

1 **Analysis of Airports Served by Ultra Low-Cost Carriers**

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39 **Data Availability Statement**

40 The statistical data are available for sharing at:

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1 **ABSTRACT**

2 Recently the domestic aviation industry has been influenced by rapidly growing ultra low-cost
3 carriers (ULCCs). The pattern of airport markets served by ULCCs is incongruous with legacy
4 carriers and low-cost airlines alike. Existing literature, however, is limited for North American
5 ULCCs, and prior research has only recently begun to identify them separately from mainstream
6 low-cost carriers. This paper seeks to understand the market factors that influence ULCC service
7 decisions. The relationship between ULCC operations and airport market factors was analyzed
8 using three methods: mapping 2019 flight data for four ULCCs combined, two regression
9 analyses to evaluate variables, and three case studies examining distinct scenarios through
10 interviews with airport managers. Enplanement data were assembled for every domestic airport
11 offering scheduled service in 2019. Independent variables were collected for each Part 139
12 airport. The first model estimated an OLS regression model to analyze ULCC enplanements. The
13 second model estimated a binary logistic equation for presence of ULCC service. Case studies
14 for Bellingham, Waco, and Lincoln were selected using compelling airport factors and relevant
15 ULCC experience. Maps of ULCC enplanements revealed concentrations of operations on the
16 East Coast. Both regression analyses showed strong relationships between population and non-
17 ULCC enplanements (two measures of airport market size) and ULCC operations. A significant
18 relationship also exists between tourism and enplanements. In the logit model, distance and
19 competition variables were associated with ULCC presence. Case studies emphasized the
20 importance of airport fees and competition in ULCC preferences, although aeronautical costs
21 were generally not significant in the regressions.

1 INTRODUCTION

2 The United States' domestic commercial aviation market has continued to evolve and expand
3 since federal deregulation in 1978, when air carriers were awarded freedom to pursue new
4 routes, expand operations to new aviation markets, and charge competitive fares for flights (1).
5 In the twenty-first century, a new class of airlines has grown quickly to capture 9% of domestic
6 market share by available seat miles (2). Ultra low-cost carriers (ULCCs) create a new level in
7 the hierarchy of U.S. airlines by undercutting the low-cost model to even greater depths.
8 Influenced by the success of European low-cost carriers, the primary objective of American
9 ULCCs is to provide mostly short- and medium-length, direct, point-to-point flights that do not
10 depend on connecting passengers at hubs, with ancillary fees assessed for most amenities. Four
11 ULCCs implemented this revenue scheme to varying degrees within the United States in 2019:
12 Allegiant Air, Frontier Airlines, Spirit Airlines, and Sun Country Airlines.

13 The first two decades of the 2000s witnessed consistent growth in domestic air travel.
14 Much of the expansion of the domestic aviation sector in this time period was a result of the
15 proliferation of ULCCs, which have consistently grown faster in terms of flights and
16 enplanements than their legacy and low-cost rivals (3). One causal factor for this success may be
17 the aggressive pursuit by ULCCs of new aviation markets with negligible existing commercial
18 service. In contrast, legacy carriers have for decades relied on a model of hub-and-spoke
19 connections across the United States, consolidating operations to hub airports with high levels of
20 service while reaching nearly every major population center at primary airports (4). The rapid
21 growth of low-cost carrier Southwest Airlines in the 1980s and 1990s relied on attracting a loyal
22 cohort of flyers to secondary airports with lower fees, better reliability, and room to expand
23 operations (5). ULCCs do not seem to fit entirely into either one of these business models. A
24 brief examination of the domestic markets served by ULCCs reveals a collection of major
25 primary hubs, secondary metropolitan airports, tourist destinations, as well as rural and
26 underserved areas with spotty commercial aviation histories. This incongruous pattern of market
27 selection defies the norms of the U.S. airline industry. Existing research has not fully examined
28 this aspect of ULCCs or rationalized why many rural, disconnected, and small airports receive
29 ULCC air service yet others do not. While studies have extensively reviewed domestic and
30 European low-cost carriers, analyses of American ULCCs and their criteria for airport selection
31 are few.

32 This paper will analyze the domestic aviation markets served by ULCCs and determine
33 which market factors are the most conducive for enabling this specialized sector of commercial
34 air service. The outcomes document ULCC business priorities, analyze the preferences and
35 criteria that promote the airport-ULCC relationship, and provide context to their significance,
36 which can each be used to guide future development at U.S airports.

37 LITERATURE REVIEW

38 The term "low-cost carrier" (LCC) refers generally to a spectrum of airlines, including ULCCs,
39 that offer passenger travel at bare minimum fares, often with added charges for ancillary services
40 such as seat selection and baggage, but sometimes bundled with other products and services such
41 as hotel and rental car bookings, all while pursuing strategies to reduce operational costs. There
42 is agreement in the literature that LCCs tend to: rely on single aircraft types (6), prefer shorter
43 point-to-point routes(7), and limit in-flight perks for passengers (8). Recently, a few reports have
44 recognized ULCCs as a separate category, though the term seems to be more prevalent in
45 literature reviewing domestic airlines than those examining European carriers. In a 2013 ACRP
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1 Report, Parella (9) distinguished the ULCC business model using Allegiant and Spirit as
2 examples and highlighting additional commonalities such as flight frequencies daily or less
3 dictated by aircraft availability, minimal partnering with other airlines, and often not signatories
4 to airport use/lease agreements to keep overhead low and maintain flexibility to enter and exit
5 markets. The Oliver Wyman *Airline Economic Analysis 2018-2019 Edition* (2) expanded the
6 number of airline categories from two (Network and Value) to three by splitting an Ultra Low-
7 Cost group from the Value class and placing Allegiant, Frontier, and Spirit in the new category.
8 This was based on the three ULCCs having the lowest domestic revenues per available seat mile
9 and lowest cost per available seat mile, compared with Alaska, JetBlue, Hawaiian, and
10 Southwest Airlines, which make up their Value category. Spirit, for example, achieves low unit
11 costs from high aircraft utilization, simplified operations, and minimal hub-and-spoke
12 inefficiencies compared to other carriers (10). The ULCC category also stood out by getting 25-
13 42% of their revenues from baggage, reservation change, and miscellaneous fees, as compared
14 with 7-16% for the Value Category (2). The 2020-2021 Oliver Wyman *Airline Economic*
15 *Analysis* confirmed Sun Country Airlines as a fourth member of the ULCCs, and noted that the
16 category produced the best operating results of any category during the difficult second and third
17 quarters of 2020, and was in fact the only passenger airline category to gain employment during
18 2020 (11).

19 Many studies of low-cost airlines have focused on the success of Southwest Airlines.
20 While Southwest offers a minimum level of in-flight perks, offers cheap fares for short-haul
21 service, and collects some ancillary revenues from passengers, the overall business strategy is to
22 build a robust brand identity as much as it has been to utilize a purely low-cost model (7).
23 Southwest has reduced service to secondary airport markets in recent years, cutting 10% of
24 capacity to its core secondary markets between 2007 and 2012 while growing at major hubs (12).
25 Secondary airports are generally considered to include the other commercial service airports in a
26 metropolitan region that are not major hubs or gateways. As of 2015 they operated to many more
27 hub or main airports (44%) than to secondary airports (24%) (13). In contrast, Allegiant routed
28 only 4% of its service through main airports while 30% of seats were out of secondary airports
29 (13) and charged ancillary fees for every aspect of the flight (14). Southwest maintains a cost per
30 available seat mile that is higher and a daily aircraft utilization that is lower than Spirit (10).
31 Thus, given the criteria that mark carriers as ULCCs, Southwest cannot be considered in this
32 category.

