggage or not, to in-flight catering or complementary services such as priority boarding, seat selection or transfer from/to airport terminals.

The **business model** in the commercial airline industry has undergone major changes since liberalization at EU level in 1997. Airlines today typically use a large number of commercial strategies to maximize the occupancy of their aircraft and optimize the amount of time they are in the air by doing everything they can to avoid empty seats and planes on the ground in order to cover the high overhead faced by companies operating in this sector.

Airlines achieve these goals by analysing the profile of their customers (and differentiating among them in a variety of ways), assessing the routes they operate and establishing strategic alliances with other companies.

Also, the arrival of new players and the merger and acquisition process that traditional companies are undergoing have given rise to a highly specialised and competitive market in terms of customers and destinations.

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[1] Ministry of Public Works. Data regarding air transport in Spain.

[2] These are new generation companies which differ from traditional companies in that they offer cheaper fares. This concept will be explained further on.

[3] IATA includes over 250 airlines accounting for 84% of world air traffic.

The **supply structure** in the commercial aviation sector is made up of airlines with heterogeneous characteristics. The number of companies operating in a given location usually depends on the strategic importance of that area for tourism or business, and market size. A company's target market typically depends on its size and could be determined by: flight type (geographical area of the route, duration, etc.), type of customer (business or pleasure) and its partnership with a transport or tourist service company. Therefore, depending on its geographical influence and the size of the route network it operates, we can distinguish between various types of companies, although some may belong to more than one group:

a) **Regional** airlines. Companies in this category have smaller aircraft and operate short, high-frequency routes. Most of the so-called low cost airlines fall into this category.

b) **Network airlines**. These companies have a wide and diverse fleet, their routes combine short, medium and long distance flights and their network is organised around hub airports; it includes flagship airlines (the most relevant airlines in a given country).

c) **Large-**scale **airlines.** These companies have high-capacity aircraft, make long, transcontinental flights and fly in and out of the world's major international airports.

Also, the emergence of low cost companies and the merger and acquisition process has given rise to a highly specialised and competitive market in terms of customers and destinations. In this market, a distinction can be drawn between:

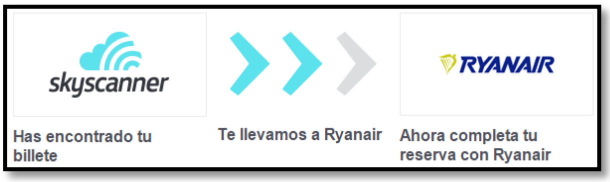
I. **The traditional model**. This encompasses network and large-scale companies, their core business being the sale of airline tickets and the income this generates. These airlines used to have large structures, but maintenance difficulties led many of them to restructure or join groups of airlines and they have evolved towards a hybrid business model which is somewhere between their former situation and low cost services; or they have created their own subsidiaries. Examples of this process include: Air France-KLM or Iberia-BA-AA, the latter also positioning itself in the low-cost segment with its subsidiary called Iberia Express.

II. **Low cost** model. This encompasses regional companies. Unlike traditional airlines, an important part of their income comes from the sale of additional services other than airline tickets such as: baggage transport, seat reservation, travel insurance, catering, boutique products, etc. In order to maintain their level of competitiveness, these companies employ practices such as: elimination of intermediaries for ticket sales and complementary services (they use their own web pages), maximisation of fixed assets (increased flight frequency) and operational savings (operating out of remote airports, embarking and disembarking on the runway and a homogeneous fleet of aircraft). Their entry into the market sparked a significant reduction in ticket prices and an increase in the frequency and number of passengers.[4] Examples of such airlines are EasyJet, Ryanair and Vueling.

The following **intermediaries** operating in the sector can also be identified:

- **Tour** operators. This group includes both tour operators and travel agencies. These companies act as end customers purchasing seats to include in their holiday packages that, in turn, are sold to travellers. These operators generally establish agreements with airlines to reserve a certain number of seats that they usually get at a discount. Sometimes these operators are vertically integrated in large tourism companies as is the case with TUI AG.

- **Online portals offering** flight ticket comparison and sale. These are retailers that sell airline tickets mainly to end customers. Airlines link with these portals in two different ways. First, there are platforms that sell third-party tickets for commission. Airlines accept this as compensation for sales made outside of their booking mechanisms. Secondly, there are search engines that redirect customers to the airline website once they have selected an offer. In this case there is no commission because it is tacitly understood as a *win-win* situation. There is a possible third scenario where airlines supply seats to online portals at a lower price than they themselves offer, which then allows them to include an intermediation margin in the price as compensation for their services. These portals also earn revenue from fees charged to companies for offering combined services (e.g. flight + hotel or flight + car) and for online advertising.



Meanwhile, **airline customers** are traditionally divided into two categories: business and pleasure. These two groups can easily be distinguished as they generally have different travel patterns. For example, business customers generally have less flexibility to postpone or cancel their trip and place a higher priority on speed, punctuality and connectivity. In this respect, one of the key variables for choosing an airline is price, but there are other variables such as flight frequency, location of the airport of destination, additional services and the quality of customer service provided by the airline.

