

Introduction of axis travel centre south Australia.

Axis Travel Centre, established since 1978, has had a very long and established relationship with IATA and all major Airlines direct, as well as Cruise and Land travel suppliers.

Axis Travel Centre management has held executive positions on many advisory boards such as the AVIS Travel agents Advisory Board (21 Years), AFTA (SA. State Chairman and author of various AFTA training manuals), ATTRP (Australian President), AITT (Vice Chairman). American Express Travel Technology Council (Australia), American Express (WWCC worldwide training) and various past Qantas and Ansett advisory Boards-amongst others. Currently holding agency accreditations with IATA-TIDS, ATAS and CLIA.

We are unapologetic in having a view of the travel agent in this submission. It is constructive and reflective on travel agents perspective and heavily weighted with actual client facts, issues and relevant details from over 45 years of hands-on experience and expertise.

RESTRICTING FAIR COMPETITION: We believe that the continuation of any QF or EK joint partnership in its current form will detract from the choices and availability of fares, routes, choices and quality services available in the public domain by restricting other Airlines to travel routes under IATA agreements or IATA regions with a consolidation by both EK and QF to monopolise their joint routes. Having such strong market share allows QF/EK to also control the market prices that consumers pay -as we discover-that -coincidentally- other carriers increase their airfares also, usually in the same week, Consumers lose. Airlines win.

COMPLAINTS CONTINUE: In the past years QF and EK, especially QF have issued no realistic KPI or time limits to resolve consumer complaints where they are specifically at fault as verified by Travel Agents data and Computer reservation Systems facts and retrievable data

QF and EK must be held accountable for errors they make and pay higher levels of consumer compensation within a pre-set time limit set by ACCC back to both the travel agency and the consumer when they are at fault. Currently QF and EK can amend, cancel, rebook non-connecting flights with below standard compensation claims to consumers (especially when compared to European and USA Consumer compensation levels) and no monies payable towards travel agents who tend to do most of the behind-the-scenes work, 24 x 7.

NEED QF/EK CONTACTS : QF should streamline with EK, if a joint agreement is granted, a special Travel Agency contact base that we can communicate with 24 x 7 to rectify Airline initiated problems such as flight delays, cancellations, refunds, exchanges, specific errors and overall assistances as currently they do not have this facility via email or preferably phone systems although they market to us that they do and attempt to convince ACCC and Consumer Affairs that they do so via their websites. They do not offer an efficient system. A faster, more efficient manner of instant communications while clients are at Airports waiting or in transit needs to be structured. Time is of essence.

A GAME OF MONOPOLY: A monopoly of services to Dubai and from Dubai onwards to other ports would become even more evident if QF and EK were given extended rights against other carriers, such as Singapore Air, Cathay Pacific, Etihad etc. This will monopolise the industry sales and travel Agents would be placed into a tight and dark sales tunnel with no room to offer better value options to the consumer. QF and EK should not have exact same fare levels as this can be construed as collusion and each would therefore most probably do as they are now doing and offer the same fares to the public. In their current QF/EK platform they offer the travel agency network zero revenue or commissions which leaves that travel agency and therefore the consumer with no choice-under a monopoly situation-than to sell a zero revenue set of air tickets on the majority ruling QF/EK ensemble. We are unaware of any professional business that works for zero revenue, so we are concerned that a QF/EK relationship will strengthen their mutual stranglehold on this major issue. ACCC should place a ruling that QF/EK advise consumers of the worth of a travel agent in all their marketing and literature and/or the consumer should expect to pay a fee towards the travel agent of their choice who sell QF/EK products. This is not beyond the capabilities of an ACCC directive. COVID gave evidence to the worth of Agents who delivered, assisted, refunded, exchanged, amended and invested thousands of hours fixing Airline initiated problems plus Government Health Department (and acceptable) everchanging restrictions, with travel agents claiming zero or minimal revenue in doing so.

AN ADVISORY BOARD: A simple Travel Agency Advisory board should be setup with QF and EK senior management staff- *who can make decisions and not substandard employees-* ,established with say 10 members, 2 from each carrier and 5 travel agents of multinational status with 2 Independent agents, plus 1 ACCC member. This board should listen , advise, assist, establish and remedy problems that may exist , such as with fares, schedules, Frequent flyer issues, lounge access, baggage allowance, exchange, refund, ticketing, CRS and other issues with results considered by ACCC adopted via democracy rulings. This will , or at least should ,alleviate current consumer communication issues that exist now.