33 The aviation industry in Europe provides important lessons for the U.S. market because
34 of its array of LCCs and their impacts on airports across the continent. Legacy carriers in Europe
35 have shrunk drastically in the last two decades due to intense competition from LCCs at hub
36 airports (15). Not only are LCCs poaching travelers from mainline carriers, they are also
37 gathering them from greater distances. European LCCs tend to increase the passenger catchment
38 area of airports to a greater degree than legacy or regional carriers offering the same service (8).
39 Dobruszkes, Givoni, and Vowles (13) established that LCCs often operate with a heterogeneous
40 pairing of flight origins and destinations. Airports such as Charleroi in Belgium serve mostly as
41 “departure” airports (for the first flight of a round trip, presumably from a passenger’s home
42 region) to destinations across Europe, while others, especially in southern Europe, tend to be
43 “arrival” airports. This observation acknowledges the importance of tourism in the context of
44 low-cost carriers’ airport choices as well as the fundamentally different purposes of airport
45 markets for LCCs.

1 Tourism is especially important to LCCs in part because tourists place a lower value on
2 the loyalty rewards and amenities of legacy airlines (16). The main factor considered when
3 planning a leisure trip is cost, and therefore LCCs can generate interest in a route through low
4 fares alone (17). Leisure travelers spend more time searching for lower fares before booking and
5 are more likely to book as the departure date gets closer, meaning that LCC fares stand out (18).
6 Dennis (8) found that LCCs take advantage of suppressed demand for travel by undercutting the
7 fares of legacy carriers to expand existing markets, or to open new ones entirely. There is
8 agreement in the literature that the conventional thinking in regards to European LCC's airport
9 choice strategy has not painted a complete picture. It has long been assumed that LCCs' growth
10 in Europe is primarily driven by warm-weather tourist destinations routes, which have untapped
11 potential to expand catchment areas and attract tourists primarily. However, Dobruszkes (17)
12 found that LCCs also compete directly with legacy airlines on existing routes, while Davison and
13 Ryley (19) noted the attraction of LCC passengers to colder-weather cultural destinations such as
14 Prague and Berlin. LCCs serve many business travelers on high-density routes as long as the
15 flight schedule is frequent, and to an extent can exploit a classic domain of legacy airlines (8).
16 This is especially true when there are factors that constrain demand for legacy carriers, such as
17 high fares close to departure or many sold-out flights (20). Pels (21) explored the potential for
18 LCCs to compete with legacy carriers for long-haul markets. In another paper, Pels (22)
19 suggested that the true purposes of aviation travel for leisure is not monolithic; many book
20 leisure trips to see family and friends in populated areas across the country rather than escape to
21 a vacation destination only. While the airport choice of LCCs can be broadly categorized as
22 leaning towards major city catchment areas and tourist destinations that are urban or coastal (17),
23 these findings underscore that LCC and ULCC service may not be as heavily oriented towards
24 secondary or tourist airports as commonly assumed.

25 A critical discussion of airport choice involves studies of market leakage. Distance, flight
26 frequency, and cost have been proven as relevant factors influencing leakage at U.S. airports (23,
27 24). Fu and Kim (25) found a positive feedback loop between the overall passenger
28 enplanements of an airport and its ability to retain passengers to continue growth. Intervention
29 measures may be required to break the cycle of leakage from smaller or rural airports. LCCs are
30 uniquely positioned to conquer these obstacles due to their efficiency and ability to quickly
31 adjust service. Parella (9) proved that LCCs are able to overcome distance and competition
32 disadvantages for smaller airports in multi-airport regions by providing cheap point to point
33 service to leisure destinations. The experience of smaller and regional airports in Europe has
34 shown that LCCs seek to monopolize aviation markets and bargain to keep costs low, often
35 threatening to remove service quickly if conditions are not being met (26). An analysis of airport
36 pricing found that LCCs are disproportionately impacted by increases to airport user fees as
37 opposed to other airline models (27). Elian and Cook (10) found that Spirit Airlines rigidly
38 sought markets that could demand at least 200 passengers per day each way, and an earnings
39 before interest margin of 24% to 26%. A critical portion of the monopolization strategy is to
40 reach the new market first. Research shows that the first-mover advantage stymies potential
41 competition (26) and saves costs by establishing long-term service contracts with airports(7).
42 Further, survey data shows that existing LCC competition at an airport disincentivizes other
43 airlines considering the same market (28). The presence of a legacy carrier at an airport generally
44 does not deter LCC entry because legacy fares are usually higher.

45 Airports generally covet LCC service for several reasons. The shift toward the hub-and-
46 spoke model of the legacy carriers in the U.S. created so-called fortress hubs; a market in which

1 a single airline controls 70% or more of the passenger share and travelers often face fare
2 premiums (1). In response, ULCC entry to the market can trigger a drop in fares. Bachwich and
3 Wittman (6) confirmed that North American ULCCs induce a 20% drop in fares on all carriers
4 operating to an airport following their entry into the market, compared to an 8% reduction for
5 new LCCs. This may explain why the route network of Spirit Airlines shares a 60% overlap with
6 American Airlines, including a focus on American's largest hub at Dallas-Fort Worth (10). In
7 expanding to accommodate new service, the fixed costs of new airport infrastructure can be high
8 when the airport is congested, but at airports with spare capacity, the marginal costs of
9 accommodating additional passengers are relatively low, especially compared with marginal
10 airport revenues (16). In addition to the income earned by the airport from aeronautical
11 operations such as landing fees, taxes, and fueling services, non-aeronautical revenues such as
12 parking charges, retail sales, and food services are critical to the financial success of an airport.
13 LCCs have unique traits that provide further economic advantages. As LCC passengers are
14 frequently leisure travelers, they tend to arrive earlier than those flying for business, especially
15 because LCCs charge premiums for food and other in-flight goods. Francis, Fidato, and
16 Humphreys (16) found that LCC passengers on average spend between one to two hours in the
17 terminal prior to boarding. Critically, expanding non-aeronautical revenue sources allows
18 airports to reduce airport fees, a key enabler of low-cost carrier operations.

19 Overall, the reviewed literature establishes a base of knowledge surrounding European
20 low-cost carriers, with limited comparison to North American carriers and without correlating
21 service to airport factors or geography in the same vein as Dobruszkes (17). Compelling
22 arguments are created for further investigation such as exploring how ULCCs have been able to
23 rapidly expand throughout the United States and which airport choice factors have enabled their
24 success. ULCCs capture a greater share of the aviation market every year, and it is critical that
25 researchers, airport managers, government agencies, airport planning consultants, and regional
26 economic development organizations understand how operational decisions are made by such
27 airlines.

28 29 **METHODS**

30 The focus of this analysis is on airports served by ULCCs and the region, potential customers,
31 and competing airports around them, rather than on origin-destination (O-D) flight-market pairs,
32 and is motivated by several phenomena. First, ULCCs have gained recognition by renewing
33 scheduled flights at many smaller airports that lacked commercial service (14). Second, and
34 conversely, their operations at larger airports and airports not traditionally seen as tourist markets
35 have received insufficient attention (6). Third, in multi-airport regions, "the choice of which
36 airport, among several, to serve may be the most significant" decision that ULCCs make once
37 they have decided to operate in the region, given their "relatively less complex business plans"
38 (9). Fourth, airlines make considerable investments in employees, leases, local advertising,
39 regulatory costs, and transaction costs in general, when establishing service at a previously
40 unserved airport (16). Fifth, cost is recognized as a fundamental consideration in ULCC strategy,
41 but evaluating airport markets on an equal playing field is difficult because of local conditions
42 unique to each airport market, such as labor costs, aeronautical fee agreements, or air service
43 incentive programs. (16). The authors acknowledge that ULCC decisions to operate from a
44 particular airport are intertwined with the decision of which O-D markets to serve from the
45 airport, and a modeling analysis that evaluates airports on an individual basis may not fully
46 capture the complexities of the origin and destination relationship.

1 To answer the primary research question, the first step in the analysis was to establish a
2 baseline of data for the current operations of the four ULCCs. Using domestic flight information
3 from 2019, a roster of all airports in the United States served by ULCCs was created. We then
4 hypothesized a list of demographic and aviation-related variables that may be important to
5 ULCCs and aid in explaining service patterns. Linear and logistic multiple regression models
6 were estimated using the statistical program SPSS to analyze the relationship and significance of
7 independent variables with the presence and volume of ULCC service. A Heckman selection
8 modeling approach was also tested, which involved estimation of a joint probit model of ULCC
9 service presence and a linear regression model of ULCC enplanements. This statistical modeling
10 approach adjusts the coefficients in the model of ULCC enplanements to test for and remove
11 potential bias stemming from the fact that those airports without ULCC service are not included
12 in the enplanements model at all (29). The Heckman approach yielded similar results to the
13 independent logit and OLS models presented in this paper.

