



TURBULENCE AHEAD:

How User Fees Could Ground the FAA

*Will Changing The Way
the Federal Aviation Administration
is Financed Improve it?*

An Assessment of The Proposed Change to User Fees
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EXECUTIVE SUMMARY

In 2006, Congress will begin debating the next authorization bill for the Federal Aviation Administration. The airline industry, general aviation and other stakeholders are already debating proposals to overhaul the tax system that generates revenue for FAA operations and capital investments.

One significant proposal, still largely flying under the political radar, would replace the existing tax system with “user fees.” This effort is being driven by the major network airlines, who want discount airlines and general aviation – primarily owners and operators of business aircraft – to pay their “fair share” (i.e., a larger share) for federal aviation services. The FAA is at least tacitly in favor of such a change.

In FY 2004, the existing tax system generated \$9.7 billion in revenue for the FAA¹. Of that amount, almost three-quarters came from two sources: a 7.5 percent excise tax on each passenger ticket, and a fee (currently \$3.20) for each domestic “flight segment” flown². User fees are based on such things as the size/weight of an aircraft and the distance flown on a given flight, possibly with an added “congestion tax” for service to overloaded airports at peak times.

This paper examines user fees primarily from a policy perspective, and also considers the likely consequences – anticipated or otherwise – of changing to such a system. ***Following are its primary conclusions.***

1. Replacing the existing tax system with user fees could be a financial disaster for U.S. airlines. The reason is that when revenue from user fees decreases for any reason (typically, a soft economy), airlines and other stakeholders will have to make up the shortfall. The result will be an increase in operating expenses when airlines are least able to afford it, and such scenarios have already occurred in Canada and Germany.
2. Airlines in financial difficulty could avoid paying millions of dollars in user fees by filing for Chapter 11 bankruptcy protection. The resulting shortfall would have to be made up by other users. In view of the fact that more than half of the major U.S. air carriers are currently operating under bankruptcy protection, this is a very important consideration. (In contrast, a bankruptcy filing does not excuse payment of excise taxes.)
3. There is no evidence to justify radical changes in the aviation tax and fee system. Every available industry indicator relating to the FAA – including passenger volume, and yield – are on the rise. FAA Administrator Marion Blakey told Congress in May 2005 that “overall passenger demand and commercial activity at FAA air traffic facilities will return to pre-9/11 traffic levels by the end of the year.”³

1. U.S. House of Representatives, Subcommittee on Aviation, “Hearing on Financial Condition Of The Aviation Trust Fund: Are Reforms Needed?” May 4, 2005. <http://www.house.gov/transportation/aviation/05-04-05/05-04-05memo.html>

2. See Appendix A, “Aviation Trust Fund, Estimated Tax Revenues, By Source.”

4. Currently, collection of the existing excise taxes and segment fees is virtually automatic, with the funds remitted directly to the Treasury. In contrast, a user fee system would require the FAA to assess and collect fees from thousands of users, and to track down deadbeats – tasks for which it has no qualifications or experience. A new bureaucracy would be required to operate a fee system, incurring administrative costs that would consume a portion of any revenue increase.
5. Questions about whether the FAA needs more revenue and whether user fees should be adopted are two entirely different topics. Adopting user fees will not necessarily increase revenue, and increasing revenue does not require user fees.
6. Although large network airlines might gain a brief competitive advantage from user fees by shifting costs to other stakeholders, in the long-run they will have opened a Pandora's Box. Once a precedent is established for user fees, it is much easier for Congress to impose many more. Potential examples include congestion taxes for flights between busier airports; fees for health and safety inspections; surcharges for various categories of air traffic control; fees to help fund new equipment or training; fees for navigation systems or weather forecasting – the possibilities are endless.
7. User fees are also a step in the direction of supporting an agenda: to privatize or commercialize some FAA operations, including air traffic control, for reasons of ideology as much as economics.
8. Today's economic climate is allowing airlines to raise fares, which means – especially when passengers are flying – that revenue from the existing ticket tax will increase. During the last twelve calendar months, there more than 30 attempts by airlines to raise fares, and at least 17 were "successful." In fact, the airlines' biggest current problem is the high cost of aviation fuel.
9. When it comes to funding federal aviation services, fairness is in the eye of the beholder. There is no single "correct" formula, and – like most arguments about money – the winners will be determined by politics, economics, luck, the ebb and flow of the airline business, and vigorous combat between stakeholders. This process is normal – but again is not necessarily related to whether taxes or fees are the "best" way of raising revenue.

3. "Statement of Marion C. Blakey, Administrator of the Federal Aviation Administration," before the Aviation Subcommittee of the Committee on Transportation and Infrastructure, U.S. House of Representatives, on the Financial Condition of the Airport and Airway Trust Fund, May 4, 2005. www.faa.gov/news/testimony/testimony/2005/testimony_050504.htm

10. One thing all those who are publicly supporting user fees have in common is the mistaken belief that fares are going down. This is the mantra of the user fee argument. This argument is categorically wrong. (See Appendix B & C). Prices have been rising over the last year and with the increases in the price of jet fuel, there is pressure on all sides, including the low cost carriers to raise prices further.
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INTRODUCTION

America's network airlines are awash in red ink and one of their most popular destinations is bankruptcy court, while the Federal Aviation Administration claims to be rapidly running out of money. When those trends are combined with the start of congressional debate in 2006 – which also happens to be an election year – on reauthorization of FAA funding, the result is likely to be a perfect storm, whirling the participants in many unexpected directions.

As a television reality show, the action and drama could be quite entertaining. But in the real world, this is serious business – about the future of the nation's aviation infrastructure and the funding for the federal agency whose mission is to ensure safe, efficient air travel. And the setting is all too familiar – overcrowded airports, not enough runways, and too many delayed or canceled passenger flights and freight shipments. There is a widespread belief that the entire aviation system is perilously close to meltdown, resulting in serious harm to America's efficiency and competitiveness.

The purpose of this report is to examine what appears, at first blush, to be a related question that only an accountant could love: Should the FAA continue to be largely funded by federal excise taxes on airline tickets and other aviation-related activities, or should that tax revenue be replaced by user fees?

In theory, it's a "fairness" issue. Advocates argue that users of government aviation-related services should more or less pay directly for them. But in Washington, when somebody talks about fairness, it's usually about the money, and user fees are no exception. Various players in the airline industry – primarily the big money-losing network airlines – hope to make changes that will benefit them, harm their competitors, or tap other people's wallets to help pay the cost of the FAA.

The most recent major discussion of aviation user fees was almost a decade ago, when Congress was debating the last FAA reauthorization bill in 1997. But the fees failed to materialize largely because of opposition from discount airlines, general aviation groups, and at the end, a lack of agreement among those who were advocating it.

Since then, the idea has been flying under the radar. But, supported by some heavy hitters and in tune with the pro-privatization orientation of the White House, it's coming back.

"The political winds appear to be blowing in favor of user fees – with airlines, Congress, Wall Street, the Federal Aviation Administration and U.S. Chamber of Commerce exploring the benefits of this funding mechanism," *Airline Business* magazine reported in the spring of 2005. "User fees will likely be challenged by general aviation and business aviation groups, depending on how the charges are structured. But the key power centers appear to be sympathetic to user fees, primarily because of a belief the FAA is facing a multibillion dollar deficit and that airport congestion will be a major problem as a result."⁴

This report will examine whether user fees represent a ray of hope for the airline industry and its customers – or have the potential to create America's next great aviation disaster.