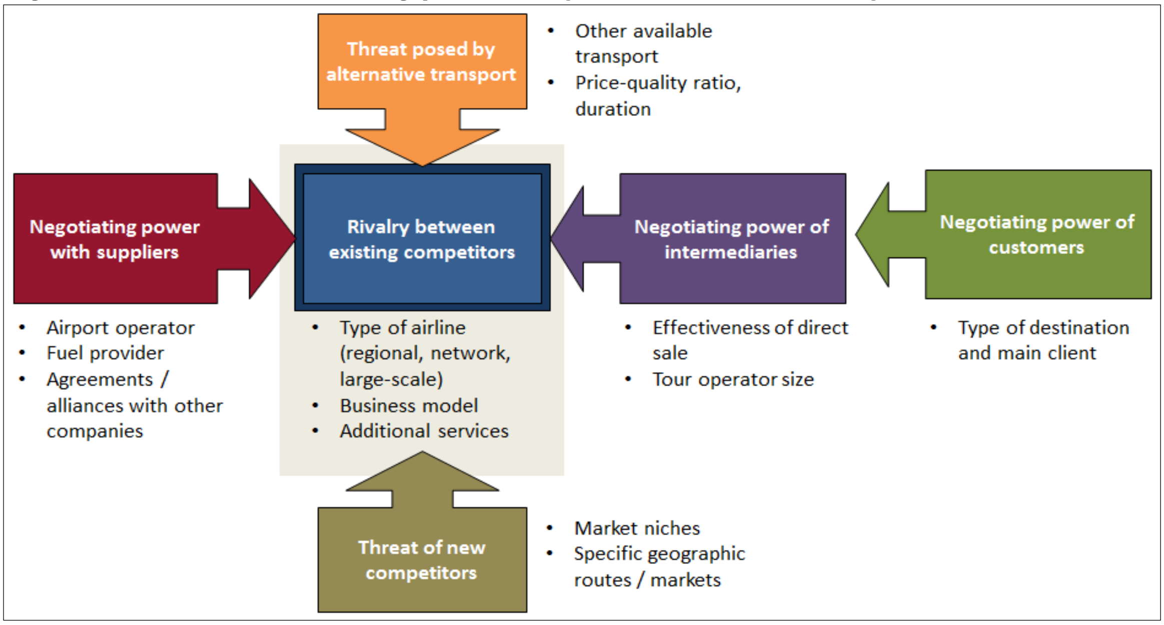
The commercial airline industry has high barriers to entry, which means that new competitors encounter greater difficulties entering the market and operating at major airports. However, the most important limitation is the need to achieve sufficient scale so as to be able to compete with the major airlines and this requires a considerable investment in aircraft either through direct purchase or leasing.

Each airline establishes its routes in accordance with their business strategy and the

[4] AENA (Spanish airports and aerial navigation). Traffic statistics.

flow of passengers in the countries where they operate. This does not exclude strategic alliances between companies to facilitate air links, cover long-haul routes and reduce service costs. Examples are *Oneworld* and *SkyTeam.*

Figure 1. Factors determining profitability in the airline industry



Source: *IATA (2011) and own data.*

ii) Maximizing revenues and costs

Airlines offer their services to end customers and tour operators. End customers are mainly tourists and business travellers. In economic terms, optimizing occupancy levels of aircraft can cover overhead and allow airlines to maximise profits.

The main source of income for the airline industry comes from the sale of airline tickets. The price of these tickets usually depends on the class in which a passenger travels. Traditionally there are three different classes: economy, business and first class, although some airlines use different nomenclature. First class offers more services and may cost several times the price of an economy class ticket on the same flight. Business class, halfway between first class and economy, also offers additional services not available to economy class passengers.

Airlines also receive substantial revenues from baggage check and other related services, both before and during the flight. Additional services generally offered by airlines include: seat reservation, flight data via text message to mobile phones, low cost parking services, transfer to/from airport terminals, travel insurance, purchase of tickets for entertainment events at destination, etc. These are usually charged separately from the price of the flight ticket and therefore can be better adapted to customer needs.

The main expenses are related to operations (fuel, maintenance and financing of aircraft, payroll, etc.), marketing campaigns in traditional and online media and the fees that airlines have to pay to use airport facilities. Airport operators charge fees for air traffic services, safety and accident prevention, use of infrastructure (check-in counters), parking (hangars and warehouses), use of runways, cargo handling, etc. The sum total of these fees, which is usually stipulated in the breakdown of the ticket price paid by customers, could even exceed the ticket price. These fees are sometimes viewed as airlines acting as collectors for the airport and not costs in a strict sense of the term.

In general, fixed costs account for a high percentage of total costs and pose a significant barrier to entry to the air passenger transport sector.

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