

BEFORE THE  
OFFICE OF THE SECRETARY  
U.S. DEPARTMENT OF TRANSPORTATION  
WASHINGTON, DC

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Transparency of Airline Ancillary Fees  
and Other Consumer Protection Issues

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Docket: DOT-OST-2014-0056

APPENDIX D TO COMMENTS OF  
TRAVELERS UNITED, INC.  
(FORMERLY CONSUMER TRAVEL ALLIANCE)

JOINED BY THE NATIONAL CONSUMERS LEAGUE

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September 29, 2014

## Appendix D – Screenshots of airline websites

This series of screenshots take a reader through American Airlines' online screens, showing the various reservation fees and the fact that baggage fees are not displayed on any main screen (only via a link), nor are offered for sale at any time during the booking process. Plus, the data available on the baggage screens is not passenger-specific. Passengers are left to either know in advance their status and costs of baggage or will be surprised later when baggage fees are revealed during check-in. Seat reservation fees make no logical sense. Airlines seem to charge what they can. One price in one direction and another price on the return.

This an extra legroom seat from DCA to Phoenix — Cost \$89.  
From Phoenix to Boise — Cost \$25.  
From Boise to Phoenix — Cost \$37.  
From Phoenix to DCA — \$67.

What is a consumer to do when trying to comparison shop?

The screenshot shows the American Airlines website interface for selecting a seat on flight #495. The page is titled "Choose your seat" and features a navigation bar with options like "Find Flights", "Choose Flights", "Travelers", "Select Seats", "Review & Pay", and "Final".

Flight options are listed as follows:

- DCA to PHX Flight #495 (Selected)
- PHX to BOI Flight #625
- BOI to PHX Flight #594
- PHX to DCA Flight #498

Passenger information shows "CHARLES LEOCHA" as the passenger and "unassigned" as the seat. The flight is operated by US Airways on an Airbus Industrie A321.

The seat map shows a 12x3 layout with an exit row in the middle. The legend indicates that ChoiceSeats are available for \$89 USD. The map shows several seats marked with "ChoiceSeats" (green stars) and "Available" (blue squares). The exit row is marked "EXIT" and is unavailable.

US Airways seats terms and conditions are also visible.

# Choose your seat

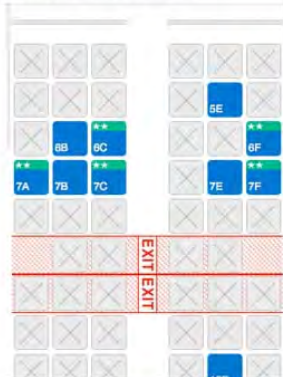
- DCA to PHX Flight #495
- PHX to BOI Flight #625
- BOI to PHX Flight #594**
- PHX to DCA Flight #498

Passenger **CHARLES LEOCHA**  
Seat **16F**

Operated by US Airways  
Flight #625 - Airbus Industrie A319

Legend

**ChoiceSeats**  
Standard legroom toward the front of the Main Cabin.  
ChoiceSeats charges apply to all customers, including all AAdvantage elite and Dividend Miles Preferred members.



- ChoiceSeats**
- Green with \*\*: \$25 USD
  - Blue: Available
  - Dark Blue: Selected
  - Grey with X: Unavailable
- US Airways seats terms and conditions

# Choose your seat

- DCA to PHX Flight #495
- PHX to BOI Flight #625
- BOI to PHX Flight #594**
- PHX to DCA Flight #498

Passenger **CHARLES LEOCHA**  
unassigned  
Seat --

Operated by US Airways  
Flight #594 - Airbus Industrie A319

Legend

**ChoiceSeats**  
Standard legroom toward the front of the Main Cabin.  
ChoiceSeats charges apply to all customers, including all AAdvantage elite and Dividend Miles Preferred members.



- ChoiceSeats**
- Green with \*\*: \$37 USD
  - Blue: Available
  - Dark Blue: Selected
  - Grey with X: Unavailable
- US Airways seats terms and conditions

## Choose your seat

DCA to PHX Flight #495 PHX to BOI Flight #625 BOI to PHX Flight #594 **PHX to DCA Flight #498**

Passenger **CHARLES LEOCHA**  
unassigned

Seat -- Operated by US Airways  
Flight #498 - Airbus Industrie A319

Legend

**ChoiceSeats**  
 \$67 USD  
 Available  
 Selected  
 Unavailable  
[US Airways seats terms and conditions](#)

Seats on US Airways  
This flight is operated by US Airways.  
Choose standard seats or ChoiceSeats.

