



The International Air Carrier Association

Emergency

MD

Brussels, 3rd August 2005

European Commission
Directorate-General for Energy and Transport
For the attention on Mr. Peter Faross
Head of Unit A5
Rue de la loi 200
B-1049 Brussels

fax : 02-298.65.40

DG TREN		CODE:				
A/ 19802						
04. 08. 2005						
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Dear Mr. Faross,

Concerns : Consultation on the rights of bus and coach passengers

The International Air Carrier Association (IACA) represents 37 member airlines serving the tourism industry. IACA members fly over 800 state-of-the-art, environmentally-efficient aircraft and directly employ over 50,000 people. Each year IACA airlines transport over 100 million passengers to 600 holiday destinations worldwide.

As an airline association, IACA would like to comment on the "Commission Staff Working Paper on the rights of passengers in international bus and coach transport".

The Commission intends to extend the existing air passenger rights to other transport modes. IACA is however surprised to note that the Commission fails to accurately summarize in the above Staff Working Paper the related Regulation (EC) No 261/2004 of 11th February 2004.

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If a flight is delayed by at least 5 hours, a passenger on that flight is not entitled to a rerouting. In such cases passenger rights are described in Article 8 (1) (a), whereas the rerouting is provided for in Articles 8 (1) (b) and (c). The text in the Commission Staff Working Paper is therefore incorrect.

IACA hence requests that the European Commission corrects its Staff Working Paper.

Yours sincerely,

A handwritten signature in black ink, consisting of a large, stylized 'S' followed by several loops and a long horizontal stroke extending to the right.

Sylviane Lust
Director General