## Peter Read Consultancy Ltd.

Sustainable Energy Technology Promotion 102, No 1 Line, RD5, Palmerston North, New Zealand Tels: 06 355 9194; 04 473 3170. GST 70-391-899

Ms. Janet Whiteside Chief Adviser Market Structure Group Business Competition Branch P O Box 2351 Wellington

11<sup>th</sup> February

Submission to the Commerce Commission in relation to:

COMMERCE ACT 1986 - SECTION 58 APPLICATION BY AIR NEW ZEALAND LIMITED AND QANTAS AIRWAYS LIMITED

Madam,

I am a consultant in the field of climate change strategy and related matters, which work involves me in attending meetings and conferences overseas. In recent years this has taken me round the world, or to Europe and back usually via the USA, about five times annually. Travel costs have represented about [] per cent of my small firm's turnover. In these circumstances, the maintenance of effective competition in the cross-Pacific route is of very great concern to me. I do not believe this can happen under the proposed strategic alliance, particularly now that United Airlines are dropping this route.

Additionally Air New Zealand is a member of what is widely regarded as the world's most satisfactory international airline partnership, the Star Alliance. It seems obvious that, under the proposed strategic alliance, Air New Zealand will come under pressure from Qantas to transfer its membership to the One World Alliance of which Qantas is a leading member. This will mean that New Zealanders will be cut off from completing the trans-Pacific leg of the world beating round-the-world ticketing arrangement which the Star Alliance offers, greatly to the detriment of many New Zealand travelers like myself who need route flexibility in getting to the varied locations that such activities as climate change conferences take place (Rio, Kyoto, Bonn, Johannesburg, Marrakesh, Delhi, etc).

Accordingly, Madam, I oppose the application and urge the Commerce Commission to decline the authorization sought.

Yours sincerely

Peter Read Managing Director