**ChoiceSeats**  
Standard legroom toward the front of the Main Cabin.  
ChoiceSeats charges apply to all customers, including all AAAdvantage elite and Dividend Miles Preferred members.



So far, seat reservation fees have varied on every flight. The only way to get this data is to work oneself through the booking process screen by screen. Now, below is the review and pay page. It has no baggage fees available other than through another link. And even there, passengers cannot pay for baggage at the time of booking.

We are experiencing technical difficulties with your seat assignment at this time. Please try again later.

Flight	Depart	Arrive	
<b>American Airlines 495</b> Operated by US Airways	<b>Washington (DCA)</b> October 15, 2014 07:00 AM Travel Time : 5 h 9 m Cabin Class : Economy Seat : unassigned	<b>Phoenix (PHX)</b> October 15, 2014 09:09 AM Booking Code : V Plane Type : 321	<a href="#">Choose Seats</a>
<b>American Airlines 625</b> Operated by US Airways	<b>Phoenix (PHX)</b> October 15, 2014 09:49 AM Travel Time : 2 h 5 m Cabin Class : Economy Seat : unassigned	<b>Boise (BOI)</b> October 15, 2014 12:54 PM Booking Code : Q Plane Type : 319	<a href="#">Choose Seats</a>
<b>American Airlines 594</b> Operated by US Airways	<b>Boise (BOI)</b> July 18, 2015 01:31 PM Travel Time : 1 h 57 m Cabin Class : Economy	<b>Phoenix (PHX)</b> July 18, 2015 02:28 PM Booking Code : N Plane Type : 319	

**Your Trip Price:**  
**\$1,113.50 USD**  
[Baggage and Optional Charges](#)

**Fare Amount**  
Adult  
1 x \$993.76 USD    \$993.76 USD

**Taxes & Carrier-Imposed Fees**  
Taxes    \$119.74 USD  
Carrier-Imposed Fees    \$0.00 USD  
[Price and Tax Information](#)

**Flight Subtotal**  
**\$1,113.50 USD**

On the last page before paying, there is still only a link to baggage fees and that link is not passenger-specific.

[View Fare Rules](#)

- Flights not on American Airlines, American Eagle, or AmericanConnection® are on a [request basis](#) only. Fares and availability are subject to change.
- In order to comply with federal security regulations, we may provide government agencies access to data you disclose to us.
- If you choose to pay using a U.K.-billed credit card or U.K.-billed PayPal account, a processing fee of £4.50 per ticket may apply. Payments with debit cards are exempt from this fee.
- [Optional Services and Carrier Charges](#) include, but are not limited to, items such as checked or carry-on baggage, seat selection and seat upgrades.
- First/Business Fares may be an Instant Upgrade and therefore subject to restrictions.

[Flight Information Questions?](#)

Your Trip Price:  
**\$1,113.50 USD**  
[Baggage and Optional Charges](#)

## DELTA AIR LINES

Again, Delta offers no listing of baggage fees other than through pop-up making discovering them more difficult and foiling comparison shopping.

**DELTA**

HOME | SUPPORT | COMMENT/COMPLAINT? | LOG IN

SHOP | TRAVELING WITH US | SKYMILES | Search

1 Search Flights | 2 Select Trip | 3 Passenger Info | 4 **Review/Purchase** | 5 Done

**REVIEW & PURCHASE**

**YOU SELECTED THESE FLIGHTS:**

**OUTBOUND** Wed, 15 Oct 2014 | 7:35AM DCA to 12:10PM BOI | 1-Stop | DL 691, DL 2066

7:35AM	DCA	12:10PM	BOI	1-Stop	6 hr 35 min	DL 691	Economy (X)	Select Seat
				SLC	50m Layover	DL 2066	Economy (X)	Select Seat


[Complete Delta Air Lines Baggage Information](#)

**RETURN** Sat, 18 Oct 2014 | 9:30AM BOI to 6:26PM DCA | 1-Stop | DL 1503, DL 1664

9:30AM	BOI	6:26PM	DCA	1-Stop	6 hr 56 min	DL 1503	Economy (X)	Select Seat
				MSP	1h 58m Layover	DL 1664	Economy (X)	Select Seat

[Complete Delta Air Lines Baggage Information](#)

In-Flight services and amenities may vary and are subject to change.



Total balance due: **\$391.20 (USD)**


Book with confidence. See Delta's Best Fare Guarantee.

**▼ COST DETAILS**

Passenger	Total Fare	Subtotal
Charles Leocha	\$391.20 (USD)	\$391.20 (USD)

[View fare rules](#) | [View Detailed Charges](#)

Here is the booking page for Delta Air Lines. Again, note there are no baggage fees other than through another link. One more step in making discovery of these particular ancillary fees difficult. On this booking Delta did not offer a seating map as part of the booking process.