RESPECT THE CONSUMER: ACCC should mandate that both QF and EK should not give 24 hours' notice to the travel agency community on airfare increases-*that they both agree to under closed doors or maybe it is a consistent coincidence !?s-* as that same travel agency is then tagged as the official messenger of bad news to the public. Transparency should be guaranteed by both carriers to have their marketing departments -not just the Travel agency-to advise clients of airfare increases and take the heat off of the travel agency , who many times have to defend or validate what QF and EK have advice , absorbing the consumers dislike and complaints and adding huge Ticketing time Limits upon both the consumer and the agent to reach otherwise new fare levels will apply. Strong advice to both QF and EK should be given to adopt this method of communication, with both QF and EK being very good at marketing the good news direct but both are bad at relaying the bad news of increases to the public , the result being that travel agents wear the costs, the comments and the disappointments from clients.

MUTUAL RECOGNITION OF PRODUCTS: Against consumer requirements and advertised commentary, QF and EK lack clarity and certainty are not training staff or travel agents into the cross-referencing benefits of joint QF/EK acceptance of their Lounge access benefits, extra baggage allowances, status points, Frequent flyer benefits and ability to upgrade fares/flights as they should. Most employees of QF, especially EK staff overseas , are unaware or do not care or are untrained in providing the same or similar benefits of each other's products . This causes the travel agent to intervene, attempt to quell the complaint, reach out to either QF or EK to clarify or rectify-with no quick or efficient results as our lines of communication are blurred. Both EK and QF should work harmoniously, word all marketing documents with the same consumer facts within all collateral and websites. and retrain staff. Any professional alliance should be doing this to reduce the pressures on the airline and the travel agency community. *We-as an Agency*-have experienced embarrassing factual reports of no lounge entry , no extra luggage allowances, no respect for Platinum or Chairmans Lounge clients or no leniencies usually extended to such valuable clients due to lack of QF/EK staff knowledge. Stronger operational rules and product knowledge needs to be adopted within both EK and QF websites stating the same facts and advantages for **consumers ,because at the moment they ae confusing and lack what each QF/EK promise to deliver to consumers.**

PRICING OR PRICE CONTROLS : Having a monopoly to EUROPEAN markets with QF and EK would continue with more Airlines not able to compete fairly and travel agents would again be sidelined as both EK and QF gives travel agents no revenue streams, yet expects agents to sell their airline products, attend webinars,, train staff at agencies expense, receive ADMs (Agency Debit Memos) and be subservient to their desires and flight cancellations/suspensions/amendments 24 x 7. Other Airlines tend to be more reasonable and assist Agents with dedicated Telephone numbers, Sales reps, websites and less monopolizations. Any extension of the QF/EK relationship should be underpinned with a realization that the most potent conduit between a traveller and an Airline is the travel agent, as reported before and during COVID by the Australian Bureau of statistics and Tourism bodies. Anything less is an insult to the travel agency community and is a disservice to the consumer.

IMPROVE SERVICES FOR CONSUMERS WITH KPI:: It is now historically proven and remains the fact that outsourcing Phone systems by QF has not worked , complemented with their flimsy consumer aimed website that enjoys "crashing" when they release bold statements of new red-e-deals . Examples are already in the public arena of Phone call delays of up to 14 hours on the phone, accidental or deliberate call "fallouts" when discussing hard issues that QF staff , incorrect advice , ;lack of product knowledge and many other issues remain an issue that ACCC should mandate they fix. Travel agents have saved QF and EK much in monies, time, stresses and legally challengeable issues by being the conduit to listen to all consumers, solve problems, reissue tickets, rebook flights and take the pressure off of both QF and EK> Any extended relationship should be benchmarked against a listed KPI set by QF and EK to take the pressures off of consumers with high-level financial fines, payable to the ACCC for non-compliance.

