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Office of Aviation Consumer Protection  
U.S. Department of Transportation  
1200 New Jersey Avenue, SE  
Washington, DC 20590

**Re: Family Seating in Air Transportation; Docket DOT-OST-2024-0091; Comment ID DOT-OST-2024-0091-0258**

Dear Ms. Johnson, Ms. Smith, and Ms. Workie:

The Travel Technology Association (Travel Tech) represents the leading innovators in travel technology that facilitate millions of bookings annually. Our members are deeply committed to ensuring an efficient and seamless booking experience for travelers, including families.

We appreciate the opportunity to provide additional context and clarify existing practices in response to comments submitted by Airlines for America (A4A) regarding the Department of Transportation's (DOT) Family Seating Notice of Proposed Rulemaking (NPRM). As detailed below, ticket agents already perform essential roles in collecting and transmitting passenger information and existing industry processes are designed to meet these needs effectively.

**Established Processes for Passenger Information**

A4A obtusely proposes that DOT mandate ticket agents collect and transmit passenger information to support the proposed family seating requirements, stating:

*“To achieve Congress’s and the Department’s stated goal of ensuring adjacent seating, it should also impose obligations on large ticket agents to collect and transmit passenger age information.” (p. 38)*

A4A further recommends that DOT amend regulatory language to formalize this obligation:

*“Large ticket agents shall provide the assigned seating carrier with passenger age and booking party contact information.” (p. 40)*

Ticket agents already collect and transmit passenger information. Ticket Agents provide age details by providing the passengers’ date of birth. Without this information, a ticket cannot be issued. This information is transmitted to airlines in real time through the Passenger Name Record (PNR) system, ensuring compliance with federal mandates such as:

- **TSA Secure Flight Program:** Airlines are required to submit passenger data, including name, date of birth, and gender, to TSA for pre-flight screening under [49 CFR Part 1560](#). This ensures passenger details are available at least 72 hours before departure.

- **CBP Advance Passenger Information System (APIS):** For international flights, airlines transmit passenger information to CBP as required under [19 CFR Part 122](#), Subpart H.

Further, under [IATA Resolution 830d](#), ticket agents must actively ask passengers, at or before the time of ticketing, whether they wish to provide their contact details (e.g., mobile number and/or email address) to airlines participating in their itinerary. These contact details enable airlines to proactively notify passengers about operational disruptions, such as flight cancellations or schedule changes.

Agents must ensure that the passenger's consent is obtained in compliance with applicable data protection regulations. When passengers agree, ticket agents input this information into the Passenger Name Record (PNR) in accordance with IATA reservations procedures. In cases where passengers decline, agents must document the refusal in the PNR and inform the passengers that they may not receive airline notifications regarding operational disruptions. These requirements ensure that airlines have the necessary contact information when passengers consent to share it, making additional regulatory obligations redundant.

### **Addressing A4A's "Large Ticket Agent" Distinction**

A4A's use of the term "large ticket agents" also warrants clarification. Ticket agents, regardless of size, adhere to standardized data-sharing protocols for transmitting passenger information. These mechanisms remain consistent across the industry, and distinctions based on revenue have no impact on the processes used to collect and transmit passenger data.

### **Operational Considerations and Responsibilities**

A4A raises concerns about operational challenges in meeting DOT's proposed timing requirements for adjacent seating assignments, suggesting that airlines may not have full control over compliance due to third-party sellers:

*"Many airlines, ticket agents, and other distribution systems are not designed to rapidly transmit the passenger age information that would allow the airline to conduct the seating assignment within the proposed time." (p. 37)*

We respectfully submit that ticket agents fulfill their data-sharing responsibilities at the time of booking. As addressed above, passenger information, including age details such as date of birth, is collected and transmitted to airlines in real time through the PNR system. The PNR, which is required to complete a booking, includes key information such as passenger names, Secure Flight data, and group booking identifiers. This ensures that airlines receive the necessary details to manage seating assignments.

The allocation of seats, however, is entirely within the airlines' operational control. Airlines utilize their proprietary systems to manage seat inventory, implement seating preferences, and assign seats. Ticket agents are not involved in these processes and do not have access to the tools needed to influence seat assignment. A clear delineation of roles – ticket agents as data providers

and airlines as seat allocators – will help ensure that the final rule reflects the operational realities of air travel.

### **Conclusion**

We appreciate the Department's thoughtful approach to enhancing the travel experience for families through the NPRM. Travel Tech and its members are committed to supporting initiatives that facilitate family seating while maintaining clear and consistent roles for all stakeholders. The existing processes effectively provide airlines with the necessary passenger information to accommodate family seating requests.

We welcome the opportunity to collaborate with the Department and industry partners to address any remaining concerns and to ensure that the final rule reflects the practical realities of airline and ticket agent operations.

Respectfully submitted,



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