

8 January 2024

Ms Jasmina Ackar Director International Air Services Commission GPO BOX 630 CANBERRA ACT 2601

By email: Jasmina.Ackar@infrastructure.gov.au

Dear Ms Ackar,

Additional Information - Indonesia Route

ARRutchard

I refer to your letter of 15 December 2023 inviting Qantas to address the section 9 'additional criteria' of the *International Air Services Commission Policy Statement 2018* in support of our application for an allocation of 2,320 seats of passenger capacity on the Indonesia route.

Qantas' comments addressing section 9 of the Policy Statement are outlined in Attachment 1.

We would be pleased to provide any further information the Commission may require in support of this application.

Yours sincerely,

Anna Pritchard

Executive Manager, Government, Industry & Competition



Proposal

As set out in Qantas' application to the Commission dated 17 November 2023, Jetstar Airways Pty Limited (Jetstar), plans to launch additional services between Australia and Indonesia as outlined in the table below.

Sector	Frequency	Commencement Date
Cairns-Melbourne-Denpasar	Daily	1 May 2024
Adelaide-Perth-Denpasar	3 per week	1 August 2024

It is proposed that these ten additional services will be operated using Airbus A321LR aircraft configured with 232 seats. These services will be operated under a through flight number and from international-to-international terminals.

The proposed flight schedule for the Northern Summer 2024 scheduling season is provided at Attachment 2. All slot approvals have been received.

The International Air Services Commission Act 1992

Allocation of the capacity requested to facilitate Jetstar's plans to expand services on the Indonesia route will deliver the greatest benefit to the public relative to the competing application from the Virgin Australia and will promote the object of the *International Air Services Commission Act 1992* by:

- Bringing a new daily frequency to Cairns (via Melbourne) that is not served by any other airline;
- Providing additional options for consumers travelling from Adelaide/Perth to Denpasar at convenient timings;
- Offering additional itinerary options through onward services on Jetstar and Qantas' extensive domestic, regional and international network; and
- Placing further downward pressure on airfares on the Indonesia route, with Jetstar's low pricing actively stimulating demand.

Section 9 Criteria – Minister's Policy Statement

Competition criteria

(a) desirability of fostering an environment in which Australian carriers can effectively compete with each other and with foreign carriers on the route in question

Indonesia is Australia's ninth largest inbound market and second largest outbound market.¹ From 2017 to 2019, the Indonesia route recorded average year-on year-growth for passengers and seat capacity of 8.5 per cent and 8 per cent respectively.²

In the year to the end of September 2023, seat capacity on the Indonesia route returned to 98 per cent of pre-COVID levels with 3,686,343 seats being operated.³ During this period, 3,104,925 passengers travelled on the route and average seat utilisation was 84 per cent.⁴

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¹ Australian Bureau of Statistics, Overseas Arrivals and Departures (short-term)

² Bureau of Infrastructure, Transport and Regional Economics, International operated flights and seats

³ Bureau of Infrastructure, Transport and Regional Economics, International operated flights and seats, 12 months to September 2023

⁴ Ibid

The Australia-Indonesia route is principally a leisure market, with 78 per cent of passengers travelling for holiday purposes and 11 per cent visiting friends and relatives (VFR).⁵ In Financial Year 2023, the majority of traffic travelled to/from Victoria (28 per cent), followed by New South Wales (26 per cent) and Western Australia (23 per cent).6

From an inbound tourism perspective, visitors from Indonesia are forecast to grow by 80 per cent (162,000 more arrivals) between 2023 and 2028. Indonesia has been identified as a market that is expected to fully recover in 2024 and experience ongoing growth.

The air services arrangements provide for 25,000 seats per week for passenger services to/from Sydney, Melbourne (including Avalon), Brisbane and/or Perth and Indonesia and capacity is unlimited for services to/from all other points in Australia. While passenger capacity for services between Australia's main gateways and Indonesia has been fully allocated to Australian carriers, aviation officials of Australia and Indonesia have agreed to discuss updates to the air services agreement to enable continued growth between the two countries. 8

Jetstar's proposed services will utilise additional capacity provided under the Enhanced Regional Package (ERP) under the Australia-Indonesia air services arrangements. Under the ERP, 2,500 seats per week are available on the Indonesia route for services that operate via or beyond to a point in Australia other than Sydney, Melbourne (including Avalon), Brisbane and Perth.⁹

The proposal by Jetstar to utilise the capacity provided under the ERP does not inhibit the ability of any other carrier to launch or grow services at any point in Australia other than Sydney, Melbourne (including Avalon), Brisbane and/or Perth. Jetstar's plans to operate an additional daily frequency to support passenger flows to/from the largest market in Australia (Victoria) and Perth (Western Australia is the third largest market) provide more choice for consumers travelling to Denpasar.

