Frontier Airlines, Inc.
4545 Airport Way
Denver, Colorado 80239

October 23, 2025

Maddie Lubeck
Operations Clerk
U.S. Senate Committee on the Judiciary
Washington, DC

Re: U.S. Senate Committee on the Judiciary, Subcommittee on Antitrust, Competition Policy, and Consumer Rights "Examining Competition in America's Skies" - Responses to Submitted Questions

Thank you for the opportunity to share Frontier's perspective on ensuring fair competition and affordable airfare for all Americans. Below are our responses to questions from Senator Cory A. Booker, submitted to Frontier on October 7, 2025:

1. During your testimony to the subcommittee, you suggested that smaller airliners should be exempt from antitrust scrutiny to "level the playing field" with the larger airlines. You contend that this would enable smaller airlines to compete in larger, contested markets.
    a. Could immunity from antitrust laws for small carriers lead those carriers to engage in anticompetitive practices, such as price coordination or the sharing of sensitive information?

       While any exemption from antitrust scrutiny requires thoughtful oversight, smaller carriers lack the market share, route concentration, and pricing power to materially influence fares in the same way as the Big 4 carriers. Limited relief from antitrust constraints for small carriers would allow greater collaboration and efficiency, helping to level the playing field against the dominant networks that already control over 80% of domestic capacity and effectively coordinate through joint ventures and alliances.

    b. Please describe why the government should allow mergers and acquisitions without any government scrutiny?

       We believe mergers or joint ventures exclusively among non-Big 4 carriers should receive streamlined or expedited approval given the massive imbalance in the U.S. aviation market. The Big 4 carriers command over

80% of domestic share, limiting competition and consumer choice. Allowing smaller carriers to consolidate or partner freely would create viable competitors with sufficient scale to offer more routes, better connectivity, and lower fares, ultimately benefiting consumers through stronger competition with the Big 4.

2. The passenger experience on airlines has declined over the decades and has become a major concern within the industry. Seat sizes have decreased and ancillary fees for commodities such as baggage or on-flight entertainment have increased. During your testimony, you discussed unbundling Frontier's economy-class tickets so that fares no longer include carry-on baggage and instead created a "New Frontier" economy class that does include carry-on baggage.

    a. Why did Frontier choose to unbundle economy class tickets? Can you provide information on how unbundling has led to decreases in average fares and savings per passenger?

    Frontier's unbundling strategy is centered on consumer choice, transparency, and affordability. We believe customers should have full control over how they spend their travel dollars. Our Basic Fare is designed not only for travelers who prefer the lowest possible price, but also for those who want to customize their trip, choosing exactly which options they want to purchase, rather than paying for features they don't need.

    In addition to Basic, we offer a range of bundled options - Economy, Premium, and Business Bundles - each combining popular ancillaries such as bags, seat selection, priority boarding, and flexibility benefits. These bundles are clearly presented on our home page and throughout the booking process, making it simple for customers to compare options and select what best fits their needs and budget. Importantly, our bundles are aligned with, or more comprehensive than, what other U.S. carriers offer, ensuring travelers receive excellent value and flexibility regardless of how they choose to fly.

    Frontier remains committed to providing the lowest price to its customers, no matter which options they choose when they fly. The New Frontier Economy and other bundle options simply make those decisions clearer and easier from the first step in the booking process.

Frontier Airlines, Inc.
4545 Airport Way
Denver, Colorado 80239

b. Has customer satisfaction increased as a result of unbundling and associated fees? What other data or metrics can you provide to demonstrate the benefits of unbundling?

Unbundling has been a cornerstone of our business model for over a decade, empowering customers with greater choice and control over how they spend their travel dollars. Rather than a one-size-fits-all approach, we offer a customizable experience that allows travelers to pay only for the services they value most.

Over the past year, we've taken significant steps to enhance transparency and ease of use through the launch of the New Frontier. This initiative simplifies the booking process and clearly presents prices for options like bags, seat selection, and flexibility all with a single click. These updates have improved clarity, reduced customer confusion, and reinforced the core benefits of unbundling: affordability, transparency, and control. As a result, we have seen a significant reduction in customer complaints, an improved Net Promoter Score (NPS), and dramatic growth in our loyalty programs.

3. During your testimony, you mentioned low demand, high cost, and ATC inefficiency are barriers to market entry for connecting smaller airports to vacation destinations.

   a. Do you believe these barriers are natural features of the industry, or are they caused by the anticompetitive actions of legacy carriers?

   While factors such as demand density, airport infrastructure, and operating costs are natural industry constraints, anticompetitive practices by large legacy carriers often amplify these barriers. The Big 4 carriers dominate slot-controlled and congested airports, where they frequently secure and retain takeoff and landing slots, even when not flying them as actively as smaller carriers would. This practice limits access of low-cost and ultra-low-cost carriers that could otherwise stimulate competition and lower fares for consumers.

   In addition, legacy carriers often leverage their size and long-standing relationships to obtain preferential gate access and favorable scheduling, further restricting entry opportunities. These structural advantages make it

extremely difficult for smaller airlines to compete on equal footing, even when there is clear consumer demand for additional service and lower fares.

b. How does Frontier decide whether to continue or cut back service between smaller airports and vacation destinations?

Frontier's network planning decisions are driven by route performance, demand trends, and profitability. We continuously evaluate load factors, fare levels, and cost inputs to ensure each route supports affordable fares and sustainable operations. If a market cannot sustain low fares and sufficient load factors, we may temporarily exit the route but remain open to returning if conditions improve.

c. If you leave a region or route and later seek to re-enter, do you face resistance from larger legacy carriers?

Yes - especially when a legacy carrier has developed a fortress hub or focus city in a region, re-entry becomes significantly more difficult. Gate and slot access, marketing dominance, and coordinated frequent-flyer incentives often create structural barriers that make it challenging for smaller competitors to regain a foothold, even when consumer demand supports additional competition.

On behalf of our more than 12,000 Frontier team members, we thank you for your questions and your commitment to ensuring fair competition in the United States. Millions of Americans depend on us for affordable access to air travel and we remain committed to delivering them safely to their destinations.

Sincerely,

Barry Biffle
Chief Executive Officer