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August 7, 1997

VIA FACSIMILE

Mr. George Wellington
Chief, Foreign Air Carrier Licensing Division
U.S. Department of Transportation
Room 6412
400 Seventh Street, S.W.
Washington, D.C. 20590

Re: August 6, 1997 Request for a Statement of
Authorization of ABSA-Aerolinhas Brasileiras, S.A.

Dear Mr. Wellington:

Emery Worldwide Airlines, Inc. ("Emery Air") objects to the application of ABSA-Aerolinhas Brasileiras, S.A. ("ABSA"), a Brazilian airline, for authority to conduct 26 roundtrip fifth-freedom flights. ABSA proposes to operate two weekly Sao Paulo-Lima-Miami roundtrip cargo flights between August and October 1997 using DC-8-71 equipment, carrying unspecified quantities of asparagus.

Although ABSA's application indicates that the fact of Brazilian reciprocity has been established with DOT, Emery Air does not believe Brazil would approve a comparable program of fifth-freedom charter flights, or even ad hoc fifth-freedom charters, by a U.S. carrier. Emery Air does not recall a single instance when Brazil has approved an Emery Air fifth-freedom charter request, and Brazil has denied Emery Air fifth-freedom charter authority on several occasions. For example, Brazil denied an Emery Air request for authority to operate 12 one-way Brussels-Campinas (Brazil) cargo charters with DC-8 aircraft between March and June 1996.

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Mr. George Wellington
August 7, 1997
Page 2

CROWELL & MORING LLP

Emery Air operates DC-8 aircraft, and Emery Air believes it could accommodate the proposed traffic, although the volume of the shipments is not indicated on the application.

Respectfully submitted,

Lorraine B. Holloway

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Counsel for
Emery Worldwide Airlines, Inc.

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