(b) the number of carriers operating on the route in question and the existing distribution of capacity among Australian carriers (including through code sharing and other joint international air services)

There are eight airlines operating direct services between Australia and Indonesia including Batik Air Indonesia, Citilink, Garuda Indonesia, Indonesia AirAsia, Batik Air Malaysia (formerly Malindo Air, operating between Kuala Lumpur and Australia via Denpasar), Jetstar, Qantas and Virgin Australia.

During the year ending September 2023, 10 Jetstar operated the largest number of seats on the Indonesia route (43.4 per cent), followed by Virgin Australia (14.7 per cent) and Qantas at 11.4 per cent. This reflects the existing distribution of capacity among Australian carriers where Qantas' allocation of 20,076 seats per week is largely utilised by Jetstar. Virgin Australia has been allocated a total of 4,924 seats per week on the Indonesia route.

Carrier	Seats to/from Indonesia	% of Seats to/from Indonesia			
Carrier	Oct22-Sep23	Oct22-Sep23			
Batik Air Indonesia	248,946	6.1%			
Garuda Indonesia	248,684	6.1%			
Indonesia AirAsia	370,080	9.1%			
Citilink*	No data available				
Batik Air Malaysia	368,502	9.1%			

⁵ Ibid

⁶ Department of Home Affairs, Overseas Arrivals and Departures data, FY23

⁷ https://www.tra.gov.au/content/dam/austrade-assets/global/wip/tra/documents/tra-tourism-forecasts-for-australia-2023-to-

⁸ https://www.pm.gov.au/media/joint-communique-australia-indonesia-annual-leaders-meeting

⁹ https://www.infrastructure.gov.au/department/media/publications/growth-potential-australian-airlines

¹⁰ Bureau of Infrastructure, Transport and Regional Economics, International operated flights and seats, 12 months to September 2023, excluding Batik Air Malaysia, which is sourced from Cirium DiioMi

Jetstar	1,761,037	43.4%	
Qantas Airways	462,188	11.4%	
Virgin Australia	595,408	14.7%	
Total	4,054,845	100%	

^{*} Citilink recommenced services from 29 July 2023

Based on published schedules, all incumbent carriers on the Indonesia route plan to grow services in the 12 months to September 2024. While Jetstar's published schedule reflects a ten per cent increase in seat capacity, its share of total seats between Australia and Indonesia falls by around six per cent as carriers continue to add capacity to meet anticipated growing consumer demand.

Carrier	Seats to/from Indonesia Oct23-	% of Seats to/from Indonesia	% Variance (Oct23-Sep24 vs.	
	Sep24	Oct23-Sep24	Oct22-Sep23)	
Batik Air Indonesia	386,832	7.5%	55%	
Garuda Indonesia	461,125	9%	85%	
Indonesia AirAsia	526,680	10.3%	42%	
Citilink	108,720	2.1%	N/A	
Batik Air Malaysia	447,327	8.7%	21%	
Jetstar	1,937,426	37.8%	10%	
Qantas Airways	558,050	10.9%	21%	
Virgin Australia	701,888	13.7%	18%	
Total	5,128,048	100%	26%	

In addition to these services, established third country carriers, such as Singapore Airlines, serve the indirect market.

(c) the likely impact on consumers of the proposed allocation, including on costs of airfares, customer choice, product differentiation, stimulation of innovation by incumbent carriers, and frequency of service

Jetstar will continue to provide increased choice and frequency of service and innovative, product differentiation on the route.

Impact on the cost of airfares

Jetstar has been democratising air travel for 19 years, providing millions of passengers with access to low fares. Jetstar's business model is based on price leadership, enabling people to fly more often or for the first time.

