

June 10, 2011

Dear Cranky Flier,

One of the things I appreciate about your site is you are very open about your relationship to companies in the airline industry. And just one month after Lufthansa gave you a free round-trip, business class ride on its A380 from San Francisco to Frankfurt,ⁱ perhaps I should not be surprised at your [dismissive response to my report](#).

I hope that given the amount of space you took to tear [our report](#) down, you will provide some space for our response.

Despite your attempt to rip the report apart, I personally think it raises issues potentially more interesting than your detailed run-down of the free ride (though I was particularly disappointed you had trouble sleeping, I am glad you enjoyed the salmon appetizer, traditional Swabian dumplings and pretzel roll the airline served you.)ⁱⁱ But I guess I'm biased.

The Department of Transportation data in the report is real, and to my knowledge is the only reliable U.S. source of compiled complaint information on international airlines. If the DOT is willing to use these numbers to “to determine the extent to which carriers are in compliance with federal aviation consumer protection regulations,”ⁱⁱⁱ then they're good enough for me. Even if I am just a research analyst at a union.

You're right, I could have used the raw numbers, but I sort of agree with you that the raw numbers themselves aren't incredibly exciting on their own. They're small because, well, how many people actually go through the effort to submit their airline complaints to the U.S. government? (If you care about an answer, you can look at the DOT analysis for the new passenger rights rule, where the DOT uses the ratio that every 1 complaint submitted to the DOT represents about 61 complaints submitted to the foreign airlines.^{iv})

Additionally, I assume not many people even know about the option of submitting airline complaints to the government. Perhaps you would be willing to talk to your friends at Lufthansa about making this avenue of expression known to customers?

Anyway, as is, I could have used raw numbers and multiplied everything by 61 to make for better graphs, but that seemed like a waste of time. What was interesting to me was the trend over time and a comparison between airlines. After all, we've only got one data set to use, and all of the airlines have a level playing field, at least when the complaint numbers are adjusted for passenger numbers as is the case in my report.

The result of that comparison was clear. Lufthansa complaints went up, Air France and British Airways complaints went down. Is the sample number of complaints small? Yes. But if the increases were random, would Lufthansa have seen them in 7 out of 8 top categories from 2009 to 2010? If they were random, wouldn't Air France and British Airways have seen more fluctuation too?

I believe the data in the report raises legitimate questions. We believe that something is causing the changes at Lufthansa and passengers (and revered bloggers) should be asking questions of the airline to get to the bottom of it.

For example, what impact is Lufthansa's Climb 2011 cost-cutting program having on the passenger experience?

And perhaps one last relevant question if you get any more free trips on the Lufthansa A380s, "When was the Trent 900 engine on this plane last checked?"^v

Sincerely,

Kyle Schafer
UNITE HERE

ⁱ <http://crankyflier.com/ethics/>

ⁱⁱ <http://crankyflier.com/2011/05/12/flying-the-lufthansa-a380-inaugural-to-san-francisco-trip-report/>

ⁱⁱⁱ http://airconsumer.dot.gov/CP_AirlineService.htm

^{iv} Table 16, PDF Page 42 (Report Page 38), Final Regulatory Analysis: Consumer Rulemaking: Enhancing Airline Passenger Protections II

^v <http://www.businessweek.com/news/2010-12-03/lufthansa-operated-a380-with-suspect-engine-for-past-two-weeks.html>

You can download the original UNITE HERE report at <http://www.lufthansaalert.org/wp-content/uploads/Lufthansa-Complaint-Report.pdf>.

You can read the Cranky Flier post at <http://crankyflier.com/2011/06/09/when-statistics-attack-union-report-on-lufthansa-complaint-spike-is-simply-misleading/>.