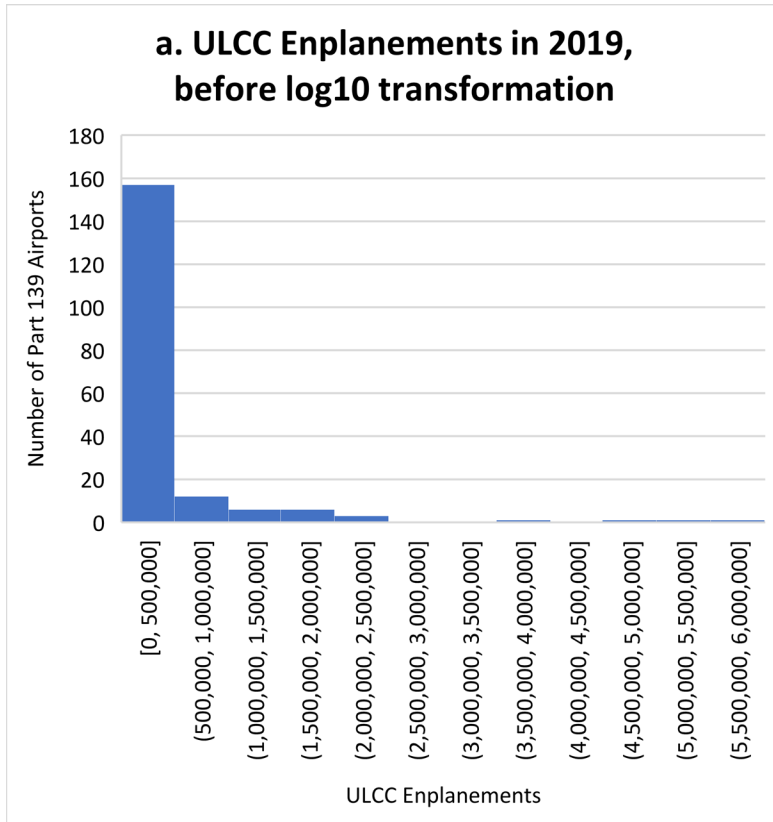
14 Finally, three case studies of airport markets were examined qualitatively through
15 interviews with airport managers to capture a more detailed understanding of ULCC business
16 characteristics and any special circumstances unaccounted for by quantitative analysis.
17

18 **Dependent Variables – Data Sources, Pre-processing, and Sample Size**

19 Data for non-stop flight segments for calendar year 2019 were downloaded for all U.S. carriers
20 from the Bureau of Transportation Statistics T-100 domestic segment table (30). The data were
21 trimmed to leave only flights by the four identified ULCCs. Next, ULCC flights of service class
22 “L – Non-scheduled civilian passenger/cargo service” including charter and non-revenue flights
23 were removed, leaving service class “F – Scheduled civilian passenger/cargo service” remaining.
24 The list of Part 139-certified airports in 2019 was acquired from the Federal Aviation
25 Administration (31). Part 139-certified airports were selected because such airports must meet
26 the stipulated infrastructure and safety criteria in order to handle scheduled commercial flights.
27 Therefore, any airport currently or readily able to handle ULCC service would need to be Part
28 139-certified. Finally, for each Part 139 airport, enplanements were summed for all four
29 identified ULCCs.

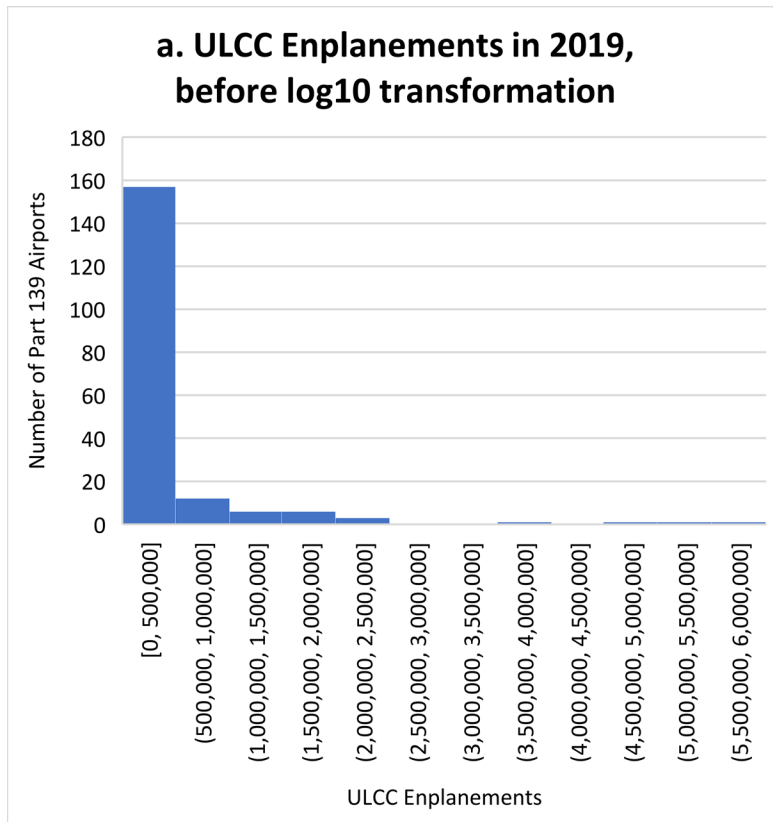
30 For the binary logit regression, the dependent variable was the presence of ULCC service
31 at an airport. The logit model assesses what factors are statistically associated with the presence
32 or absence of ULCCs at an airport. For the ordinary least squares (OLS) regression, the
33 dependent variable is the enplaned ULCC passengers transformed by taking the logarithm base
34 10 to normalize the highly and positively skewed values and enable a better fit to a linear model
35 (**Figure 1**). The OLS model estimates what factors are statistically associated with higher or
36 lower ULCC enplanements at airports that have ULCC service.

37 Based on an analysis of outliers, we removed observations for airports in Alaska, Hawaii,
38 Puerto Rico, and the U.S. Virgin Islands due to problematic catchment areas caused by sparse
39 road data, missing airport and demographic data, or both. Branson, MO (BKG) was removed
40 from the statistical analysis due to internal inconsistencies in the T-100 data. The final sample
41 sizes were n=471 for the logit regression (using all Part 139 airports in the lower 48 states with
42 and without ULCC service) and n=178 for the OLS regression (using only those with ULCC
43 service).
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Figure 1a Histogram of ULCC enplanements for the 178 Part 139 airports with ULCC service in 2019.



1
2 **Figure 1b Histogram of ULCC enplanements for the 178 Part 139 airports with ULCC**
3 **service in 2019, after log₁₀ transformation.**
4

5
6 **Independent Variables**

7 The list of independent variables was informed by previous research on ULCC market factors.
8 The independent variables were chosen to represent characteristics of the airport’s services,
9 costs, and location, and the airport’s surrounding market area. Other independent variables were
10 considered but were eliminated because of multicollinearity or data unavailability or
11 incompleteness.

12 Driving distance catchment areas and distance variables were calculated using the
13 ArcGIS Online network analysis tool. The catchment areas were generated using a 70-mile
14 driving distance based on the original FAA criteria for Essential Air Service (EAS), which has
15 been used by Grubestic et al. (32) among others. While EAS community eligibility criteria were
16 updated in 2015 to a complicated set of criteria involving 210 miles or 175 driving miles from
17 medium- or large-hub airports and 40 miles from small-hub airports, this could not provide a
18 consistent standard for all Part 139 airports. The 70-mile standard is consistent with research by
19 Fuellhart (33), who used a 75-mile buffer to define the “core” market for a study on airport
20 leakage in the Harrisburg, PA multi-airport region, and Yirgu, Kim, and Ryerson (23), who
21 found that 76% of passengers traveled less than 80 miles to reach their chosen airport in the US
22 Midwest. The 70-mile standard is also compatible with findings from Dennis (8) and Lieshout
23 (34) that while LCCs draw some passengers from great distances, passenger access time usually
24 remains under two hours, and that core markets and rates of distance decay vary greatly due to
25 factors such as airport size, competition, services offered, and geographic setting.