4. *AIRLINE BUSINESS REPORT*, May 23, 2005, "Airline User Fees Slated For Air Traffic Control"

CURRENT AVIATION TAXES – HOW THEY WORK

The Federal Aviation Trust Fund (officially the Airport and Airway Trust Fund or AATF), provided over \$11 billion for the FAA in FY 2005, 80 percent of its total spending of \$13.8 billion, with the remaining amount provided by the general fund of the Treasury.

Today, the fund's revenue comes from a variety of sources: ⁵

- a 7.5 percent tax on the price of each domestic passenger ticket
- a domestic "flight segment" fee of \$3.20 per segment for each passenger
- an international departure/arrival tax of \$14.10 per international passenger
- a 6.2 percent waybill tax on domestic cargo and mail
- a tax of 21.8 cents per gallon on jet fuel used for general aviation
- a tax of 19.3 cents per gallon on gasoline used for general aviation
- a commercial fuel tax of 4.3 cents per gallon

The segment fees and international departure/arrival taxes are indexed to the Consumer Price Increase and typically increase each year, but the airline ticket tax is a fixed percentage of the price. It accounts for about half the trust fund's revenue each year. ⁶

5. U.S. Department of Transportation, Bureau of Transportation Statistics, "Government Transportation Financial Statistics 2001 -- Discussion of Trust Funds." www.bts.gov/publications/government_transportation_financial_statistics/2001/discussion.html

6. See Appendix A "Aviation Trust Fund, Estimated Tax Revenues, By Source."

USER FEES – THE WHAT AND THE WHY

One nice thing about a user fee is that its definition is in the eye of the beholder. But a working definition in our specific instance could be “a fee charged by the federal government to specific recipients of aviation-related benefits (including goods, facilities, services and “permissions”), with a reasonably direct relationship between the true cost of the benefit and the amount of the fee.”

Beyond that broad outline, there is an disturbing lack of specifics about user fees – how their levels would be set, who would be required to pay them, and how they would be collected. But most advocates favor user fees on individual flights to be based on an aircraft’s size and/or weight and distance flown, possibly supplemented by a “congestion charge” for arriving or departing from busy airports at peak times.

The major advocates of replacing excise taxes with user fees are the large network airlines supported by various business-related organizations who seek improved funding for aviation infrastructure.

The major opponents of such a change are discount airlines and owners of business aircraft. They argue that the big airlines don’t particularly care whether they are paying a tax or a fee. Their primary goal is to make the other guy pay a larger share of Uncle Sam’s bill.

Following is a sampling of the pros and cons, viewed from my own perspective as a veteran observer of the aviation wars:

The Case Against Excise Taxes

1. The existing tax system is broken – and needs to be fixed. The nation’s aviation system is at risk, and the once-healthy aviation trust fund is close to running dry.
 2. Excise taxes are unfair. Usually, a ticket for a flight between Point A and Point B costs more on a network airline than on a discounter. Because the tax is a percentage of the ticket price, the tax on the same route is higher for the network airline than for the discounter – even though there is no difference in the benefit for the “user.” That’s not fair.
 3. Passengers regard excise taxes as part of the ticket price, not something that is “added on” (like a sales tax, for example). Passengers also shop for tickets by comparing the total cost, including the tax. Since the tax is “higher” for the network airline (per the previous argument), there are two negative results:
 - The higher tax on the network airline ticket increases the price of its ticket compared to the discounter – for no valid reason.
 - If, for competitive reasons, the airlines absorb the cost of excise taxes instead of trying to pass them on to passengers, the network carriers are hurt more than the discounters – again because the tax is larger.
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4. Government services, including air traffic control, cost about the same for any given route whether the name on the plane is American or jetBlue. So why should the government's fee, (i.e., the amount of the excise tax), be different?
5. Replacing a tax on passenger tickets with a user fee would give those users, the airlines, more influence over federal aviation policy, helping to promote sound policies and hold down wasteful spending.
6. User fees would bring in revenue from other aviation users – especially, the for-profit operators of business airplanes – who currently don't pay the excise tax because they don't sell tickets. There would be no more "free ride."
7. From the big-picture perspective, user fees would increase the amount of sorely needed revenue to improve aviation's infrastructure, including airports and the flight control system.
8. Most of the big airlines are either in bankruptcy court, headed that way, or trying to recover from the experience. Unless they get a break, they'll disappear.

Not surprisingly, discount airlines and business aircraft owners take the opposite view.

The Case Against User Fees

1. The existing system is not broken – so fixing it is unnecessary and risky. There are always unforeseen consequences when Congress decides to make wholesale changes in the operation of a federal agency (the most recent example being the Department of Homeland Security).
 2. The excise tax is applied the same way as many everyday taxes, including sales taxes – the higher the price of an item, the higher the tax. There's nothing unusual or unfair about it.
 3. The opposition to excise taxes is mostly sour grapes by the big airlines. It's not the fault of other aviation users that many airlines are losing billions of dollars.
 4. There is no reason why excise taxes (or user fees, for that matter) should be required to fund all the operating costs of the FAA. Providing a safe, efficient aviation system is a core function of government, and it is appropriate that general revenue should cover some of the cost.
 5. General aviation users already contribute to the aviation trust fund through taxes on aviation fuel. And the most expensive part of the FAA's operations – including airline safety and air traffic control – was built to serve commercial aviation, not private pilots. If general aviation disappeared tomorrow, the FAA's costs would not drop substantially.
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6. Questions about whether the FAA needs more revenue and whether user fees should be adopted are *two independent topics*. Adopting user fees does not automatically raise revenue, and increasing revenue does not necessarily require user fees.
7. Giving airlines more influence through payment of user fees is a terrible idea. Airlines can't manage their own business, so do we really want them managing the air traffic system? Additionally, airlines are primarily interested in helping themselves and hurting their competitors – not in promoting the overall health of the aviation system.
8. Discount airlines contribute less to airport congestion, because they mostly use secondary airports that have less traffic. If Southwest is serving Chicago through Midway, why should it have to pay a congestion tax because O'Hare's airspace, runways and concourses are overcrowded? Besides, airlines already charge their own congestion tax – by making available fewer discount tickets on flights at peak times to peak destinations. Why should passengers have to pay for congestion twice?

User Fees: The What and the Why

The legacy airlines believe a system of user fees would benefit them in two ways:

1. Reducing the amount they pay to the federal government. This would let them keep prices the same and increase their revenues at no increased cost.
2. Improving their competitive prospects by having their low-fare competitors pay more to the government. That would prompt the discount carriers to raise their ticket prices – or at least to stop lowering them.

Ken Button, an economics professor at George Mason University, discussed aviation taxes and user fees in a paper published earlier in 2005. He supports user fees from different perspectives, including government responsiveness and efficiency.