Jetstar is committed to offering sustainable low and competitively priced fares on services between Australia and Indonesia. Based on average fare data, Jetstar's fares are significantly lower – between 14 and 68 per cent less – than its competitors. 11

During the forward looking 180 day period analysed by Infare commencing 31 December 2023, Jetstar's average fares are 37 per cent and 32 per cent lower than Virgin Australia's Melbourne-Denpasar and Adelaide-Denpasar services. For services between Perth and Denpasar, Jetstar's airfares are comparable to its competitors.

Jetstar's low fares are supported by the *Jetstar Price Beat Guarantee*, which underlines the airline's commitment to offering passengers the lowest possible internet fares. If travellers find a fare with

¹¹ Infare – comparison based on a forward looking 180 day period from 31 December 2023

another airline or a Jetstar flight on an eligible third party website that is cheaper than on jetstar.com, Jetstar will beat it by 10 per cent. 12

By actively stimulating the market with lower airfares, Jetstar has the highest seat factors of the carriers operating on the Indonesia route. For the twelve months to September 2023, ¹³ Jetstar recorded an average seat utilisation of 90 per cent, which is consistent with Jetstar's seat utilisation pre-COVID. Virgin Australia's seat factors sit below the average for carriers on the Indonesia route, indicating a less efficient utilisation of capacity.

Carrier	2018	2019	Oct22-Sep23	
Batik Air Indonesia	55%	61%	60%	
Citilink Indonesia		45%		
Garuda Indonesia	76%	75%	69%	
Indonesia AirAsia	74%	84%	84%	
Jetstar	91%	92%	90%	
Qantas Airways	87%	89%	87%	
Virgin Australia	80%	81%	83%	
Total	82%	84%	84%	

Jetstar is committed to offering consumers choice when they travel. Jetstar's fare structure is designed to give consumers value for money by allowing them to choose and opt into various products. These are detailed in the table below.

	Starter	Flex Bundle	Plus Bundle	Max Bundle	Business Starter	Business Max Bundle
Seat selection	+	Standard selection or upfront where availableup	Standard selection	Up-front and extra legroom where available	~	~
Carry-on baggage	7 kg	14kg	7 kg	7 _{kg}	14kg	14kg
Checked baggage ²	+	+	20 kg	30 kg	30 kg	30 kg
Food and drink	+	Meal or in-flight voucher on selected flights ¹	Meal or in-flight voucher on selected flights ³	Meal or in-flight voucher on selected flights ¹	~	~
In-flight entertainment Available on 787 Dreamliner only	+	+	+	+	✓	~
Comfort pack	×	×	×	×	✓	~
Free change on day of flight* Included in the fare or bundle price	×	~	×	×	×	×
No fees for date, time or name changes ⁵	×	~	✓	✓	✓	✓
Refundable ⁶	×	Issued as credit voucher	×	Issued as a credit voucher	×	Issued as a credit voucher
Frequent flyer points	Oantas Points can be earned on domestic NZ flights ^a	Oantas Points can be earned on NZ domestic flights?	Earn layalty points ² or a Jotstar Flight Rowards Voucher ⁸	Earn loyalty points ² or a Jutstar Flight Rowards Voucher ⁸	×	Earn layalty points ² or a Jetstar Hight Rewards Voucher ⁸
Lounge access?	×	×	×	×	×	✓ "



¹² https://www.jetstar.com/au/en/price-beat-guarantee

 $^{^{13}}$ Bureau of Infrastructure, Transport and Regional Economics, International airline activity.

This provides greater choice to Jetstar's domestic and international consumers, allowing them to only pay for services which they value and need, stimulate more demand, and drive efficiencies at airports to support the customer service functions around the Jetstar network.

In addition to the above, Jetstar offers various ancillary products and services that further enable consumers to customise their travel experience.

Qantas Loyalty members can redeem their Qantas Frequent Flyer points for Jetstar 'classic reward' seats, or use 'points plus pay' to purchase flights using a combination of cash and points, providing consumers with multiple options to secure seats on Jetstar flights. Qantas lounge facilities are included under some Jetstar fares (Business Max Bundles) and lounge access is available to Jetstar customers on any fare for eligible Qantas Frequent Flyer tiered and Qantas Club members.

Jetstar provides hotel options for consumers during the booking process based on travel dates and destination, which is a key point of differentiation from Virgin Australia and desirable for a predominantly leisure market such as Indonesia. The product range of Jetstar Holidays includes packaged holidays, hotels, car hire, activities and other travel services. Jetstar provides over 100 holiday packages and over 5,000 property options for Denpasar (Bali).