1 • Log₁₀ of Non-ULCC enplanements: Using the T-100 data (30), ULCC enplanements
2 were subtracted from total enplanements to obtain the non-ULCC enplanements. Non-ULCC
3 enplanements were also high skewed and thus log-transformed. Given that there were 85 Part
4 139 airports serviced only by ULCCs, which means their non-ULCC enplanements were 0, and
5 given that log₁₀ of 0 is undefined, we substituted a value of 0.0, which is the log₁₀ value if there
6 were exactly one passenger enplaned annually instead of zero, which is a very close
7 approximation.

8 Both market size variables are hypothesized to have positive effects on attracting ULCC
9 service and generating higher ULCC enplanements. We included this second measure of airport
10 market size because non-ULCC enplanements may not align with catchment area population due
11 to hub and focus-city operations, international gateways, multi-airport regions, and airport
12 enplanements. Multicollinearity is not a problem for either sample, given that the correlation
13 coefficient between these two airport market size metrics is -.005 for the full sample of n=471
14 airports used in the logit model, and .277 for the n=178 sample of airports with ULCC service
15 used in the OLS regression.

16 *Travel Purpose*

17 • Tourism importance for local economy (“Tourism”): The emphasis of ULCCs on serving
18 leisure and tourism travel is widely acknowledged in the literature. Tourism employment was
19 derived from County Business Patterns employment data (36) for North American Industry
20 Classification System (NAICS) codes for the Arts, Entertainment, and Recreation industries (71)
21 and the Accommodation and Food Services industries (72). The tourism employment was then
22 standardized according to the following formula:
23
24

$$25 \quad \textit{Tourism Importance} = \frac{\textit{NAICS tourism employees of catchment area}}{\textit{Total employed population of catchment area}}$$

26
27 For counties that are only partially covered by the catchment area, the calculation above includes
28 the entire county’s data if any part of it is reached by an airport’s 70-mile driving-distance
29 catchment area.

30 *Airport Cost per Enplanement (CPE)*

31 • CPE categories: Given their ultra low-cost business model, ULCCs are hypothesized to
32 favor airports with lower airport fees. Data for 2019 airport costs were gathered from the FAA
33 Certification Activity Tracking System (CATS), Operating and Financial Line Item Report 127
34 (37). The cost data reflect total aeronautical revenue across all carriers divided by the number of
35 total enplanements at the airport. Although the data are not specific to ULCCs, it is likely that
36 higher CPE averages at an airport are experienced by all carriers. Initially, 189 of the airports in
37 this study were missing CPE data in the CATS-generated Operating and Financial Line Item
38 Report 127 for Passenger Airline CPE. However, by searching for the Operating and Financial
39 Summary Reports 127 filed by individual airports in the CATS, we were able to find
40 aeronautical revenue data for an additional 79 airports, which we converted to CPE by dividing
41 by the T-100 total enplanements. Then, to avoid eliminating the remaining 110 Part 139 airports
42 that were still missing these data, the CPE data were recoded categorically with three equal
43 classes sorted by dollar amount (\$0-\$3.99; \$4-\$7.99; \$8+) and a fourth category for missing CPE
44

1 data. The \$0-\$3.99 dummy variable was set as the base case and omitted from the regressions,
2 which enables the model to test for significant differences between the low-CPE base group and
3 the two high-CPE groups, and for the missing-CPE group as well. Despite these limitations, the
4 CPE data are worth including as a frequently mentioned factor in ULCC business decisions.

5 6 *Competition*

- 7 • Distance to other ULCC airport: Each airport was mapped to the closest airport with
8 existing ULCC service using the driving distance network analysis tool in ArcGIS Online.
9 Greater distance from competing ULCC airports is hypothesized to positively affect ULCC
10 service and enplanements.
- 11 • Essential Air Services (EAS) airport: Airports with EAS service in 2019 were denoted by
12 a categorical variable value of “1” (38). Subsidized EAS competition at the same airport is
13 hypothesized to deter ULCC service and decrease ULCC enplanements.

14 15 *Proximity*

- 16 • Distance from airport to city center: This variable tests the hypothesis that ULCCs tend to
17 favor more peripheral airports. The same network analysis tool was used to calculate a driving
18 distance in miles from the airport point to the nearest city with 50,000+ residents.
- 19 • Within 70 miles of a border crossing: The network analysis tool was used to generate 70-
20 mile driving distances from each airport. If the network extended across an international border,
21 the airport was assigned a categorical value of “1”. This variable was included because of reports
22 of Canadian citizens crossing the border to save money using ULCCs on the American side.

23 24 *Special Case State Dummy Variables*

25 Three state dummy variables were identified by examining maps of residuals from regressions
26 using the other independent variables. In either the OLS or logit regression, these states’
27 residuals stood out as almost uniformly positive (underpredicted) or negative (overpredicted) and
28 conforming largely to state boundaries. Also, in all three cases a reasonable rationale can be
29 offered for the observed effect.

- 30
31 • Florida: 1 for airports in Florida, 0 otherwise. Florida’s ULCC service was consistently
32 underpredicted, perhaps due to intense tourism traffic and proximity to population centers of the
33 eastern U.S.
- 34 • Texas: 1 for airports in Texas, 0 otherwise. Texas airports were routinely overpredicted,
35 possibly due to the widespread presence of Southwest Airlines throughout the state.
- 36 • California: 1 for airports in California, 0 otherwise. Likewise, California ULCC service
37 was overpredicted probably because of strong competition from Southwest and other carriers for
38 intrastate and western routes.

39
40 Note that tourism importance and the two distance variables were not log-transformed because
41 they were not notably skewed and their scatterplots with respect to \log_{10} of ULCC enplanements
42 did not indicate clear nonlinearity. Relationships in the OLS regression model results must be
43 interpreted accordingly, with these variables producing increasingly large or asymptotic effects
44 on actual ULCC enplanements, as the independent variables get larger or smaller.

