



What's Good For Business.

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September 24, 2021

Mr. Todd Homan, Director
Office of Aviation Analysis
Federal Aviation Administration
1200 New Jersey Avenue, S.E.
Washington, DC 20590

**Re: Docket # DOT-OST-2021-0103
Reassignment of Schedules at Newark-Liberty International Airport**

On behalf of our 900 member companies, the Commerce and Industry Association of New Jersey (CIANJ) herein submits comments regarding the United States Department of Transportation's (Department) recent notice entitled "Reassignment of Schedules at Newark-Liberty International Airport". CIANJ appreciates the Department's efforts to ensure a competitive balance at Newark Liberty International Airport, however, we also want to ensure that these efforts to increase access do not negatively impact the overall customer experience by exacerbating Newark's known congestion and delay challenges.

The CIANJ proudly serves the interests of our member companies from virtually every business sector since 1927. We are strong advocates for a free-market economy where innovation and entrepreneurship are encouraged and supported. Part of a successful and vibrant economy between sectors is the ability to conduct business on a personal level which more often than not requires business travel. As you are aware, the pandemic has changed the dynamic on how business is conducted but an integral part of our economic recovery is the return of business travel. With that in mind, we must remain vigilant and cognitive of how business travel occurs, and we must make it as efficient and affordable as we can in order to optimize our economic success.

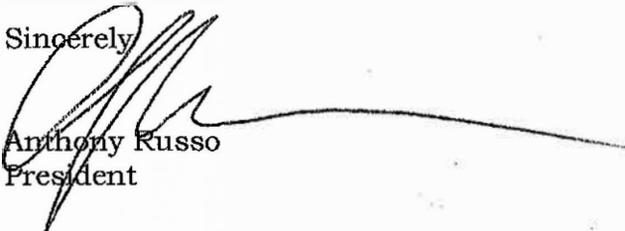
Congestion and delays significantly impact business travelers' plans, and ensuring customers can safely, efficiently and reliably travel is a critical consumer and business protection issue. Delays and cancellations cause disruptions to customers' itineraries that have the potential to cost hundreds or thousands of dollars – or will mean the difference between traveling to meetings, milestones and family events. The Federal Aviation Administration (FAA) estimates that air travel delays nationwide cost passengers some \$33 billion in lost time and productivity in 2019, and Newark Airport is consistently among the most negatively impacted airports in the country. Newark Airport has historically been the nation's worst-performing airport for schedule reliability in recent years, and we want the Department to provide assurances that adding more flights at Newark will not create additional gridlock or worsen the airport's poor performance record, particularly during peak hours, when disruptions can have a cascading effect.

We must also highlight the importance the travel industry plays to our State's economic success. United Airlines' hub operations at Newark Airport drives nearly \$9 billion in GDP each year in New Jersey and supports more than 80,000 direct and indirect. Most United Airlines Newark employees are unionized, with stable jobs offering a quality of life and wage growth that's higher than the private sector average. And the broad network of destinations United Airlines serves from Newark, including both unique international cities and many small and medium-sized U.S. communities, offers the New York/New Jersey region a level of connectivity that can only be supported by United Airlines hub-and-spoke business model. As our economy recovers from the effects caused by the COVID-19 pandemic, the type of benefits offered by United Airlines Newark hub are an important part of the effort to build back better and must be protected and enhanced

Unfortunately, the footprint of Newark Airport's location is already at capacity, and its constrained capacity cannot be increased by adding more runways. There is simply nowhere to put one. This means the solution to the delays that plague Newark Airport can only come through congestion mitigation measures. Given the stakes involved in getting this right, we urge the Department to remain focused on Newark's on-time performance and not to allow its decision to reallocate the former Southwest capacity to jeopardize the airport's vital role in the economic recovery of the New York/New Jersey region and of the nation.

Thank you for the consideration and we look forward to your response.

Sincerely



Anthony Russo
President