Jetstar offers a wide range of payment options to customers, including Multi-Currency Pricing (customer can choose from 16 different currencies), Points Plus Pay, Afterpay, Alipay, and WeChat Pay that are not available with Virgin Australia.

Increased choice and frequency of service

Jetstar's plans to introduce additional services between Australia and Indonesia would offer consumers increased choice and frequency of service. The schedule is focused on servicing and growing traffic, providing additional options to travellers at convenient timings.

Jetstar's proposed Cairns-Melbourne-Denpasar service provides a new daily option for consumers. Currently, Jetstar is the only airline operating direct services between Cairns and Denpasar, with three flights per week in the Northern Winter 2023 scheduling season.

In addition to the direct service, consumers are able to combine two (or three) sectors in the one booking to a destination that is not served by a point-to-point flight (i.e. sum of sector pricing). In Calendar Year 2023, the most popular options for passengers using sum of sectors to travel between Cairns and Denpasar was via Sydney and Melbourne. ¹⁴

Distinct from the sum of sector pricing, Jetstar's proposed Cairns-Melbourne-Denpasar service provides a more efficient option for passengers that choose to travel indirectly. The flight has a shorter connection time than is required for other connections as the flights depart and arrive in the same international terminal at the Melbourne transit port. It is a seamless experience for consumers as passengers and their baggage are checked through to the final destination.

The proposed service would be Jetstar's fourth daily flight operating between Melbourne and Denpasar, providing another overnight option for consumers and enhancing operational efficiency through back of the clock flying. With Victoria representing the largest share of total traffic on the Indonesia route, Melbourne is the ideal port to be served.

Jetstar's proposed Adelaide-Perth-Denpasar services are scheduled to operate three times per week on complimentary days (i.e. Tuesday, Thursday, Saturday) to supplement the existing direct Adelaide-Denpasar services operated by Jetstar, Virgin Australia and Batik Air Indonesia.

¹⁴ Internal sum of sector data, includes customers reaccommodated during disruptions

The proposed service provides an alternative option for consumers, with an afternoon departure from Adelaide (1540) and late morning departure from Denpasar (1115). These daylight timings are attractive to consumers, particularly when compared to Virgin Australia's proposed schedule (1720 ex-Adelaide and 0145 ex-Denpasar).

Jetstar currently operates three flights per day between Perth and Denpasar and the additional service would operate at similar times (1900 ex-Perth and 1115 ex-Denpasar). As noted above, daylight timings are desirable and preferable to Virgin Australia's proposal.

The proposed additional Jetstar services offer same-day connectivity to 14 destinations, including:

- Twelve domestic points (Adelaide, Avalon, Ballina, Brisbane, Canberra, Gold Coast, Hobart, Launceston, Maroochydore, Melbourne, Newcastle and Sydney); and
- Two international points (Auckland and Honolulu).

The services also have same day connectivity (either to/from) to Qantas flights to the following destinations:

- 27 domestic points (Adelaide, Albury, Alice Springs, Brisbane, Broome, Burnie, Cairns, Canberra, Coffs Harbour, Darwin, Devonport, Geraldton, Gold Coast, Hobart, Kalgoorlie, Karratha, Launceston, Leamonth, Maroochydore, Melbourne, Mildura, Newman, Paraburdoo, Perth, Port Hedland, Sydney, Wagga Wagga); and
- Nine international points (Auckland, Christchurch, Dallas, London, Los Angeles, Paris, Queenstown, Tokyo, Wellington).

Product differentiation

Jetstar's business model is focused on providing sustainable low fares by maintaining a low cost base and it has invested to improve customer experiences and provide more choice.

Jetstar will operate the proposed Cairns-Melbourne-Denpasar and Adelaide-Perth-Denpasar services using new Airbus A321LR aircraft, which significantly enhance the inflight experience for customers. These aircraft have a range of benefits including wider seats, larger overhead storage lockers, in-seat USB power and in-flight digital streaming technology, which is an Australian first for a low fares airline.

