

**BEFORE THE
U.S. DEPARTMENT OF TRANSPORTATION
WASHINGTON, D.C.**

Docket No. 2022-0089

**Notice of Proposed Rulemaking
Airline Ticket Refunds and Consumer Protections**

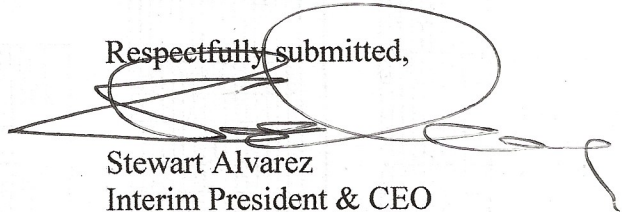
The Travel Technology Association, the American Society of Travel Advisors, and Monument Advocacy, each of which represents the interests of ticket agents and other entities involved in the distribution of airline services (“Distribution Petitioners”), hereby respectfully request a minimum thirty day extension of the comment period in the August 22, 2022 Notice of Proposed Rulemaking initiating this proceeding (“Notice”). As the Department is well-aware, this proceeding gives rise to a substantial number of issues, in fact over 100 issues, which are identified for comment in the 31-page Federal Register version of the Notice published at 87 Fed. Reg. 51550. Distribution Petitioners have begun the process of assessing those issues with their respective members and of determining what points they wish to address in their comments and the positions they plan to take. However, given the number of issues and the nature of the issues, it is clear that this process will take considerable time. The issues pertaining to public health emergencies are particularly novel in terms of the regulatory response proposed and thus require careful consideration by the Distribution Petitioners.

Further, Distribution Petitioners are aware that Airlines for America and the International Air Transport Association have, in their September 6, 2022 request for additional time to submit comments, posed a series of questions to the Department seeking clarification of certain issues raised in the Notice. Several of those issues are of particular interest to the Distribution Petitioners, including the Department’s views on the issue of what constitutes a significant change in itinerary and questions pertaining to vouchers and refunds. The Distribution Petitioners assume that the Department may issue some form of supplemental Notice or other document providing the requested clarifications of its proposals. However, the uncertainty of when and whether that will happen or how the Department may respond to the requested clarifications is slowing the Distribution Petitioners in assessing their responses to the Notice. Additional time would thus be helpful to assess their positions in view of any forthcoming clarifications.

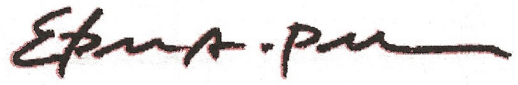
While Petitioners appreciate that the Department has provided a 90 day comment period, it appears that at least an additional thirty day extension, as well as receipt of the Department’s response to the requested clarifications, will allow each of the Distribution Petitioners to develop and prepare comments that will be most useful for the Department in reaching a fully-informed decision.

For these reasons, the Distribution Petitioners respectfully urge the Department to provide a minimum additional 30 days for comment in this proceeding.

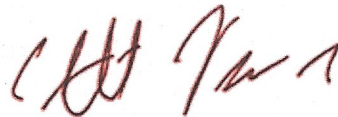
Respectfully submitted,

A handwritten signature in black ink, appearing to read 'Stewart Alvarez', written over the text 'Respectfully submitted,'.

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