**DELTA** 

HOME | ENGLISH | SUPPORT | COMMENT/COMPLAINT | LOG IN

SHOP | TRAVELING WITH US | SKYMILES | Search

# BOOK A TRIP

1 Search Flights | 2 Select Trip | 3 Passenger Info | 4 Review/Purchase | 5 Done

Wednesday, October 15, 2014 | 1 Passenger

## Outbound: DCA ▶ BOI

Washington-Reagan National, DC (DCA) to Boise, ID (BOI)

**UPGRADE TO ECONOMY COMFORT™**  
Enjoy more legroom and priority boarding for as low as \$9. [LEARN MORE](#)  
\*Subject to availability. \*\*Additional fees may apply.

Round-trip prices per person are shown below and are subject to change prior to the time you receive confirmation that your credit card has been accepted. The Total Price includes taxes and carrier-imposed fees. There may be additional fees for your carry-on/checked baggage and fees may differ per operating carrier.

**Outbound Flights** 1-20 of 50 flight results: <1 | 2 | 3 > [Show All](#)

VIEW FLIGHTS BASED ON:  
 Price (Best Only)  
 Schedule (All flights)


**FIND FLIGHTS**

Advanced Search Flexible Dates

**FILTER RESULTS**  
 Return to Default Settings

**STOPS**  
 1 stop  
 Multi-stop

**CONNECTION AIRPORT**  
 Atlanta, GA (ATL)  
 Cincinnati, OH (CVG)

FLIGHT	CLASS	PRICE
6:30AM ▶ 11:19AM DL 2163 1 stop 6h 49m DL 5689 <sup>1</sup> MSP 1h 5m Operated by: <sup>1</sup> Compass DBA Delta Connection SP 	ECONOMY	\$391.20
	FIRST/BUSINESS	\$1,024.20
7:35AM ▶ 12:10PM DL 691 1 stop 6h 35m DL 2066 SLC 50m	ECONOMY	\$391.20
	FIRST/BUSINESS	\$1,024.20

# UNITED AIRLINES

After six screens passengers have no way to get passenger-specific baggage fees, even via the pop-up, after filling in name, sex and birthday. Again, United Airlines as does American and Delta, fails to provide basic passenger-specific accessible baggage information.

**UNITED** A STAR ALLIANCE MEMBER

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SEARCH FLIGHTS → CHOOSE FLIGHTS → TRIP ITINERARY → TRAVELER INFORMATION → COMPLETE PURCHASE → CONFIRMATION

**Select Departing Flight**

Round Trip (Start New Search)  
 Depart **Washington, DC (DCA - National)**  
 Arrive **Boise, ID (BOI)**  
 Date **Wed., Oct. 15, 2014** Time **Anytime**  
 Cabin **Economy** Travelers **1**

Miles make vacations happen.  
 30,000 bonus miles + \$50 statement credit [Learn More](#)

**OUR LOWEST FARES**  
 Buy Now — limited tickets at our lowest price

<b>With Stops</b> from <b>\$392</b>	<b>Flexible Fare</b> from <b>\$1,098</b>	<b>First Cabin</b> from <b>\$890</b>
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United's **FareLock** service allows you to hold your itinerary and fare for 72 hours or seven days, for a fee, and is available on select flights. So go ahead and book your flight while you complete and confirm your travel plans. Our FareLock service will guarantee an available seat and the fare you were quoted at the time you booked your reservation.

Fares listed are for the entire trip per person and include [taxes and fees](#). [Additional bag charges may apply](#).  
 The fare displayed is the lowest available for the dates requested; however some flights may not be in the cabin you requested.  
 United flights include those operated by our Express partners.