“A genuine user fee ... relates the cost of an activity to the fees that are collected, *irrespective of who does the collection*” (emphasis added). The existing system of taxing American aviation fails most of the criteria applying to an appropriate user fee, namely: influence the user in such a way the facility is used efficiently, providing guidance as to where capacity changes are needed, and generate revenue to finance additional capacity.”⁷

7. “Taxing the US Airline Industry – A Time for Change,” 2005. www.aerlines.nl

Button says a tax should be evaluated from three perspectives:

- **ADMINISTRATIVE ISSUES.** Government agencies and elected officials prefer taxes that are easy and cheap to collect, and likely to trigger only limited opposition from taxpayers. Button says existing aviation excise taxes meet both those criteria, since airlines do the work of collecting the tax while having little ability to influence how it is used or get voters worked up about the topic. But on the minus side, Button concludes that taxing airlines creates administrative problems because the industry is unstable and cannot ensure a consistent revenue stream.
- **EFFICIENCY.** This relates to the implications of a tax and its intended benefits from the perspective of those who actually bear the tax burden. Efficiency is best achieved when the tax system is simple and its implications to different groups are transparent. When it comes to the airline industry, of course, excise taxes fail to pass that litmus test, since neither passengers nor airlines have much influence over how the revenue is spent.
- **FAIRNESS AND SOCIAL ISSUES.** In the United States, tax policies are often employed (with mixed results) as agents of social change – to reward certain types of “good” behavior, or to discourage “negative” behavior. Button believes that such equity considerations should affect taxes or fees – but concedes that within the aviation community, notions of equity are entirely subjective. I would approach this topic by asking a question: How can you create a tax/fee policy intended to produce positive change, when the key stakeholders (in this case, members of the aviation community) are waging negative campaigns against one another?

In point of fact, there is no such thing as a totally fair user fee or totally fair tax, for that matter. The theory of such fees is appealing – you add up the total costs, and apportion them on the basis of usage. However, policy decisions are seldom based on much simplistic assumptions. If instead, we were to perform a cost benefit analysis and base the fees on this outcome, the fees would be based on the benefits received. It is doubtful that this would result in anything other than the legacy airlines receive the most benefit and should pay the largest fees as they generate the most stress on the system and receive the most benefits.

EXCISE TAX REVENUE STREAMS

There has been much recent comment about the state of the aviation trust fund. Marion Blakey, the FAA administrator, testified before Congress in May, 2005, that the trust fund had dwindled from \$7.3 billion to \$2.4 billion from FY 2001 to FY 2004, to compensate for tax revenue that was lower than expected.

“The FAA’s future funding requirements will significantly outpace revenue from aviation taxes,” Blakey warned. “The FAA needs a stable source of funding that is based both on our costs and the services we provide ...”⁸

Her implications were clear: The FAA is going broke, and we need to change the tax system to fix the problem. While it is true that the FAA Trust fund suffered after 9/11 due to many factors, we see revenues beginning to return.

It is true that the 9/11 tragedy was also an economic disaster for the nation’s airlines. Domestic passenger volume as measured by enplanements fell by 7 percent in 2001 and an additional 2 percent in 2002.⁹

But passengers did return to the skies, with enplanements rising 6 percent in 2003 and 7 percent (estimated) in 2004.¹⁰ Even Blakey conceded in her May, 2005, testimony to Congress that “overall passenger demand and commercial activity at FAA air traffic facilities will return to pre-9/11 traffic levels by the end of the year ... commercial operations at 17 of this country’s top 35 airports have already exceeded their pre-9/11 levels.”¹¹

In fact, airline passenger traffic has shown remarkably consistent growth. In the 60 years since the end of World War II, enplanements have increased 51 times and dropped only nine times. And only twice have enplanements ever decreased for two consecutive years – in 1980-81 (after OPEC cranked up the price of oil to more than \$30 a barrel) and 2001-2002.¹²

Congress

It also should be emphasized that Congress has been more than generous to the FAA. Few federal agencies have had more money pushed at them. From FY 1996 through FY 2005, the FAA’s operations budget increased from \$4.6 billion to \$7.7 billion.

Usually, what the FAA wants, the FAA gets. For example, Congress funded the FAA’s FY 2005 operations request at 98 percent of its requested level, and that percentage of funding has been fairly constant since the trust fund was created in 1970.

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8. “Statement of Marion C. Blakey, Administrator of the Federal Aviation Administration,” before the Aviation Subcommittee of the Committee on Transportation and Infrastructure, U.S. House of Representatives, on the Financial Condition of the Airport and Airway Trust Fund, May 4, 2005. www.faa.gov/news/testimony/testimony/2005/testimony_050504.htm
 9. An enplanement is a paying passenger boarding an aircraft. A typical round-trip journey through a hub (for example, flights from Denver to and from Miami, connecting in Atlanta) counts as four enplanements. As a practice it is very difficult to separate enplanements from the number of passengers. See Appendix D, System Enplanements
 10. See Appendix E, “Annual Operations, Traffic and Capacity: U.S. Airlines, Scheduled Services,” Air Transport Association
 11. “Statement of Marion C. Blakey, Administrator of the Federal Aviation Administration,” before the Aviation Subcommittee of the Committee on Transportation and Infrastructure, U.S. House of Representatives, on the Financial Condition of the Airport and Airway Trust Fund, May 4, 2005. www.faa.gov/news/testimony/testimony/2005/testimony_050504.htm
 12. See Appendix E, “Annual Operations, Traffic and Capacity: U.S. Airlines, Scheduled Services,” Air Transport Association

Actually, the Bush Administration did try to pull back on the FAA budget for FY 2006. The Administration request would have severely reduced the Airport Improvement Program (AIP) and the Facilities and Equipment budget (F&E) while increasing the Operations budget. The Bush Administration also wanted to cut the FAA's capital and grant programs to support its stated goal of reducing the federal budget deficit by one-half by 2009.

Congress, however, has restored these proposed budget cuts.

A lack of money has not been the central problem of the FAA. Congress has been a strong supporter of the agency's funding needs and has provided a stable financial platform in both good and bad times. The root causes of the FAA's problems go much deeper, and there is nothing to suggest that simply throwing more money at the agency will solve anything.

The State of the Airlines – Revenue and Red Ink

There is no argument that most of the U.S. network airlines are bleeding red ink. From an economics perspective, some observers describe this as a "structural break" – a long-term change in the entire ticket pricing scheme, with intense competition resulting in carriers being unable to raise prices. Therefore, the argument goes, in this new era of cheap seats, the old-school excise tax on low-price tickets will never be an adequate source of revenue.

The big carriers are still losing money, but their biggest problem right now is the rising price of jet fuel.

There also is simply no truth to the notion that fares are permanently depressed. All of the airlines are raising fares right now, and there is incredible pressure to raise fares further.

The ability (or inability) of airlines to increase ticket prices is very significant. Typically, when one airline raises fares, its competitors can either do the same or hold the line. When an airline's move to raise fares is followed by competitors, the effort "succeeds." When competitors don't follow, the airline usually has to roll back its increase (to stay competitive), and the effort "fails." So the "success" or "failure" of attempts to raise ticket prices is a useful window on airline economics.

In 2000, there were 15 attempts to raise ticket prices, and every one of them succeeded, bringing fares to an all-time high. True, prices dropped from 2001 to 2003, but they have been rising ever since. During the last twelve calendar months, there were at least 31 attempts to raise fares. Seventeen of those attempts were successful, a record for one year.¹⁶

When the economy improves, so do passenger loads. When the economy goes down, fewer people travel and it becomes very difficult for airlines to increase prices. None of the fundamental laws of economics changed because of 9/11. Today's economic and competitive climate is allowing airlines to raise ticket prices. If fares continue to rise, and operating costs (including the price of jet fuel) remain stable or decline, eventually the airlines will return to profitability. The ability of airlines to raise fares is always partially a function of the economic health of the country.