POSITIVE and NEGATIVE MARKETING : QF and EK should support those who support them via simple Phone gold-messaging , such as voice recorded messages and written messages on both websites stating that "*Please refer to your professional travel agent who may charge a professional service or planning fee as required by them to assist you in your current requirements travel on Qantas/Emirates....*" To insult travel agents, *that ACCC and consumers may not know about,* currently dissuades travel agents to assist consumers because they levy a fee against the travel Agent not only via

CRS fees and IATA approved ADM,s but also when the agent telephones QF Connect , with a recorded message on their Agency privy phone line that states something like “.... *We will charge a \$60 fee to assist you in your booking if you continue with this phone call....*” And travel agents pay this to assist a consumer in a non-revenue travel booking to travel on QF. This is unjust, unfair, biased and totally at odds with travel agents being their supposed “travel partner” and logically against the carte-blanche right to agree to any new QF/EK agreement.

MEMORY LOSSES: Without quality travel agents, working 24 x 7 , assisting DFAT, Airlines, Clients, Suppliers and staff worldwide, QF and EK and others would have all been in the High Courts attending litigation-daily. . The COVID and other external incidents have created so many impacts against QF/EK ,that they could not handle . The enormous pressures , phone calls, emails, website applications, were compounded via staff resignations, quality advice disappearing with experienced personnel and we believe QF/EK finically forgot to compensate agents for. In fact , the reverse happened with QF/EK-by sheer coincidence-reducing commissions to ZERO or 1%, They then reduced important staff positions, and invested monies that should have been appropriated into joint QF/EK training programs and travel agents revenue streams into another few business entities -all against the mainstream travel agency community- in the form of “Trip-A-Deal” for QF and “Inspiring Vacations” for EK To insult travel agents more they had the gall to ask the same agents to sell their Air and Land and Cruise products “please”, but not pay Agents any commission or revenue to do so. This memory loss o both QF and EK , forgot how travel agents alleviated pressures, stress and cost blowouts for both carriers before, during and after COVID. Agents could have, but did not, direct all angry consumer emails and phone calls towards QF/EK systems which would have led to mass structural issues, legal battles and human loss of life vias stress levels etc. We know, from personal staff losses experience, that this is not a light subject to confront but we believe consumers have the right to be respected and have a paid service delivered either by an Airline or an Agency based on past factual memories.

UNFAIR PLATFORM WILL BECOME MORE UNFAIR: QF and EK consistently offer special exclusives to travellers of extra Private fares via contracts between a Corporation and QF/EK direct or extra bonus Frequent Flyer points, extra Lounge passes, upgrades and special fares wo just happen to be clients of a travel agency who initially introduced them to the Airline, nurtured them , attends to their needs and is trusted to do so only to have QF and EK restrict such offers or sales only made I consumers were to deal direct with QF and EK .This is not in the consumer interest or adds any value to that consumer, many who are time-poor or rely upon that travel agent to follow through with travel arrangements and not pass thru layers of Airline hassles. Many such offers are supposed to be exclusive or discreet but remain non-revenue sales made by the travel agent but QF and EK forget that the travel agency bond with consumers is usually very strong and special . Additionally QF and EK refuse to advertise many such deals within the travel agency network ,again allowing no knowledge hence restricting consumer access. New rulings need to be in place for QF/EK to advise and also accommodate the right of consumers to either deal directly via QF/EK or via the travel agency network but not solely via segmented QF/EK marketing channels.

CONTROLLING ASPECTS :QF and EK through their introduction of the NDC system (New Distribution Capability) is absolutely biased towards QF/EK financial controlling needs which are useless if an agent wishes to use a comparison of multi airlines as the NDC system bias only QF and EK services and fares but are actually not combinable or in partnership with one another as they work on totally different platforms. This restricts travel agents to offer consumers the best value routes and fares and seating allocations and fare conditions.. To add to QF/EK controlling aspects , both QF and EK have levied increased CRS charges against travel agents who daily rely upon and use via Sabre, Amadeus and Travelport-Galileo Computer Reservation Systems, penalizing Travel Agents via an increase CRS booking sector fee if they dare use anything besides their new NDC platform. In an ideal world the strengthening of any QF/EK partnership should allow more freelancing, less financial impositions and the same leverage of fares, flights, seats, bonuses and offers to all registered travel agents no matter what platform is used , so we can provide same levels of services -without imposing financial costs- against that agency to service consumers better.

