



23 January, 2026

Matthew Cherry  
Economics Director  
Economic Regulation and Competition Policy  
Consumers and Markets Group  
UK Civil Aviation Authority  
11 Westferry Circus, Canary Wharf,  
London,  
E14 4HD

Email: [economicregulation@caa.co.uk](mailto:economicregulation@caa.co.uk)

Subject: UK CAA - CAP 3202: Call for inputs – review of the Traffic Distribution Rules 1991

Dear Mr. Cherry,

American Airlines (AA) is pleased to submit these comments in response to the above-referenced Call for Inputs.

American Airlines has a longstanding and deep commitment to service at London's Heathrow Airport. Through its Atlantic Joint Business with British Airways, AA offers extensive connections between the U.S. and Europe from LHR, creating an expansive network that provides substantial economic value and benefits for consumers.

AA strongly supports the comments submitted by International Airlines Group as well as the comments submitted by the International Air Transport Association, which highlight the critical importance of the Worldwide Airport Slots Guidelines (WASG). AA takes this opportunity to highlight a few key points.

- The WASG are the global industry standard and are critical to ensuring fair, transparent, and efficient allocation of scarce landing/take-off slots while balancing the interests of all stakeholders and maximizing consumer choice and connectivity.
- AA agrees with IAG that as a matter of regulatory principle, Traffic Distribution Rules (TDRs) are discriminatory, outdated and distortive tools that constrain airlines' flexibility to respond to market changes and risk reciprocal retaliation from international partners. AA strongly supports adherence to the WASG, which provide a more effective and fair allocation of scarce capacity at congested airports.



- AA further supports IAG's position that review of the 1991 TDRs should be considered within the broader context of potential slot reform and Heathrow expansion and urges caution to avoid any abrupt changes that could undermine competition, connectivity or operational resilience.

AA appreciates the opportunity to submit these comments.

Sincerely,

Ronce Almond  
Managing Director, Head of International Government Affairs  
American Airlines  
[roncevert.almond@aa.com](mailto:roncevert.almond@aa.com)