13. See Appendix B, "Fare Increases Since 2000"

One thing about commercial aviation is absolutely certain: People want to travel. It is true that a soft economy, fear of terrorism or other negative events will reduce the number of those passengers for varying periods of time, but there is a nearly universal desire to visit far-flung families and friends, to explore different parts of our country, and to discover the world. If we have money in our pocket, we will travel. And if we can afford to, we will fly.

THIS WASN'T IN THE FORECAST

As the previous section illustrated, two positive trends for the airlines have already begun, and there is every reason to believe they will continue:

- The number of airline passengers has risen.
- The price of airline tickets has risen.

Since those are the only factors affecting tax revenue from ticket sales, that means more money will start flowing into the aviation tax fund.

In the medium to long term, the airlines should return to profitability. But today, more than half the nation's major airlines are operating under Chapter 11 bankruptcy protection.¹⁴

And, as a *Washington Post* writer put it: "Ducking your debts is what Chapter 11 is all about."¹⁵ Companies in bankruptcy proceedings can stiff their vendors. They can cancel contracts, including those with unions. They can renege on pensions. They can even delete everybody's frequent flier miles. But they still have to make tax payments to Uncle Sam, who gets paid before anybody else.

So what could happen if the excise tax was converted to a system of user fees? Even if bankrupt airlines owed millions of dollars in user fees, they might be able to avoid paying those. Where would that leave the aviation trust fund?

That difference – user fees might be dischargeable in bankruptcy proceedings, while taxes are not – is one of the most important arguments against changing the system. If the point of the exercise is to produce a more "stable" source of funding for the FAA, user fees represent a huge step in the wrong direction.

Actually, a similar scenario involving user fees has already occurred. In Canada, airports and the NAVCANADA air traffic control system are operated by non-government organizations. When Air Canada filed for bankruptcy in 2003, it owed \$44 million in unpaid fees to NAVCANADA.

In turn, Air Canada's CEO said his company and the entire Canadian airline industry was being harmed by "the fees charged to operate commercial aircraft in the country, including airport fees and air traffic control fees paid to NAVCANADA."¹⁶

14. As the time of writing, the following major airlines: Delta, United, Northwest were all operating under Chapter 11.

15. The Washington Post, "Airlines Hide Out in Bankruptcy Court," Sept. 19, 2005

16. CBC News (Canada) report, Dec. 4, 2003. www.cbc.ca/stories/2003/04/01/milton_030401

TAXES VS. USER FEES – IN GOOD TIMES AND BAD

Predicting the flow of revenue from the existing airline ticket tax is quite simple. When more people fly, or when ticket prices go up, the tax generates more revenue. It doesn't matter how many miles are flown, or whether the airlines are making or losing money.

In theory, tax surpluses that go unspent in good years can be drawn down for lean years – which is how the aviation trust fund “surplus” is supposed to be used.

Another Side of User Fees

Excise taxes and user fees both produce revenue. And they both work best when the economy is healthy, many people are flying, and the airlines are earning money. But there is one important difference – and that difference is extremely important when the outlook turns cloudy.

Let's assume, for example, that the revenue-generating system to fund U.S. aviation services (whether through taxes or fees) is tweaked to produce the desired amount of money in an “average” year for the economy.

In above-average years (more planes in the air, more passengers, and higher ticket prices), either excise taxes or user fees will generate extra revenue.

But let's consider what happens in a bad year – fewer flights, fewer passengers, cheaper tickets.

Under the existing system, tax collections will drop automatically, because the excise tax is directly related to passenger volume and ticket prices. Congress won't be happy because it has to make up the revenue shortfall, but it won't have much choice.

In countries with user fees, they are generally based on the number of flights operated by an airline, and the size/weight of the planes that they fly. When ticket prices fall, or fewer passengers show up, airlines seek to reduce costs by operating fewer flights with smaller planes. Each of those actions should, in theory, also reduce an airline's user fees. But in fact, the exact opposite is true. The reason is that the cost of operating air traffic control and providing other aviation-related services is relatively fixed, so a modest reduction in the number of flights or passengers does not significantly reduce spending. And because commercialized services cannot fall back on the deep pockets of government resources, they have to increase fees. This has already happened.

Although 9/11 is blamed for many of aviation's financial problems, a report to Congress in April 2005 by the U.S. Government Accountability Office found that user fees to commercialized aviation service providers in other countries had started to fall even before Sept. 11, 2001, due to stagnant economies and declining air traffic.¹⁷ When passenger loads evaporated after the terrorist attacks, Britain's commercialized NATS air traffic system came close to insolvency and NAVCANADA's “rate stabilization” fund plummeted from a \$75 million surplus earlier in 2001 to a \$166 million deficit by 2003. As the GAO report noted with considerable understatement: “a contingency fund or other mechanism may help to offset the effects of a downturn, although it may not do so completely if the effects are severe.”

17. “Air Traffic Control – Preliminary Observations on Commercialized Air Navigation Service Providers,” U.S. Government Accountability Office, Testimony before the Subcommittee on Transportation and Infrastructure, April 20, 2005. www.gao.gov/new.items/d05542t.pdf

The harmful effects of 9/11 were extreme, but even minor drops in user fee revenue can have major consequences for commercialized, fee-based systems. In Germany, for example, air traffic in 2001 declined a modest 0.9 percent, but the commercialized DFS aviation service provider reported a loss of more than 33 million Euros (about \$40 million U.S), according to the GAO. "To address these deficits, DFS modified investments, canceled projects and ultimately raised fees, thereby increasing financial pressure on the airlines," the GAO reported.

Testimony before Canada's House of Commons in 2004 was even more succinct. "Contrary to the accepted market principles regarding pricing and supply and demand, airports and NAVCANADA are required to raise their charges to offset reduced traffic volumes," said the statement from the Canadian branch of the Air Line Pilots Association. "As the current situation demonstrates, these increases in costs occur precisely when airlines are least able to afford them."¹⁸

Nick Metson of New Zealand Airways made a cogent presentation about user fees and their drawbacks as a funding source for Air Traffic Management (ATM) during an industry conference in Tegucigalpa, Honduras, in September 2002.

Metson cited many difficulties of a fee-based system, including the consequences of airline bankruptcies. As previously noted, if an airline defaults on fees, competitors and other participating stakeholders must make up the shortfall. Not only do user fees fall under the jurisdiction of bankruptcy court, but the legal proceedings inevitably slow collections of those fees, creating a cash-flow problem. In contrast, an excise tax is easily collected, goes directly to the Treasury, and is not subject to rulings by a bankruptcy judge.

Metson's presentation on user fees included the following summary:

1. Airlines receive paybacks in growth years.
2. Air traffic systems can also build reserves in fat years.
3. But airlines will pay higher fees when air traffic falls.

His overall conclusion: "ATM finance is not designed for a downturn."

18. Submission to the House of Commons Standing Committee on Transport, Air Line Pilots Association International Canada, March 11, 2004. <http://cf.alpa.org/Internet/TM/tm050902.html>

INCONVENIENT QUESTIONS

As many people have learned the hard way when coping with new legislation from Congress, the devil is in the details. And one little detail about user fees that seems to have been ignored is how they would be collected.

Collecting the current excise tax on tickets is virtually automatic, and since the tax is a flat percentage of the ticket price, there is little to argue about. But when user fees are based on multiple variables, any lawyer could probably find many issues to haggle over. And if user fees are extended to business aviation, instead of collecting taxes from a relatively small number of airlines, the FAA would need to deal with hundreds or thousands of individuals, organizations and companies.