Further details on these cabin features are provided below: 15

- Jetstar Entertainment+, Jetstar's in-flight entertainment system is available to buy on board and stream on customers' devices (JQ flights only). It offers a variety of content, from new-release movies and TV, to kids' shows, podcasts and games.
- Award-winning ergonomic Recaro seats with tapered arm rests for greater living space.
- Extra-large overhead bins with 40 per cent more space, providing passengers with more room to stow bags overhead.
- Flip-down smartphone and tablet cradles and in-seat USB power to keep personal devices charged.
- Colour LED lighting that adjusts to the different stages of flight, which provides greater levels of passenger comfort and supports transition through various stages of flight.

The use of these new, more efficient aircraft is aligned with Jetstar's focus on providing sustainable low fares. The A321LRs is the most fuel-efficient jet aircraft per seat in Australia, delivering a unit cost advantage compared to new narrowbody aircraft being introduced by Australian competitors. The

¹⁵ https://www.jetstar.com/au/en/inspiration/articles/airbus-a321neo-lr-aircraft-features

A321LR is 15 per cent more fuel efficient than Jetstar's current fleet of A320 aircraft, 50 per cent quieter and can fly up to 1200kms further – making it the lowest emissions aircraft in the Jetstar fleet.¹⁶

The longer range, more fuel efficient, quieter Jetstar A321LR will seat 232 passengers in a single class cabin. As part of Jetstar's product on this aircraft, customers have a number of options to purchase, such as checked and carry on luggage allowances, seats (including extra leg room and up front seating), meals, snacks and beverages, entertainment and comfort packs (including a blanket and amenity kit).

Stimulation of innovation

Since its inception, Jetstar has taken a continuous approach to innovation in keeping with its desire to offer consumers maximum choice and flexibility. Today, Jetstar offers an enhanced user experience for bundle selection, new products to provide consumers with greater flexibility (i.e. FareCredit) and a dynamic seat map with zoned pricing.

Released in Financial Year 2022, Jetstar's FareCredit is a world-first product whereby customers can cancel their booking and receive a voucher for the value of their flight. It applies to fares that are non-refundable for customer change of mind and provides enhanced customer choice. This product was featured in a report by CarTrawler in 2023 as one of the 'eight new ideas by airlines all over the globe'.

A key feature uniquely offered by Jetstar and one that provides added value to customers is Club Jetstar, which is a subscription program that provides various discounts to members. Club Jetstar has around 365,000 members, including around 213,000 new members who joined in 2023. In 2023, Club Jetstar members saved a combined total of \$32 million in airfares, seat selection and baggage fees.¹⁷

(d) the desirability of fostering own aircraft operations by Australian carriers over code share or other joint international air services involving the marketing, by an Australian carrier, of seats on flights operated by foreign carriers

The proposal is for Jetstar to utilise the capacity for own aircraft operations between Australia and Indonesia.

(e) the benefits presented by allocating the capacity to a given applicant over other competing applicants, having regard to any commercial arrangements that may be in place with other carriers

As noted in the sections above, there are a number of benefits associated with allocating the capacity to Jetstar over Virgin Australia. These include:

- Additional capacity to/from the largest market in Australia (Victoria) to Indonesia;
- Additional options for consumers travelling from Adelaide/Perth to Denpasar at convenient daylight timings;
- More efficient utilisation of capacity, stimulated by lower airfares;
- Offering a large range of possible itinerary options through onward services on Jetstar and Qantas' extensive domestic, regional and international network;
- Greater choice in product offering, including more bundle options for consumers (e.g. Jetstar provides five different checked baggage allowance options compared to a single option provided by Virgin Australia); and
- Packages and hotel options available to consumers by Jetstar Holidays, suited to a predominantly leisure market such as Denpasar.

¹⁶ https://newsroom.jetstar.com/jetstars-first-a321-lr-touches-down-in-australia/

¹⁷ https://www.australianfrequentflyer.com.au/club-jetstar/

Tourism and Trade Criteria

(h) the level of promotion, market development and investment proposed by each of the applicants

Jetstar will promote the additional Indonesia services on an ongoing basis via network-wide and tactical route-specific campaigns.

Through consistent destination promotion, Jetstar has been able to improve passenger numbers and support tourism between the two countries. Jetstar provides sale fares as part of regular promotional marketing campaigns to help stimulate the market. Further, Jetstar offers more economy price points than competitor airlines, which are more regularly available than sale fares and are highly competitive.