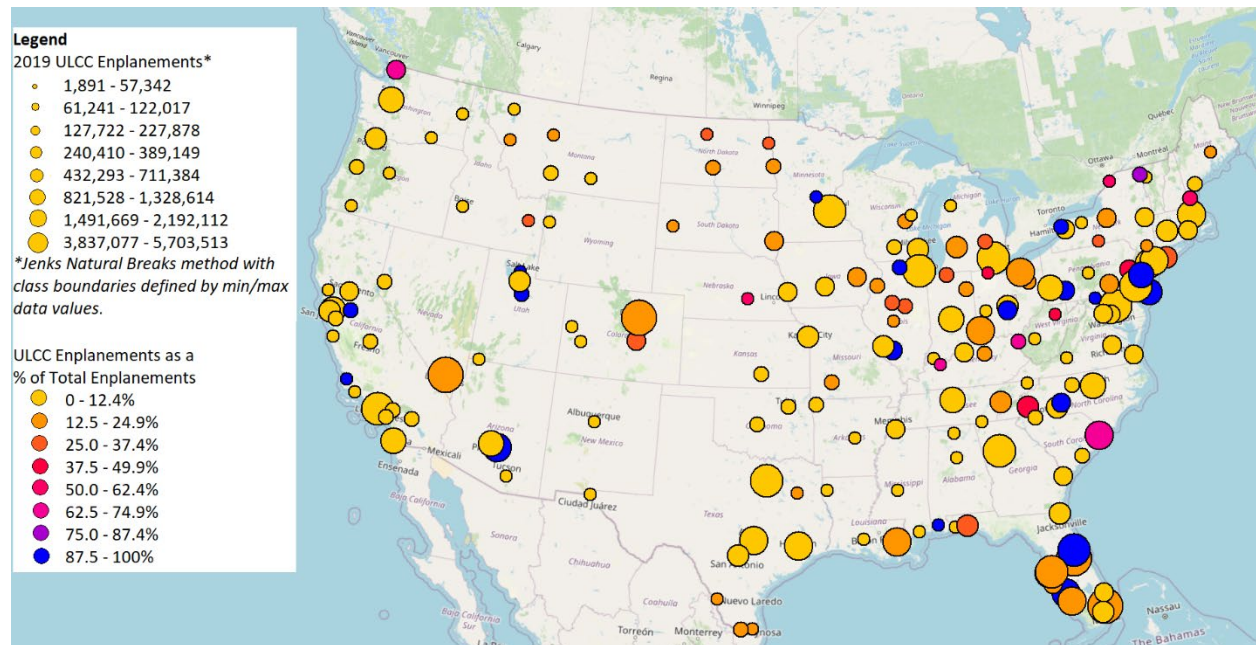
45 46 **Case Study Interviews**

1 Three case studies of airports helped to uncover information that may be left out of a
 2 conventional quantitative analysis. Bellingham, WA (BLI) was selected due to the continued
 3 presence of a ULCC at the airport. Waco, TX (ACT) did not have ULCC service in 2019 despite
 4 having a compelling location in a growing urban region and limited aviation competition.
 5 Finally, Lincoln, NE (LNK) was selected as an airport that lost ULCC service. Interviews were
 6 conducted with a representative of the airport management staff for each airport. The format of
 7 the interview was a short, structured discussion using an identical list of questions. Notes from
 8 each interview were transcribed in process, and limited follow-up questions were asked to gain
 9 further insight to specific topics.

10
 11 **RESULTS**

12 **Existing ULCC Operations**

13 A total of 178 airports in 49 states were served by scheduled ULCC commercial passenger
 14 service in 2019 (**Figure 3**). McCarran International Airport (as it was called in 2019) in Las
 15 Vegas (LAS) led all airports with nearly 5.7 million total ULCC enplanements, followed by
 16 Orlando (MCO), Denver (DEN), and Fort Lauderdale (FLL) each of which exceeded at least 3.8
 17 million enplanements. The top four ULCC airports were served by all four ULCCs during 2019
 18 with the exception that Allegiant serves Orlando via Orlando Sanford (SFB). There is a large
 19 drop-off to the next closest airport, Chicago O’Hare (ORD), with 2.2 million enplanements. At
 20 the other end of the distribution, nine airports served fewer than 10,000 enplaned passengers for
 21 reasons including seasonal, terminated, or new service.
 22



23
 24 **Figure 3 ULCC enplanements combined from Allegiant, Frontier, Spirit, and Sun Country**
 25 **Airlines, 2019, showing the number of ULCC enplanements and ULCC enplanements as a**
 26 **percentage of total airport enplanements.**

27
 28 In percentage terms, there is a bimodal distribution of the ULCC percentage of total
 29 enplanements at each airport, with 86 airports with a ULCC share under 10% and 31 airports
 30 with a share over 45%. Allegiant Air is the most aggressive among ULCCs in pursuing untapped

1 markets, serving as the exclusive regular commercial operator to airports such as Punta Gorda,
2 FL (PGD), Belleville, IL (BLV), and Phoenix-Mesa, AZ (AZA). In addition, exclusive service is
3 provided by Frontier Airlines at Trenton, NJ (TTN), and Spirit Airlines at Atlantic City, NJ
4 (ACY) and Latrobe, PA (LBE). ULCCs capture a minority of market share at 160 airports,
5 normally due to competition from legacy and low-cost carriers at large airports, or from regional
6 airlines at small airports.

7 Florida stands out with both high enplanements and market shares. Nearly every Part 139
8 airport in Florida has ULCC service. The Northeast Corridor and a belt of competitive large
9 airports in the Midwest also emerge. Denver and Las Vegas are the two largest ULCC markets in
10 the west, where few airports exceed 14% in ULCC market share. Higher enplanements in the
11 eastern US reflect the national population distribution and also point to ULCCs' competitiveness
12 against legacy carriers and LCCs in the east. ULCC route maps clearly indicate the primary
13 business strategy of ULCCs connecting northern cities to tourist areas primarily in Florida.

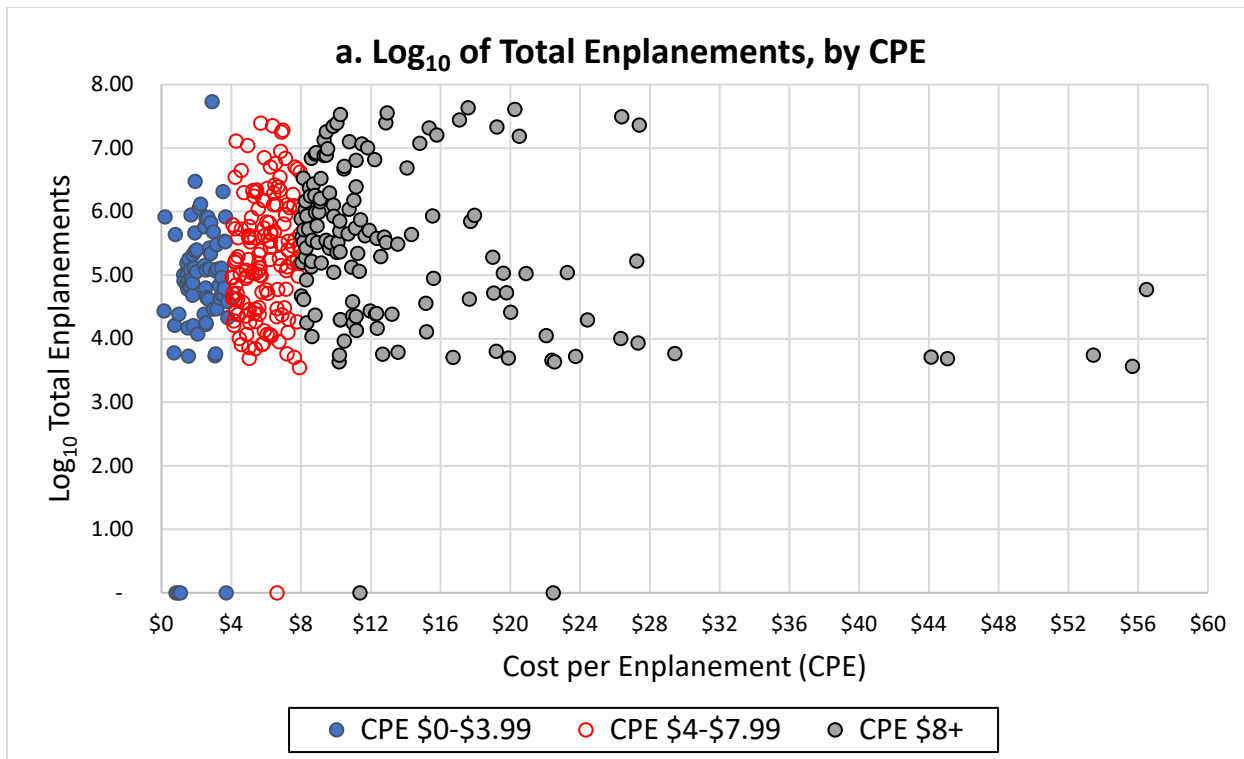
14 **Airport Cost per Enplanement Categories**

15 To help understand which airports are missing CPE data, **Table 1** compares descriptive statistics
16 for the four CPE categories. The airports for which we could not find aeronautical revenues for
17 2019 stand out as having extremely low ULCC and non-ULCC enplanements. While the missing
18 category includes many small airports, they are not necessarily in small cities: the average
19 population in their catchment areas is second-highest (2.89 million), and almost as high as for the
20 high-CPE category (3.03 million). The distance to the nearest other airport for this category also
21 stands out: 67.7 miles, while all the other categories average 90-100 miles. Charles B. Wheeler
22 Downtown Airport (MKC), Teterboro (TEB), and Fort Worth Meachem International (FTW) are
23 good examples of small airports in major multi-airport regions with missing CPE data. Other
24 types of airports missing these data include regional airports such as Anniston, AL (ANB) and
25 Texas Gulf Coast (LBX), as well as airports with limited ULCC service such as St. Cloud, MN
26 (STC) and Glacier Park International (FCA) in Montana. Then, as CPE increases from low to
27 high, both ULCC and non-ULCC enplanements increase substantially, indicating that busier
28 airports report these costs more consistently and report higher values per passenger.