Is the FAA – or any part of the FAA that could be spun off into a quasi-independent organization – even remotely qualified to be a bill collector? How much would it cost the FAA to assess and collect the fees, to cope with questions or objections, or to track down deadbeats? The IRS is widely criticized for the huge expense of tax collection; should we expect the FAA to do any better?

Another topic on which proponents are vague is whether the FAA, or part of it, would be privatized or commercialized. In the GAO's report earlier this year on five commercialized air navigation service providers in other countries, it said that "each operates as a business, making and carrying out its own strategic, operational and financial decisions. Each generates and manages its own revenue to cover its costs, charging fees to users and borrowing funds from private markets instead of relying on annual governmental appropriations."

In theory, the FAA should be able to collect user fees while remaining a completely governmental agency. But in practice, it is difficult to believe that any fee system could withstand meddling by Congress or the White House whenever vocal constituents and/or campaign contributors began complaining about the "fairness" of the fees applied to them.

Privatization – Threat or Menace?

Any discussion about user fees inevitably includes commercialization or privatization of FAA activities – (i.e., farming them out to a private contractor. Generally, advocates of user fees mostly favor privatization).

Extensive discussion of the pluses and minuses of privatization – whether for air traffic controllers or other aviation services now provided by the FAA – are beyond the scope of this paper. Personally, however, I believe privatization to be one of the truly bad ideas in a public/private sector that is already full of bad ideas.

Do we really want air traffic control or other FAA services subject to the same economic vagaries that have ravaged the airlines? The damage to their human capital over the past two decades has been mind-numbing.

I believe we have a choice. Do we adopt an unstable business model that links aviation services to the health of the airline industry, where we alternate between ruthless cost-cutting, that

eliminates capable, experienced personnel, and frantic hiring and training of fresh-faced newcomers to cope with another brief period of sunny skies for the airlines?.

Could the FAA be improved, or made more efficient? Of course. But that hardly justifies abandoning a system that for all its faults has created the world's largest aviation system, which – on most days – performs with a reasonable level of efficiency and a remarkable level of safety.

TURBULENCE AHEAD

As a longtime observer of the U.S. network airlines, and as their frequent defender on many issues, I believe I have earned the right to disagree with them. And I hope they will accept my opinions in constructive fashion, recognizing that I fully endorse America's need for a modern, efficient and economically healthy aviation system¹⁹.

The airlines do put forward good ideas from time to time. But when it comes to user fees, I believe the major carriers are backing the wrong horse. Not only will user fees fail to improve the nation's commercial aviation system, they will fail to provide any competitive benefits.

In fact, I will go further and say that user fees are a train wreck waiting to happen. And the likely victims will be the network airlines, the Federal Aviation Administration, the nation's aviation infrastructure and America's taxpayers.

From a fairness perspective, I do not think user fees would make much difference. Sure, some users might pay a bit more and others may pay a bit less. But does anybody seriously believe that the current winners and losers in the airline business are going to switch places? The Southwests and jetBlues of the world are thumping the legacy airlines because of smarter management and more cooperative, better-motivated employees – not because they save a buck or two on the ticket tax.

So I do not believe there is much upside to user fees, but there is a huge downside.

First, as this paper explored in detail, the nature of commercialized, fee-based services means that when airlines are facing tough times, their fees go up – just when the users can least afford to pay them.

Second, the vagaries of U.S. bankruptcy law make it possible for airlines to avoid the fees altogether. And the other users – again, primarily the airlines – are forced to make up the shortfall. At that point, the revenue system has truly gone from bad to worse.

Third, a user fee system practically invites Congress to start imposing other fees for other reasons. In the long run, creating that opportunity for unfettered taxation may be the worst consequence of them all. Congressman Mica's recent statement about airlines being tax collectors and not actually paying taxes proves the dangers out thereabout increased taxes and/or fees.

In a statement to Canada's House of Commons in March, 2004, Air Canada Jazz pilot Dan Adamus eloquently summarized many frustrations about privatized aviation services. Referring to the woes of Canada's airlines, including the bankruptcy filing of Air Canada four months earlier, Adamus said: "The Government of Canada continues to view the airline industry and passengers as a cash cow; [and] government-mandated monopolies, airports and NAVCANADA continue to raise fees when the airline industry can least afford it. To use an aviation term, the industry is in imminent danger of spiraling down out of control."²⁰

19. It should be noted that previously I argued on behalf of the major airlines for changes to the funding mechanism of the FAA. This was during a time period when we all thought that enplanements would go up to unbelievable levels. Most of those arguments fell by the wayside after the declines from the meltdown of the NASDAQ. As to the future, the major airlines are sharply divided right now about their own expansion plans for the United States with many of them opting for consolidation and fewer flights to maintain fares at high levels.

20. Submission to the House of Commons Standing Committee on Transport, Air Line Pilots Association International Canada, March 11, 2004. <http://cf.alpa.org/Internet>

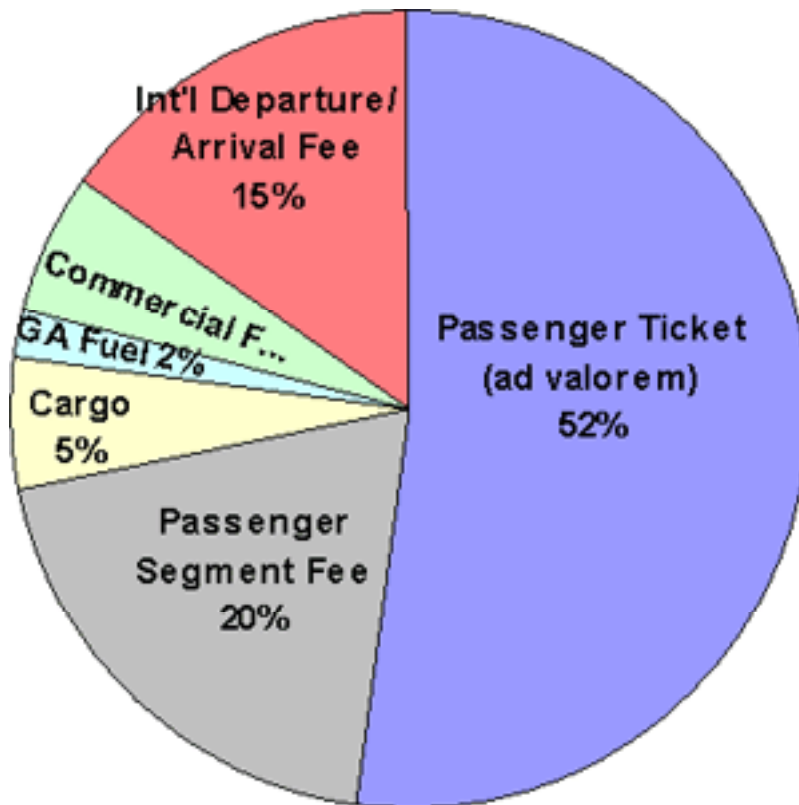
While taxes have their disadvantages, one of their undeniable benefits is that it requires an act of Congress to raise them. Members of Congress generally try to avoid creating new taxes or increasing old ones because they know the result, a month before their next election, will be a voice-of-doom TV ad pointing out that “Congressman So-and-So voted twenty-three times to take more money out of your pocket.” That means when Congress is involved, there’s always a fighting chance of fending off a tax increase.