For the outbound market, Jetstar continues to be the most active Australian marketing supporter of Indonesia. Over a twelve month period this includes:

- Approximately 15 flights/holiday packages sale events per year, including Denpasar fares. Sales
 campaigns include a mix of marketing channels featuring geo-targeted, market-specific marketing
 assets. Examples of previous assets include:
 - <u>Un-Bali-vable Fare Frenzy</u> (EDM);
 - Bali Breaks Holiday packages (EDM);
 - Christmas Sale (TV);
 - Christmas Sale (Digital Display); and
 - Fare Play Sale (Social).
- Around 15 EDMs to active Jetmail subscribers (audience of 2.5-3 million for each send) and Club Jetstar members;
- An estimated annual spend of approximately \$800k in paid media promoting Denpasar as a destination, plus low fares/package deals to get there; and
- Monthly content throughout the year on Jetstar channels, including Facebook (773k followers), Instagram (193k followers) and TikTok (1.4 million likes).

(i) route service possibilities to and from points beyond Australian or foreign gateways

Jetstar offers passengers an extensive network within Australia and beyond the Australian gateways as well as links to Qantas Group domestic and international services.

Jetstar gives inbound passengers a large range of possible itinerary options through onward services on its domestic network to 22 destinations in Australia and through its interline and code share with Qantas to 97 destinations globally, including 64 points in Australia. This will provide scope for increased domestic dispersal of visitors from Indonesia, with benefits for Australian tourism.

Denpasar is increasingly becoming a hub for Jetstar with connectivity beyond Denpasar to Singapore on Jetstar Asia and interline agreements with up to 13 partner airlines. Jetstar has a code share agreement with KLM Royal Dutch Airlines, which includes code sharing on flights operated by Jetstar to Indonesia.

(j) the availability of frequent, low cost, reliable air freight movements for Australian importers and exporters

Two-way trade between Australia and Indonesia has recovered since the pandemic and is now at record levels. ¹⁸ The Indonesia-Australia Comprehensive Economic Partnership Agreement has supported trade facilitation between the two countries.

¹⁸ https://www.pm.gov.au/media/closer-cooperation-indonesia-stable-and-prosperous-future

Jetstar's new Airbus A321LR aircraft would have the ability to uplift 1,100 kilograms of freight per flight for services between Melbourne and Denpasar. Greater uplift would be possible on Perth-Denpasar services.

As part of the Qantas Group, Jetstar can offer its freight customers access to an extensive international and domestic network. In conjunction with Qantas Freight, Australia's largest independent air freight services business, Jetstar can provide access to better distribution capabilities and freight management expertise to consumers compared to other carriers.

ATTACHMENT 2

Flight	Eff Date	Dis Date	Freq	Dep	DepT	Arr	ArrT	Subfleet
JQ33	01/05/24	05/10/24	1234567	CNS	1145	MEL	1515	32Q
JQ33	01/05/24	05/10/24	1234567	MEL	1645	DPS	2055	32Q
JQ33	06/10/24	26/10/24	1234567	CNS	1145	MEL	1615	32Q
JQ33	06/10/24	26/10/24	1234567	MEL	1745	DPS	2055	32Q
JQ34	01/05/24	04/10/24	1234567	DPS	2210	MEL	545	32Q
JQ34	01/05/24	05/10/24	1234567	MEL	725	CNS	1045	32Q
JQ34	05/10/24	26/10/24	1234567	DPS	2210	MEL	645	32Q
JQ34	06/10/24	26/10/24	1234567	MEL	825	CNS	1045	32Q
JQ108	01/08/24	05/10/24	.2.4.6.	ADL	1540	PER	1735	32Q
JQ108	01/08/24	05/10/24	.2.4.6.	PER	1900	DPS	2240	32Q
JQ108	08/10/24	26/10/24	.2.4.6.	ADL	1540	PER	1635	32Q
JQ108	08/10/24	26/10/24	.2.4.6.	PER	1800	DPS	2140	32Q
JQ111	01/08/24	05/10/24	.2.4.6.	DPS	1115	PER	1500	32Q
JQ111	01/08/24	05/10/24	.2.4.6.	PER	1625	ADL	2045	32Q
JQ111	08/10/24	26/10/24	.2.4.6.	DPS	1115	PER	1500	32Q
JQ111	08/10/24	26/10/24	.2.4.6.	PER	1625	ADL	2145	32Q