Price	Departing	Arriving	Travel Time	Distance*	
<b>United Flights with stops from \$392</b>					
from <b>\$392</b> <a href="#">Select</a>  FareLock	Depart: <b>7:45 a.m.</b> <b>Wed., Oct. 15, 2014</b> Washington, DC (DCA - National)	Arrive: <b>8:44 a.m.</b> <b>Wed., Oct. 15, 2014</b> Chicago, IL (ORD - O'Hare)	Flight Time: 1 hr 59 mn	Distance: <b>612 miles</b>	Flight: <b>UA627</b> Aircraft: <b>Airbus A320</b> Fare Class: <b>United Economy (L)</b> Meal: <b>None</b> <a href="#">See On-Time Performance</a> <a href="#">View Seats</a>
Change Planes. Connect time in Chicago, IL (ORD - O'Hare) is 1 hour 1 minute.					
	Depart: <b>9:45 a.m.</b> <b>Wed., Oct. 15, 2014</b> Chicago, IL (ORD - O'Hare)	Arrive: <b>12:23 p.m.</b> <b>Wed., Oct. 15, 2014</b> Boise, ID (BOI)	Flight Time: 3 hr 38 mn Travel Time: <b>6 hr 38 mn</b>	Distance: 1,437 miles Total Distance: <b>2,049 miles</b>	Flight: <b>UA3707</b> Operated by GOJET AIRLINES DBA UNITED EXPRESS. Aircraft: <b>Canadair Regional Jet 700</b> Fare Class: <b>United Economy (L)</b> Meal: <b>Snacks for Purchase</b> <b>No Special Meal Offered.</b> <a href="#">See On-Time Performance</a> <a href="#">View Seats</a>
from <b>\$392</b> <a href="#">Select</a> 	Depart: <b>3:42 p.m.</b> <b>Wed., Oct. 15, 2014</b> Washington, DC (DCA - National)	Arrive: <b>4:48 p.m.</b> <b>Wed., Oct. 15, 2014</b> Chicago, IL (ORD - O'Hare)	Flight Time: 2 hr 6 mn	Distance: <b>612 miles</b>	Flight: <b>UA5494</b> Operated by SKYWEST DBA UNITED EXPRESS. Aircraft: <b>Canadair Regional Jet 700</b> Fare Class: <b>United Economy (L)</b> Meal: <b>None</b>

Review Trip Itinerary

<p><b>Fare Details</b></p> <p>1 Adult (18-64) <b>\$346.00</b></p> <p>Additional Taxes/Fees <b>\$45.20</b></p> <p><b>Total \$391.20</b></p>			<p><b>Total Ticket Price \$391.20</b></p>
			<p>Card Statement Credit <b>-\$50.00</b></p> <p><b>Total After Statement Credit \$341.20</b></p>

**Flexible Fare for \$706.00 more**

Choose this fare to take advantage of additional flexibility:

- Lowest-available refundable fare
- Fee-waived same-day flight changes (when available)
- Change fees and cancellation fees may apply
- Advance purchase may be required

[Increase Ticket Flexibility](#)

**Upgrade to First for \$498.00 more**

Choose this fare and enjoy these additional benefits:

- Wider seats with extra legroom
- Complimentary beer, wine and spirits
- Upgraded meals and snacks, when offered
- At least two standard-sized checked bags up to 70 lbs. with all fees waived
- MileagePlus bonus Premier qualifying miles
- Premier Access travel services, including priority check-in, security checkpoint lanes (where available), boarding and baggage handling

[Upgrade](#)

**Flight Details**

<p>→ <b>Wed., Oct. 15, 2014   Washington, DC (DCA - National) to Boise, ID (BOI)</b></p>				
<p>Depart: <b>7:45 a.m.</b> Wed., Oct. 15, 2014 Washington, DC (DCA - National)</p>	<p>Arrive: <b>8:44 a.m.</b> Wed., Oct. 15, 2014 Chicago, IL (ORD - O'Hare)</p>	<p>Flight Time: <b>1 hr 59 mn</b></p>	<p>Distance: <b>612 miles</b></p>	<p>Flight: <b>UA627</b> Aircraft: <b>Airbus A320</b> Fare Class: <b>United Economy (L)</b> Meal: <b>None</b> <b>No Special Meal Offered.</b></p>
<p><b>Change Planes.</b> Connect time in Chicago, IL (ORD - O'Hare) is 1 hour 1 minute.</p>				
<p>Depart: <b>9:45 a.m.</b> Wed., Oct. 15, 2014 Chicago, IL (ORD - O'Hare)</p>	<p>Arrive: <b>12:23 p.m.</b> Wed., Oct. 15, 2014 Boise, ID (BOI)</p>	<p>Flight Time: <b>3 hr 38 mn</b> Travel Time: <b>6 hr 38 mn</b></p>	<p>Distance: <b>1,437 miles</b> Total Distance: <b>2,049 miles</b></p>	<p>Flight: <b>UA3707</b> Operated by GOJET AIRLINES DBA UNITED EXPRESS Aircraft: <b>Canadair Regional Jet 700</b> Fare Class: <b>United Economy (L)</b> Meal: <b>Snacks for Purchase</b> <b>No Special Meal Offered.</b></p>
<p>← <b>Sat., Oct. 18, 2014   Boise, ID (BOI) to Washington, DC (DCA - National)</b></p>				



### Seat Map

To change your seat assignment for specific flights:

- Select the appropriate flight tab.
- For specific travelers, first select the traveler, then select an available seat from the map.