Setting user fees, however, is an administrative function. And if you create a stand-alone organization to do the setting, you also make it tougher for your friends in Congress to do much about it.

Once a door is opened to a new variation of fees or taxes, it’s almost impossible to slam it shut. The best advice I can offer the airlines is for them to remember the timeless Chinese proverb: Be careful what you wish for.

Appendix A - **AVIATION TRUST FUND**

Estimated Tax Revenues, By Source, for Fiscal Year 2004



Passenger Ticket Tax (7.5%) \$4.627 billion

Flight Segment Fee: \$1.80 billion

Inter'l Arrival/Departure Tax: \$1.39 billion

Frequent Flier Tax: \$145 million

Cargo/Mail Tax: \$499 million

General Aviation Fuel Tax: \$177.9 million

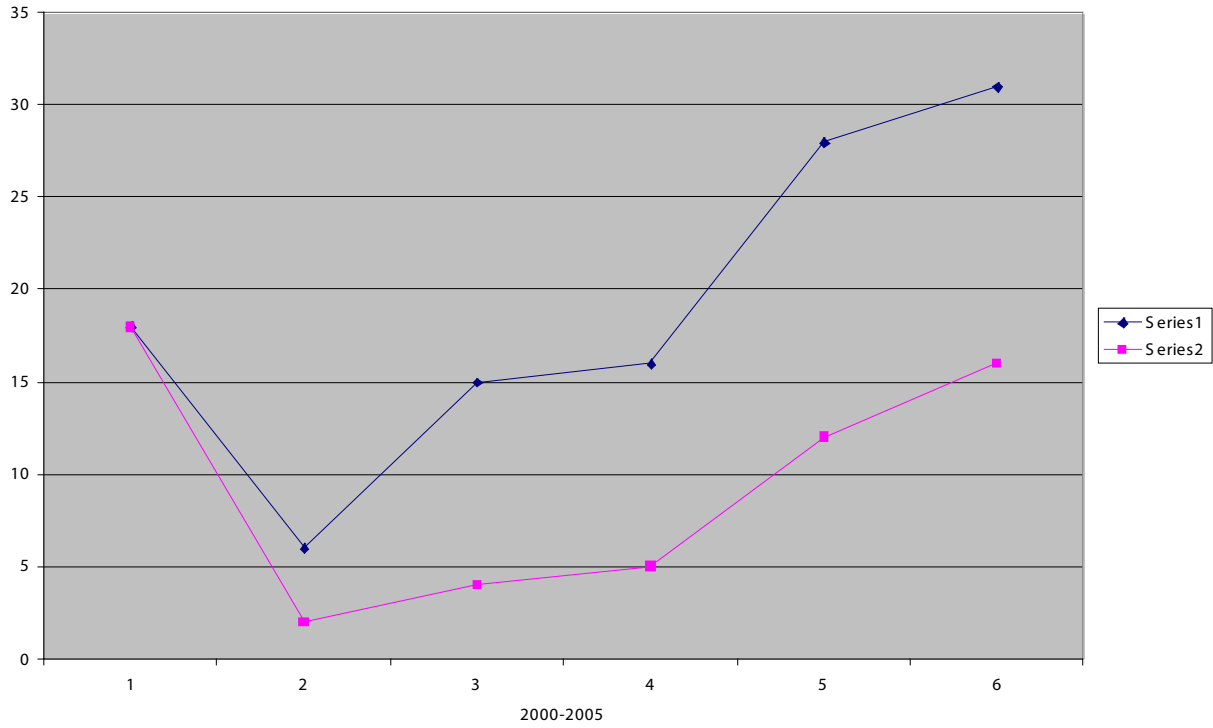
Commercial Fuel Tax: \$534.3 million

Sources: Federal Aviation Administration, 2005; U.S. House of Representatives Subcommittee on Aviation, "Hearing on Financial Conditions of the Aviation Trust Fund: Are Reforms Needed?" May 4, 2005.

Appendix B - FARE INCREASES SINCE 2000 (ATTEMPTS AND SUCCESSES)

Source: ATPCO Filings

Fare increases since 2000 (attempts and successes)

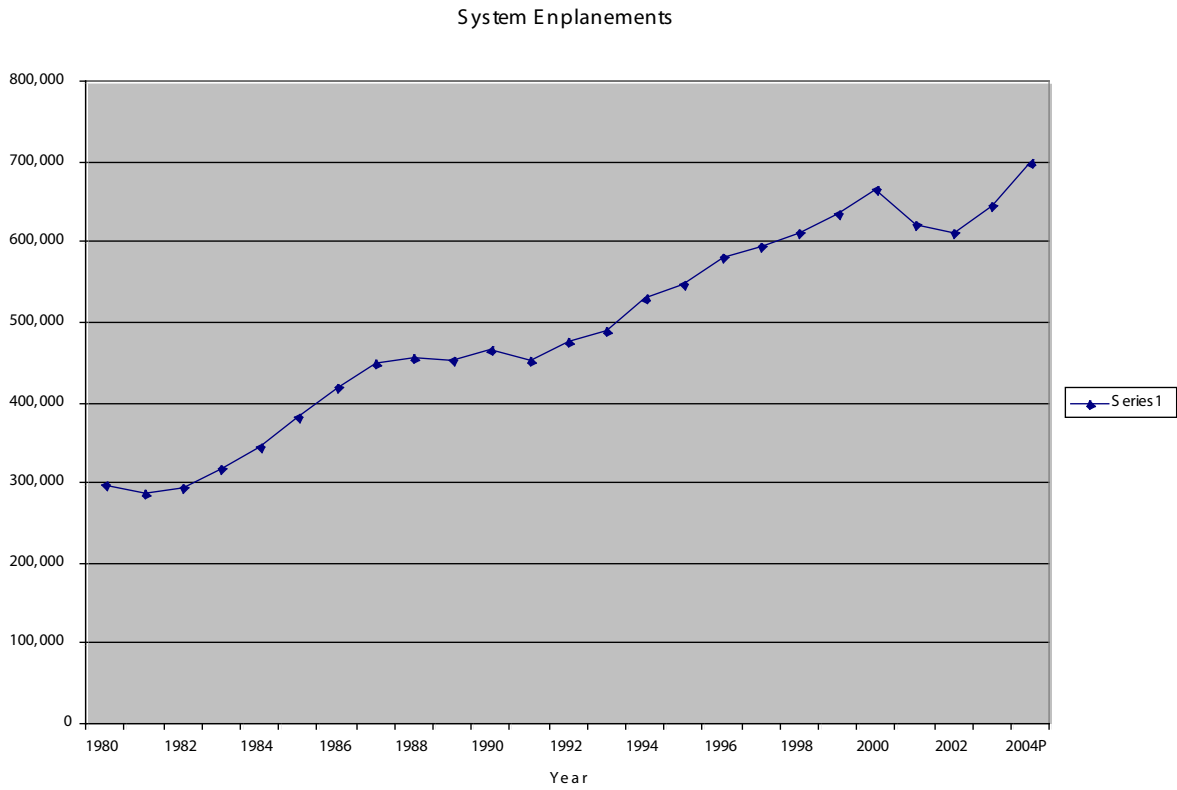


Appendix C - **YIELD FOR 2005**

¢/RPM	% Chg. Yr/Yr	¢/RPM	% Chg. Yr/Yr	¢/RPM	% Chg. Yr/Yr	¢/RPM	% Chg. Yr/Yr	
January	11.22	-7.8	10.21	3.7	12.15	-5.3	10.05	7.2
February	11.47	-7.7	10.47	3.8	12.05	-4.6	9.56	4.9
March	11.75	-4.8	9.81	1	12.13	-3.4	9.65	3.7
April	11.81	-2.4	10.45	9.4	12.28	-4.8	10.41	12.6
May	11.6	0.1	10.53	3	12.15	-2.1	9.82	3.8
June	11.89	3.2	11.95	7.7	12.52	2.3	9.91	5.1
July	11.59	4.8	12.03	8.1	12.56	6.2	10.29	3.1
August	11.41	5.5	11.36	7.5	12.08	4.6	11	0.4
September	11.79	8.5	11.52	11.9	12.1	8	10.67	8.7
October	11.98	8.1	11.15	6.9	12.2	4.9	10.39	5.4
November								
December								
YTD								