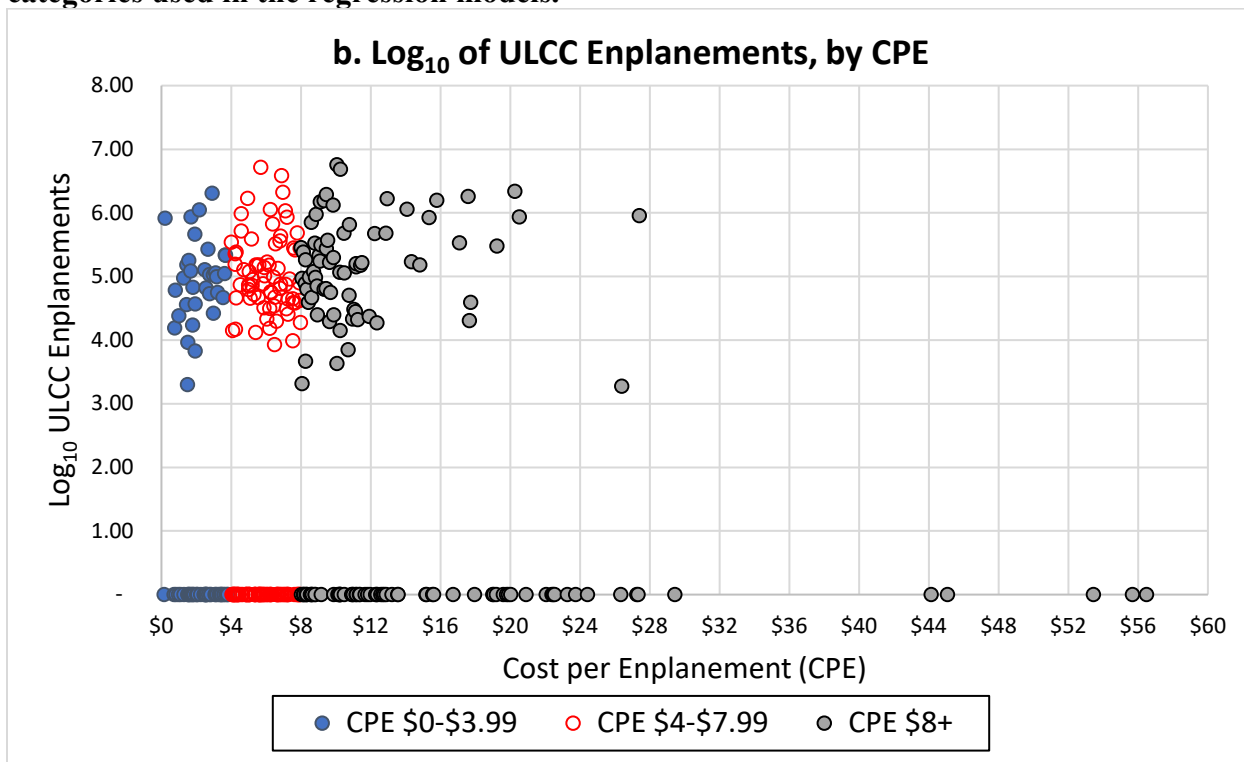
29 The relationship between CPE and enplanements is, however, significantly more complex
30 than indicated by the average enplanements for the four CPE categories in Table 1. **Figure 4a**
31 plots \log_{10} of total enplanements vs. CPE, while **Figure 4b** does the same for ULCC-only
32 enplanements. In terms of total 2019 enplanements, most of the low-CPE airports ($< \$4$) enplaned
33 under 1 million passengers, with the notable exception of Atlanta Hartsfield in the upper left
34 corner. The high-CPE airports ($\geq \$8$) include a range of small, medium, and large airports, but
35 above about \$12 these high-cost airports mostly bifurcate into the very large (over 10 million
36 passengers) or relatively small (under 10,000 per year). Figure 4b, on the other hand, tells a
37 different story for the ULCCs, which appear to find the lower-right section of this scatter
38 incompatible with their ultra low-cost business model. We found only three airports with ULCC
39 service with CPE greater than \$12.35 and ULCC enplanements under 10,000: Parkersburg
40 (PKB) and Clarksburg (CKB) in West Virginia and Huntsville, Alabama (HSV).
41

1 **TABLE 1 Descriptive Statistics for Airport CPE Categories (Mean and Standard Deviation)**

CPE Category	Count	Distance to Nearest City	Distance to Other ULCC Airport	Tourism	Population	ULCC Enplanements	Non-ULCC Enplanements	ULCC Airports	EAS Airports
CPE Missing	110	43.6 (49.2)	67.7 (43.4)	11% (4%)	2,889,877 (3,809,905)	1,687 (11,116)	27,685 (58,149)	4	14
CPE \$0-\$3.99	75	35.2 (46.4)	96.0 (60.7)	10% (3%)	2,153,627 (3,603,817)	103,349 (299,029)	919,651 (6,100,523)	33	12
CPE \$4-\$7.99	146	41.2 (54.8)	95.3 (53.1)	11% (4%)	1,447,522 (1,683,158)	163,097 (578,734)	1,576,680 (3,912,116)	71	28
CPE \$8+	143	49.4 (63.2)	91.0 (53.5)	12% (6%)	3,028,051 (4,699,102)	248,391 (720,558)	3,812,245 (8,029,534)	71	32



1
 2 **Figure 4a Scatterplot of 2019 \log_{10} total enplanements, by cost per enplanement and CPE**
 3 **categories used in the regression models.**



4
 5 **Figure 4b Scatterplot of 2019 \log_{10} ULCC enplanement, by cost per enplanement and CPE**
 6 **categories used in the regression models.**

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Regression Results

Multivariate models of ULCC service and ULCC enplanements are available in **Table 2**. Gauss-Markov assumptions were tested for multicollinearity, autocorrelation of residuals, linearity, and homoscedasticity among the variables. Variance inflation factors (VIFs) ranged from 1.11 to 2.68. The goodness-of-fit statistics for both models are acceptable, with the R^2 of the ULCC enplanements model at 0.48 and the McFadden's pseudo- R^2 of the ULCC service model at 0.46. Both models were run a second time omitting the non-significant independent variables, with no statistically significant changes to the coefficient magnitudes and no change to the statistical-significance levels of the variables.

OLS Regression on ULCC Enplanements

The main takeaways from the ULCC enplanements analysis are the highly significant and positive relationships between catchment area population, non-ULCC traffic, and tourism importance in predicting ULCC enplanements. For every 10-fold increase in the catchment area population, ULCC enplanements increase by 4.63 times. Tourism importance and non-ULCC enplanements were also highly significant and positively associated with ULCC enplanements. The positive relationship between tourism importance (which ranges from 0% to 44.8%) and $\log_{10}(\text{enplanements})$ indicates an exponential relationship between tourism importance and enplanements, or conversely, a relationship that is asymptotic towards zero enplanements as tourism percentage declines towards zero. None of the CPE categories were statistically significant; however, all three cost categories had negative coefficients compared with the base category (CPE \$0-\$3.99), and the magnitude of the negative coefficient increased with cost, as hypothesized. The dummy variables for California and Florida were significant but showed opposite relationships to enplanements, with Florida positive and California negative.

With moderate collinearity between the two distance variables ($r=0.407$) and between distance to the nearest city and the EAS dummy variable ($r=0.521$), we tested OLS model specifications with these three variables included alone or in all combinations of two, but they were never close to being statistically significant.

Logit Regression on ULCC Service

More independent variables were significant in the logit model for 0-1 existence of ULCC service, which is partly a result of the larger sample size ($n=471$). Highly significant relationships at the .01 level or better are evident for five independent variables, with two others significant at 0.05 or better.

As in the enplanements model, airports with higher catchment area populations had a much greater likelihood for ULCC service, with the odds of service 2.9 times higher for every 10-fold increase of catchment population, which implies a positive but rapidly diminishing effect of each additional catchment-area resident. The variable for non-ULCC enplanements was highly significant in both models along with population, providing justification for busy airports being attractive to ULCCs. Once again, all of the airport CPE categories had negative coefficients relative to airports with \$0-\$3.99 CPE, but only the CPE-missing category was significantly so.