Your seat is not confirmed until you select continue.

DCA - ORD  
UA627

ORD - BOI  
UA3707

**BOI - DEN**  
UA1070

DEN - DCA  
UA484



Sat., Oct. 18, 2014 | Boise, ID (BOI) to Denver, CO (DEN)

3 of 4 Flights



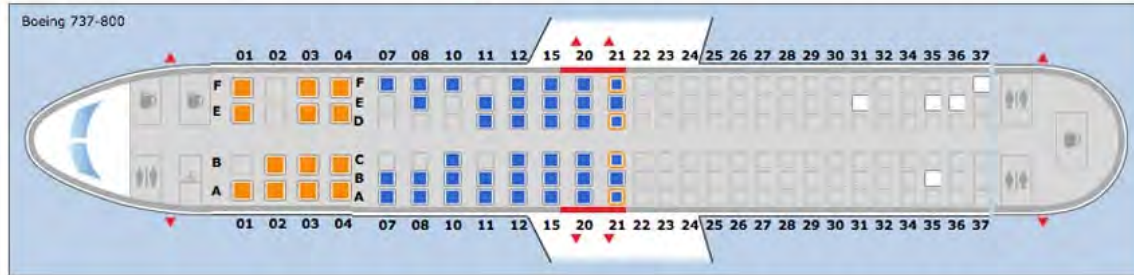
Travelers

Select an available seat for the traveler.

1 Charles Leocha

- Available United First®
- Available Economy Plus®
- "Best Available" Economy Plus®
- Available United Economy®
- Occupied/Unavailable
- Exit Door
- Exit Row

"Best available" is determined by a combination of legroom, proximity to the front of the cabin and seat price. Seat changes are not confirmed until you select continue or select another flight.



Payment Information

**! We could not process your request. Please see the message below and make revisions.**

The fare and payment options below are based on selected flights, traveler information and a **United States** billing address. Have a billing address in another country? [Select your billing address country.](#) Any change made may result in a different fare and available payment options.

United reserves the right to remove a passenger from an Economy Plus seat for any reason. If this occurs and a new boarding pass is issued with a seat assignment not designated as Economy Plus, a refund will automatically be processed to the original form of payment. If a new boarding pass is not issued, please request a refund at united.com.

**Flight Details**

→ **Wed., Oct. 15, 2014 | Washington, DC (DCA - National) to Boise, ID (BOI)**

← **Sat., Oct. 18, 2014 | Boise, ID (BOI) to Washington, DC (DCA - National)**

Traveler(s): **Mr. Charles Leocha**  
[Edit traveler\(s\)](#)

**Purchase Summary**

<b>Ticket Price</b>	
1 Adult (18-64)	\$346.00
Additional <a href="#">Taxes/Fees</a>	\$45.20
<b>Price Details</b>	
Economy Plus	\$231.00
<b>Total</b>	<b>\$622.20</b>

Recommended Add-ons

Take the fast track through the airport

**Add Premier Access for \$111**

Premier Access benefits include:

- Priority boarding
- Priority check-in line
- Priority security line (where available)

[Terms and conditions](#)

Or select individual flight segments

**Terms and Conditions**

Any changes or cancellations must be made prior to scheduled departure; otherwise, the ticket value will be forfeited. The value of this ticket is valid for up to one year from the date when the ticket was originally issued, or according to the fare rules of the purchased fare, whichever is most restrictive.

- **If you are planning to check bags:** Please review our [baggage policies](#) to determine if any service charges apply.
- **Your ticket is a contract.** Your travel is subject to United's [Contract of Carriage](#).
- Federal law forbids the carriage of hazardous materials aboard aircraft. Please

**Highly Recommended: Trip Protection**

**! Make a selection for Travel Insurance to continue.**

Yes, Add Trip Protector for **\$21.52** covering all passengers in this reservation.

Over 16 million travelers insured in 2013.

**I agree - Continue to Purchase**

Purchase of this ticket means you agree to all [rules](#) associated with this non-refundable ticket, all [terms and conditions](#) associated with any additional offer/product purchases made, and the terms and conditions in United's [contract of carriage](#).

With every airline website, consumers must go through the entire reservation process to even have access to the basic ancillary fees such as seat reservation fees and baggage fees. In the case of baggage fees, passengers are provided no option to purchase this service at the same time as they purchase airfare unless a traveler uses a package of services for a set fee from American Airlines.