Appendix D - **SYSTEM EMPLANEMENTS**

Source: ATA Website: <http://www.airlines.org/econ/d.aspx?nid=9052>



Appendix E - "Annual Operations, Traffic and Capacity: U.S. Airlines, Scheduled Services," Air Transport Association

ANNUAL OPERATIONS, TRAFFIC, AND CAPACITY
U.S. AIRLINES -- SCHEDULED SERVICES

The data below reflects the activity of U.S. passenger and cargo airlines as defined by the U.S. Department of Transportation under Chapter 411 of Title 49 of the U.S. Code.

YEAR	Depts.	Enplanements			RPMs			ASMs			PLF			Freight RTMs			Mail RTMs		
	0	0			(millions)			(millions)		(percent)			(millions)			(millions)			
	SYS	DOM	INT	SYS	DOM	INT	SYS	DOM	INT	SYS	DOM	INT	SYS	DOM	INT	SYS	DOM	INT	SYS
1926	N/A	6	N/A	N/A	1.3	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
1927	N/A	9	N/A	N/A	1.9	0.004	1.9	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
1928	N/A	48	1	50	11	0.3	11	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	
1929	N/A	162	11	173	35	3	38	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	
1930	N/A	385	33	418	85	8	93	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	
1931	N/A	472	59	532	107	14	121	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	
1932	N/A	476	72	548	127	21	148	304	N/A	N/A	42	N/A	N/A	N/A	N/A	N/A	N/A	N/A	
1933	N/A	500	76	576	174	25	200	374	N/A	N/A	46.7	N/A	N/A	N/A	N/A	N/A	N/A	N/A	
1934	N/A	472	100	572	189	37	227	368	N/A	N/A	51.4	N/A	N/A	N/A	N/A	N/A	N/A	2	
1935	N/A	679	111	790	281	47	328	578	N/A	N/A	48.7	N/A	N/A	1	N/A	1	4	N/A	
1936	N/A	929	91	1,020	391	56	447	686	N/A	N/A	56.9	N/A	N/A	2	N/A	2	6	N/A	
1937	N/A	981	109	1,090	410	53	463	836	102	938	49.1	51.5	49.3	2	N/A	2	7	N/A	
1938	N/A	1,197	109	1,306	480	53	533	951	116	1,068	50.4	45.7	49.9	2	N/A	2	7	N/A	
1939	N/A	1,735	129	1,864	683	72	755	1,215	134	1,350	56.2	53.5	55.9	3	N/A	3	9	N/A	
1940	N/A	2,803	163	2,966	1,052	100	1,152	1,817	175	1,993	57.9	56.9	57.8	3	N/A	3	10	N/A	
1941	N/A	3,849	229	4,078	1,385	163	1,548	2,342	249	2,591	59.1	65.4	59.7	5	N/A	5	13	N/A	
1942	N/A	3,129	277	3,406	1,418	237	1,655	1,963	314	2,277	72.2	75.7	72.7	12	N/A	12	21	N/A	
1943	N/A	3,012	303	3,315	1,632	246	1,878	1,855	310	2,164	88	79.4	86.8	15	5	20	36	N/A	
1944	N/A	4,027	361	4,388	2,177	312	2,489	2,435	393	2,828	89.4	79.3	88	17	6	23	51	N/A	
1945	N/A	6,541	511	7,052	3,360	450	3,810	3,811	588	4,399	88.2	76.6	86.6	22	9	31	65	N/A	
1946	N/A	12,164	1,091	13,255	5,945	1,104	7,049	7,550	1,561	9,110	78.7	70.7	77.4	39	15	54	33	N/A	
1947	N/A	12,822	1,428	14,250	6,105	1,814	7,920	9,364	2,934	12,298	65.2	61.8	64.4	65	33	98	33	N/A	
1948	2,092	13,094	1,447	14,541	5,997	1,894	7,890	10,417	3,303	13,720	57.6	57.3	57.5	102	46	148	38	N/A	
1949	2,262	15,121	1,599	16,720	6,768	2,060	8,827	11,712	3,639	15,351	57.8	56.6	57.5	134	56	190	41	N/A	
1950	2,457	17,468	1,752	19,220	8,029	2,214	10,243	13,125	3,717	16,842	61.2	59.6	60.8	211	61	271	47	N/A	
1951	2,596	22,711	2,140	24,851	10,590	2,614	13,204	15,615	4,369	19,984	67.8	59.8	66.1	217	78	295	64	22	
1952	2,737	25,176	2,391	27,567	12,559	3,065	15,624	19,170	4,955	24,125	65.5	61.9	64.8	244	86	330	69	22	
1953	2,960	28,901	2,745	31,646	14,794	3,451	18,245	23,337	5,624	28,962	63.4	61.4	63	254	94	347	73	24	
1954	3,002	32,529	2,919	35,448	16,802	3,810	20,613	26,922	6,455	33,377	62.4	59	61.8	248	106	353	82	35	
1955	3,281	38,221	3,488	41,709	19,852	4,499	24,351	31,371	7,203	38,574	63.3	62.5	63.1	319	116	434	87	52	
1956	3,503	41,937	4,068	46,005	22,399	5,226	27,625	35,366	8,308	43,674	63.3	62.9	63.3	351	153	504	93	55	
1957	3,771	45,162	4,304	49,466	25,379	5,882	31,261	41,746	9,313	51,059	60.8	63.2	61.2	396	158	554	99	57	
1958	3,629	48,298	4,772	53,070	25,375	6,124	31,499	42,724	10,392	53,115	59.4	58.9	59.3	387	164	550	108	77	
1959	3,910	54,958	5,338	60,296	29,308	7,064	36,372	48,405	10,842	59,247	60.5	65.2	61.4	450	196	646	121	88	
1960	3,853	56,351	5,906	62,257	30,557	8,306	38,863	52,220	13,347	65,567	58.5	62.2	59.3	477	226	703	136	113	