1
2

TABLE 2 Model Results

Independent Variable	OLS Model Dep. Var.=Log ₁₀ (ULCC Enplanements.) n=178 R ² =0.48		Logit Model Dep. Var.=1 if ULCC service, 0 if not n=471 McFadden's pseudo-R ² = 0.46		
	Estimate (SE)	p-value†	Estimate (SE)	p-value†	Exp(B) (odds ratio ^a)
(Constant)	-.488 (.706)	.490	-9.592 (2.606)	.000**	.000
Log ₁₀ (Population)	.666 (.104)	.000**	1.060 (.371)	.004**	2.886
Log ₁₀ (nonULCC Enplanements)	.145 (.042)	.001**	.796 (.149)	.000**	2.217
Tourism	.057 (.018)	.002**	-.018 (.049)	.714	.982
CPE Missing	-.039 (.316)	.902	-2.332 (.800)	.004**	.097
CPE \$4.00-\$7.99	-.033 (.125)	.790	-.530 (.377)	.160	.589
CPE \$8+	-.110 (.129)	.394	-.585 (.407)	.151	.557
Distance to Nearest Other ULCC Airport (Miles)	.0003 (.001)	.771	.003 (.003)	.380	1.003
EAS Service in 2019	.126 (.254)	.621	-1.425 (.567)	.012*	.240
Distance to Nearest City (Miles)	-.001 (.001)	.278	-.009 (.004)	.021*	.991
Within 70 miles of a Border Crossing	.103 (.146)	.483	2.428 (.604)	.000**	11.337
CA Dummy	-.465 (.146)	.002**	.048 (.592)	.936	1.049
FL Dummy	.478 (.161)	.003**	-.096 (.612)	.876	.909

TX Dummy	-.025 (.190)	.897	-2.226 (.570)	.000**	.108
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†Significant at the 95% (*) or 99% (**) level.

°The odds ratio = the odds that an airport will have ULCC service per unit increase in the independent variable (X). In the case of a 0-1 independent variable such as EAS presence, location near an international border, the CPE categories, or state dummy variables, the odds ratio is the odds of an airport having ULCC service in the presence of such conditions divided by the odds in the absence of such conditions. In the case of a continuous independent variable such as distance or tourism importance, it is the increase of the odds of ULCC service per unit increase of the X variable. In the case of log-transformed independent variables such as log₁₀ of population and nonULCC enplanements, it is the increase of the odds of ULCC service per 10-fold increase of the X variable.

The Heckman selection model results confirmed that the CPE categories are not statistically significant predictors of ULCC service. The odds of a ULCC operating at a given airport with EAS service are 24% of the odds of a ULCC operating at an airport without EAS subsidies, indicating a reluctance by ULCCs to compete with EAS service. Distance to the nearest city was significantly and negatively associated with an airport having ULCC service, but distance from an airport with existing ULCC service was not significant. Location within 70 miles of an international border was not significant in predicting enplanements in the OLS regression but is highly significant for predicting existence of ULCC service. Specifically, it increases the odds of having ULCC service 11.34 times relative to the odds of ULCC service at airports not near a border. The variable for tourism importance and the California and Florida dummy variables were also not statistically significant in the logit model, but the Texas dummy variable is highly significant, suggesting that Southwest Airlines’ domination of its home state discourages ULCC service.

Case Studies

Three case studies provide additional context and qualitative analysis to the 2019 operational data and regression analyses.

Bellingham, Washington – Existing ULCC Service

Bellingham International Airport (BLI) has been attractive to LCCs since deregulation. More recently, Allegiant began service to BLI in 2008, and in 2019 held two-thirds of the airport’s market share (39). Frontier established ULCC service at Bellingham in 2015, but ceased all flights to the airport a few years later (40).

Several factors may explain the appeal of Bellingham to ULCCs. First, BLI is only 20 miles from the Canadian border and close to Vancouver. Combining Vancouver’s metropolitan area population of 2.5 million and the 4 million north of Seattle, Bellingham has a large catchment area population despite relatively low population densities in the vicinity of the airport itself. According to airport management, roughly 65% of air passengers at Bellingham are Canadian residents. Many cross the border to Bellingham when the exchange rate is favorable. Canada tends to have higher airfares due to steep fees and taxes imposed by government authorities on airline operations (41). Bellingham also assesses low fees per passenger to airlines and discounted rates for car parking. Fees for car parking account for 60% of BLI’s revenues in a given year. Smaller airports like BLI want to attract carriers that will draw travelers to drive and park their cars on airport property; airlines with a leisure focus tend to facilitate that goal by attracting passengers who place a lower value on time spent traveling to and moving through an airport (34).

1 While the presence of Allegiant at Bellingham corroborates the importance of select
2 border locations to ULCC business models, the case suggests that airports that rely heavily on
3 cross-border travelers are vulnerable to shifts in currency exchange rates. Due to a decline in
4 enplanements since 2012, Bellingham initiated an Airline Incentive Program in 2018, seeking to
5 offer benefits such as waived landing fees and remain-overnight fees for new airlines or current
6 airlines offering new routes for a fixed duration. It remains to be seen whether existing or new
7 carriers will take advantage of such incentives or if the Bellingham market is substantial enough
8 for the incentives to be worth the costs of service.

9
10 *Waco, Texas – No Existing ULCC Service*

11 Waco Regional Airport (ACT) lies a mere six miles from downtown Waco, located between
12 Dallas-Fort Worth and Austin. Home to Baylor University and nearly one million residents,
13 Waco is a steadily growing population hub in central Texas. Currently, American Airlines
14 operates five daily flights aboard regional jets connecting Waco to its Dallas-Fort Worth (DFW)
15 hub for onward connections. ACT reported fewer delays on arriving flights than nearly all other
16 Texas airports. While Waco’s tourism importance metric was average for the state, the median
17 income, distance to the nearest city, and distance to other airport variables were favorable to
18 Waco in relation to airports that currently host ULCCs. The scarcity of service can be attributed
19 primarily to the lack of a sizeable population in the immediate vicinity of Waco and few
20 substantial pull factors for tourists. While the proximity of Waco to Dallas and Austin would
21 indicate the potential for ULCC service as a secondary airport to either destination, the airport is
22 perhaps too far from either location to be viewed as a successful market for a ULCC. Lieshout
23 (34) estimated that prospective passengers are not likely to drive farther than two hours when
24 seeking an airport. Per airport management, expansions to Interstate 35 connecting Dallas, Waco,
25 Austin, and points beyond will reduce the time and hassle of driving, likely increasing the degree
26 of air traveler leakage to other airports. Also, Waco may simply be too far south to be a source of
27 tourists to Florida and other Gulf Coast beaches. A similar airport with metropolitan area
28 proximity and size in the northern half of the country would probably be better positioned to
29 market itself as a source for leisure travelers escaping to warmer climates.

30
31 *Lincoln, Nebraska – Lost ULCC Service*

32 Many airports in the United States have been featured on a ULCC route map at one time or
33 another, only to have service cancelled by the carrier. Allegiant Air service to Lincoln Airport
34 (LNK), Nebraska commenced in 2006 with twice-weekly flights to its Las Vegas hub. The
35 flights were meeting their load factor targets at about 90% capacity per flight (42). Two and a
36 half years later, the airline announced that service would be transferred 85 miles west to Central
37 Nebraska Regional Airport in Grand Island (GRI) instead. GRI is eligible for EAS-subsidized
38 flights and is served by American Eagle offering daily flights to Dallas-Fort Worth (DFW). It
39 may not seem logical for a leisure-driven airline to shift service from a city of 290,000 to a
40 distant EAS market less than one-fifth the size, however this reality underscores the ULCC
41 strategy of maximum cost efficiency. Despite its status as a prominent university town and state
42 capital, Lincoln has struggled for years to maintain and grow LCC service. LNK leaks 75% of
43 potential passengers to Omaha (OMA), the core of the regional economy 62 miles northeast. At
44 one hour’s driving time, Omaha – and the seven major carriers that fly there, including
45 Southwest Airlines – can quickly be reached from Lincoln, but not from Grand Island, 155 miles
46 distant.