COMPETING AGAINST THEIR OWN KIND : The travel industry is unique to have main suppliers deal direct with consumers, demanding travel agents to sell fares, explain conditions, assist travellers and decipher complex conditions and rules and offer 24 x 7 services o behalf of QF/EK without any source of revenue but importantly without positive marketing messages and advice given to consumers that dealing with a professional travel agent has its worth. The current scenarios of the QF/EK partnership has seen a lack of on-the-ground sales support, quality face-to-face training, product updates, educational and other import support aspects from QF/EK towards the travel agents, with the non-revenue platforms that they expect agents to work with. In the same breath, they request agents to market, support, sell and rectify QF/EK issues for non-revenue. Then they market to travel agents that they are the “*partners of travel agents*”. To compete

against your partner is not a partnership-it is a competition. In Competition there are winners and losers. Currently consumers are the losers for aspects detailed herein, many still unknown to them and many Government departments.

UNFAIR TACTICS. LACK OF ACCOUNTABILITY: Travel Agents receive an ADM (Agency Debit Memo) if they make an error in quoting or issuing QF/EK tickets but a travel agency cannot counter this by issuing an ADM against an Airline like QF/EK who make errors in flights or fares, missed connections, incorrect advice, lost baggage, cancelled flights, amended flights, offloading of clients etc. This is out of balance with commercial reality.

- Travel Agents assume and accept legal responsibility for what they do daily and QF and EK should do the same.

The innate ability, speed, efficiencies and effective services in place today allows agents to explain, assist, direct, amend, exchange and refund travel components of most other Airlines, Cruise, Hotels, Tours etc , evidenced during COVID ,so QF/EK should extend this specific toolkit of services to allow professional travel agents to extend their expertise, experience and time-saving tools to assist consumers to receive faster answers and monies rather than rely on the cumbersome and antiquated systems of QF and EK, and properly compensating financially the travel agents for the work they have done. This will absolutely streamline faster results to consumers and thereby saving QF/EK additional staff levels, time, layers of administration and stresses. Many Cruise companies and Tour operators already do this. Using the existing professional infrastructure of trained professional travel agents will reduce consumer costs overall , reduce Consumer affairs complaints, resolve legal ramifications and add to better efficiencies within QF/EK structures.

MARKETING versus REALITY: The huge amounts of marketing dollars spent by both QF and EK and the well crafted Media releases by QF/EK Management teams should not cloud what happens in reality for consumers to contend with and what travel agents have to deal with. Both are separate in truthful fact. If QF/EK want a strong relationship that works harmoniously with accredited Travel Agents, then they should work with them and not against them in providing quality contact sources, efficient resolution of consumer requirements, a logical system of remuneration, more honest communications with agents, with better support towards consumers to allow them to use the services of travel agents to apply for exchanges, refunds, credits, frequent flyer bookings . They should then be instructed to regularly advise consumers that their “travel partner” of a travel agent/advisor is there to assist and advise and book and issue travel , some applying a deserved professional fee . Currently many staff of both QF and EK hide by busing the word “Privacy laws” but that is totally obliterated and false in many cases as QF/EK tend to state this to protect their own interests and their staff and management team need to attend Privacy Law lessons . The majority of consumers have already entrusted travel agents with their written legal authority to file and use their passport , Credit Card details, frequent flyer numbers, pin numbers etc for legitimate request travel bookings. Although QF/EK has a portal to allow travel agents to represent clients, this must be better advertised by QF/EK working alongside-not against- travel agents to allow travel agents to attend to the travel bookings faster than any QF/EK layer could do, with a professional agent fee added. Consumer assistance and resolution of QF/EK issues would be faster, more efficient, less prone to cyber-attacks and more personal.

SUMMATION : A QF/EK alliance can be good, but certainly must be reconfigured to be much better , needing serious consideration by ACCC as well as Consumer Affairs departments in how to improve consumer confidence in a currently substandard relationship that is biased towards the commercial interests of QF and EK. The current relationship lacks solid substance, travel industry and consumer honesty and is thin on the actual factual benefits of most consumers . Any QF/EL partnership or alliance should engage closely the experience, expertise and professional services of a quality professional travel agent.

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