Appendix E - Continued

1961	3.750	56.900	6.112	63.012	31.062	8.769	39.831	56.087	15.770	71.857	55.4	55.6	55.4	533	261	794	153	157	310
1962	3.660	60.739	7.079	67.818	33.623	10.138	43.760	63.888	18.724	82.612	52.6	54.1	53	637	331	968	167	183	350
1963	3.788	69.366	8.037	77.403	38.457	11.905	50.362	72.255	22.590	94.845	53.2	52.7	53.1	715	383	1,097	175	192	368
1964	3.955	79.139	9.381	88.520	44.141	14.352	58.494	80.524	25.791	106.316	54.8	55.6	55	894	486	1,380	192	191	383
1965	4.198	92.073	10.847	102.920	51.887	16.789	68.676	94.787	29.533	124.320	54.7	56.8	55.2	1,112	708	1,820	228	265	493
1966	4.374	105.789	12.272	118.061	60.591	19.298	79.889	104.669	33.176	137.844	57.9	58.2	58	1,301	848	2,149	294	468	762
1967	4.946	128.479	14.020	142.499	75.487	23.259	98.747	133.700	41.119	174.819	56.5	56.6	56.5	1,498	952	2,450	408	578	986
1968	5.348	145.774	16.407	162.181	87.508	26.451	113.958	166.871	49.575	216.446	52.4	53.4	52.6	1,775	1,135	2,910	567	700	1,268
1969	5.378	158.405	13.493	171.898	102.717	22.703	125.420	206.434	44.412	250.846	49.8	51.1	50	2,126	1,224	3,350	806	544	1,350
1970	5.120	153.662	16.260	169.922	104.147	27.563	131.710	213.160	51.960	265.120	48.9	53	49.7	2,215	1,299	3,514	714	756	1,470
1971	4.999	156.195	17.474	173.669	106.438	29.219	135.658	221.503	58.320	279.823	48.1	50.1	48.5	2,278	1,518	3,795	707	606	1,313
1972	5.046	172.452	18.897	191.349	118.138	34.268	152.406	226.614	60.797	287.411	52.1	56.4	53	2,567	1,738	4,305	367	505	872
1973	5.135	183.272	18.936	202.208	126.317	35.640	161.957	244.699	65.898	310.597	51.6	54.1	52.1	2,922	1,916	4,837	414	512	927
1974	4.726	189.733	17.725	207.458	129.732	33.186	162.919	233.880	63.126	297.006	55.5	52.6	54.9	2,888	2,083	4,971	544	460	1,004
1975	4.705	188.746	16.316	205.062	131.728	31.082	162.810	241.282	61.724	303.006	54.6	50.4	53.7	2,747	2,048	4,795	533	415	948
1976	4.833	206.279	17.039	223.318	145.271	33.717	178.988	261.248	61.574	322.822	55.6	54.8	55.4	2,909	2,187	5,096	717	407	1,125
1977	4.937	222.283	18.043	240.326	156.609	36.610	193.219	280.619	64.947	345.566	55.8	56.4	55.9	3,125	2,302	5,427	751	408	1,159
1978	5.016	253.957	20.759	274.716	182.669	44.112	226.781	299.542	69.209	368.751	61	63.7	61.5	3,505	2,314	5,820	806	374	1,180
1979	5.400	292.700	24.163	316.863	208.891	53.132	262.023	332.796	83.330	416.126	62.8	63.8	63	3,466	2,498	5,964	851	372	1,223
1980	5.353	272.829	24.074	296.903	200.829	54.363	255.192	346.028	86.507	432.535	58	62.8	59	3,277	2,465	5,742	947	393	1,340
1981	5.212	265.304	20.672	285.976	198.715	50.173	248.888	346.172	78.725	424.897	57.4	63.7	58.6	3,350	2,336	5,686	995	376	1,371
1982	4.964	274.342	19.760	294.102	210.149	49.495	259.644	359.528	80.591	440.119	58.5	61.4	59	3,039	2,443	5,482	1,001	400	1,401
1983	5.034	296.721	21.917	318.638	226.909	54.920	281.829	379.150	85.388	464.538	59.8	64.3	60.7	3,385	2,708	6,093	1,063	415	1,477
1984	5.448	321.047	23.636	344.683	243.692	61.424	305.116	422.507	92.817	515.323	57.7	66.2	59.2	3,565	3,001	6,567	1,160	457	1,617
1985	5.835	357.109	24.913	382.022	270.584	65.819	336.403	445.826	101.963	547.788	60.7	64.6	61.4	3,144	2,887	6,031	1,212	413	1,626
1986	6.427	393.864	25.082	418.946	302.090	64.456	366.546	497.991	109.445	607.436	60.7	58.9	60.3	3,990	3,354	7,344	1,246	402	1,648
1987	6.581	416.831	30.847	447.678	324.637	79.834	404.471	526.958	121.763	648.721	61.6	65.6	62.3	4,340	3,921	8,260	1,313	409	1,721
1988	6.700	419.210	35.404	454.614	329.309	93.992	423.302	536.663	140.140	676.802	61.4	67.1	62.5	4,843	4,789	9,632	1,367	443	1,810
1989	6.622	416.331	37.361	453.692	329.975	102.739	432.714	530.079	154.297	684.376	62.3	66.6	63.2	4,916	5,359	10,275	1,415	464	1,879
1990	6.924	423.565	41.995	465.560	340.231	117.695	457.926	563.065	170.310	733.375	60.4	69.1	62.4	5,075	5,471	10,546	1,489	513	2,003
1991	6.783	412.360	39.941	452.301	332.566	115.389	447.955	543.638	171.561	715.199	61.2	67.3	62.6	4,946	5,279	10,225	1,412	493	1,905
1992	7.051	431.693	43.415	475.108	347.931	130.622	478.554	557.989	194.784	752.772	62.4	67.1	63.6	5,284	5,845	11,130	1,573	496	2,069
1993	7.245	443.172	45.348	488.520	354.177	135.508	489.684	571.489	200.151	771.641	62	67.7	63.5	5,458	6,486	11,944	1,673	503	2,176
1994	7.531	481.755	47.093	528.848	378.990	140.391	519.382	585.438	198.893	784.331	64.7	70.6	66.2	5,980	7,812	13,792	1,759	511	2,270
1995	8.062	499.000	48.773	547.773	394.708	145.948	540.656	603.917	203.160	807.078	65.4	71.8	67	6,397	8,181	14,578	1,815	529	2,343
1996	8.230	530.708	50.526	581.234	425.596	153.067	578.663	626.389	208.682	835.071	67.9	73.3	69.3	6,596	8,705	15,301	1,888	566	2,454
1997	8.127	542.001	52.724	594.725	442.640	160.779	603.419	640.319	216.913	857.232	69.1	74.1	70.4	7,169	10,789	17,959	1,993	562	2,555
1998	8.292	559.653	53.232	612.885	454.430	163.656	618.087	649.362	224.728	874.089	70	72.8	70.7	7,002	11,129	18,131	1,856	509	2,365
1999	8.627	582.880	53.079	635.959	480.134	171.913	652.047	687.502	230.917	918.419	69.8	74.4	71	7,289	12,028	19,317	1,798	498	2,296
2000	9.035	610.600	55.550	666.150	508.403	184.354	692.757	714.454	242.496	956.950	71.2	76	72.4	7,953	13,490	21,443	1,916	529	2,445
2001	8.788	570.126	52.003	622.129	480.348	171.352	651.700	695.200	235.311	930.511	69.1	72.8	70	7,332	12,787	20,119	1,412	473	1,885
2002	9.187	560.107	52.769	612.877	476.004	165.098	641.102	676.949	215.606	892.554	70.3	76.6	71.8	9,819	13,424	23,243	886	462	1,348
2003	10.839	592.412	53.863	646.276	500.271	156.638	656.909	689.069	204.755	893.824	72.6	76.5	73.5	12,342	13,021	25,363	880	492	1,372
2004P	11.182	635.515	62.276	697.792	550.471	181.455	731.926	739.540	229.437	968.976	74.4	79.1	75.5	13,163	13,544	26,707	818	477	1,296