1 Allegiant’s own statements following its move to Grand Island in 2008 confirmed that
2 competitive influences from Southwest coupled with high fuel costs at Lincoln triggered the shift
3 in service (42). Further, some of the highest demanded destinations from Lincoln are in Texas,
4 due largely to University of Nebraska athletics. Currently, flights to Texas operate out of Omaha
5 as well as Grand Island. This is a losing scenario for Lincoln in which even highly demanded
6 flights are deemed unprofitable. LNK is restricted by an arrangement with its fixed base
7 operator, which sets fuel prices for all carriers. Typically, at an airport of its size, airport
8 management would be granted more control over fuel prices. As a result, operational costs are
9 higher at Lincoln than at Grand Island specifically, which matters to ULCC operators. Ultimately
10 the case study outlines the importance of cost in a competitive multi-airport environment and
11 provides indication that ULCCs may be willing to adjust service solely because of cost.

12 13 **DISCUSSION**

14 One of the most surprising findings of this study are the relatively few similarities and many
15 differences in which independent variables are significant between the OLS and logit regression
16 results. The main similarity is the significance and large positive coefficients of the size variables
17 (population and non-ULCC enplanements), which to a certain extent represent control variables.
18 In the OLS, the standardized beta coefficients (not shown in Table 2) indicate a much larger
19 effect on ULCC enplanements of a one-standard-deviation change in the population variable
20 (.519) vs. that for a similar change in tourism (.188). This difference in effect size could be
21 related to population being important to both origins and destinations while tourism employment
22 is mainly important for ULCC destinations.

23 There were many differences between the two models, some of which are explainable
24 while others require further research. First, it makes sense that tourism is much more significant
25 for enplanements than existence of service, given that the largest ULCC airports are
26 entertainment hubs, while there are a range of origin airports sending passengers to these and
27 other tourist destinations. Airports on both ends of a route do not need to be tourist-focused.
28 Route maps strongly suggest that some ULCCs tend to pair tourism-low origins and tourism-
29 high destinations together in ways that would detract from a binary regression analysis. The
30 tourism variable also suffered from special cases in the data, although these cases were too
31 numerous to be considered outliers. Only one of the sixteen airports among the largest values for
32 tourism importance supported ULCC service in 2019. Airport markets including Aspen, CO
33 (ASE), Key West, FL (EYW), and Grand Canyon, AZ (GCN) had tourism values exceeding 0.2
34 but did not have ULCC service. Furthermore, some of the lowest-ranked airports for tourism
35 such as Idaho Falls, ID (IDA), Tyler, TX (TYR), and Fayetteville, AR (XNA) feature ULCC
36 service despite tourism levels under 0.08 within their catchment areas; these ULCCs appear to be
37 serving tourist destinations farther away than 70 miles.

38 Second, two of the three distance variables—to the nearest cities (-) and within 70 miles
39 of an international border (+)—are significant in the logit model but not in the OLS regression
40 for ULCC enplanements. Because the majority of ULCC airports are in small-to-medium size
41 cities, these distance variables do not necessarily lead to high-volume traffic but their effect on
42 whether or not ULCCs offer service is clearer. While it seems natural that areas farther from the
43 nearest city would have fewer ULCC enplanements, the lack of significance may be explained
44 by the range of airports served by ULCCs which can be urban or remote. The distance
45 relationships are complicated by conflicting effects of competition, leakage, and accessibility,
46 and warrant further study. The lack of significance of distance to the nearest existing ULCC

1 airport in both regressions is likely due to isolation from other ULCC airports being viewed as an
2 asset or a barrier. Certain ULCCs, such as Allegiant Air, seem to seek secondary or regional
3 airports with lower costs and less competition. Other ULCCs such as Spirit Airlines see the
4 benefits of competing directly with legacy carriers based on fares, and will operate to major hub
5 airports. Parella (9) found that individual ULCCs may try to serve a multi-airport region from a
6 single airport. Therefore, enplanements are split between outlying and primary airports, and the
7 relationship between distance from non-ULCC airports and enplanements is muddled by these
8 factors.

9 Third, the existence of EAS service is a factor in whether ULCCs choose to operate in
10 small markets, and would not be expected to explain high enplanements in a sample that
11 excludes airports with zero ULCC enplanements.

12 Fourth, it makes sense that Florida is associated with higher enplanements but not with
13 greater likelihood of ULCC service. Florida's coastlines are densely populated with many Part
14 139 airports, which makes it possible for ULCCs to provide convenient service while operating
15 out of a smaller *percentage* of airports.

16 Finally, airport CPE is widely assumed to be important to the business models of all four
17 ULCCs. While the signs and sizes of the B coefficients on CPE \$4.00-\$7.99 and CPE \$8.00+ are
18 consistent with the hypothesis that higher CPE increasingly reduces the likelihood and volume of
19 ULCC service, none of these variables are statistically significant. This may be because, in
20 addition to being attracted to low-fee airports, ULCCs also operate at many highly demanded
21 airports because these airports serve major tourist destinations, major metropolitan areas, or both,
22 despite these airports historically having higher aeronautical fees levied for ramp, gate, and
23 overnight storage than smaller airports (16).

24 **CONCLUSIONS**

26 The aim of this paper was to analyze the domestic aviation markets served by ultra low-cost
27 carriers, and to determine which market factors are the most conducive for enabling the
28 expansion of these carriers. Based on previous research and a preliminary review of ULCC
29 business patterns, it was hypothesized that ULCC operations are heavily dependent on tourist
30 passengers to stimulate air service and sought out airports with lower airport fees, but the signal
31 from these variables were mixed. Several other factors that may influence whether or not ULCC
32 service is established, especially at smaller airports, were found. Gaps in available data made a
33 comprehensive analysis of airport costs a challenge.

34 Through an examination of literature, documentation of existing conditions for ULCC
35 operations, regression analysis, and qualitative case studies, several conclusions can be drawn in
36 regards to the relationship between ULCCs and airport choice factors. The regression analyses
37 yielded strong ties between the airport market size variables—the population of an airport's
38 catchment area and the non-ULCC enplanements—and ULCC operations in terms of
39 enplanements and presence of service. The importance of the local tourism economy also is
40 significant to ULCCs from a volume standpoint but not for explaining the existence of ULCC
41 service. However, several variables including proximity to the nearest city and to a border
42 crossing were significant in predicting whether or not ULCC service exists. A lack of EAS
43 service also favored airports to receive ULCC service. Several state dummy variables
44 highlighted Florida airports for larger enplanements and California and Texas for lower
45 likelihood of ULCC service, all else being equal.

1 For airport-level analysis, further research is warranted into the complex relationships
2 between ULCC service and distance to the nearest city, airport CPE, climate, and demographic
3 characteristics. A single 70-mile driving distance standard was applied to all airport catchment
4 areas here; testing of other distances, flexible distance standards, or a multi-band approach, could
5 improve on these initial results. A more sophisticated approach to modeling multi-airport
6 regions, in terms of both competition and catchment population, could also prove fruitful.
7 Classification of airports into tourism origins versus tourism destinations might be valuable but
8 challenging considering the wide variety of leisure trips and distances from airports to tourist
9 destinations. A more promising direction may be to extend this research to analyze origin-
10 destination data, which could better indicate the extent to which tourism origins and destinations
11 are paired for ULCC service and whether high-tourism locations were consistently the
12 destinations of ULCC round trips. This study was not able to analyze this hypothesis, and
13 ultimately the tourism independent variable was significant only in the OLS regression. More
14 case studies, multi-year analyses, single-airline or multinomial logit analyses, and passenger
15 survey research into preferences and choices are promising directions to deepen our
16 understanding of ULCCs.

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29

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31 The authors confirm contribution to the paper as follows: study conception and design: Drew
32 Taplin, Michael Kuby, Deborah Salon; data collection: Drew Taplin; analysis and interpretation
33 of results: Drew Taplin, Michael Kuby, Deborah Salon, David King; draft manuscript
34 preparation: Drew Taplin, Michael Kuby, Deborah Salon. All authors reviewed the results and
35 approved the final version of the manuscript.
36

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