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May 14, 1997

Mr. Paul L. Gretch  
Director, Office of International Aviation  
U.S. Department of Transportation  
400 Seventh Street, S.W.  
Room 6402  
Washington, DC 20590

Re: Aeroflot Russian International Airlines  
Application for Statement of Authorization  
(Shannon-Miami-Shannon)

Dear Mr. Gretch:

Aeroflot Russian International Airlines hereby replies to the answer submitted by United Airlines on May 13 in response to Aeroflot's May 7 application for Statement of Authorization for Shannon-Miami-Shannon charter service.

United's sole allegation concerns its proposed code-share arrangement with Lufthansa. In response, Aeroflot must once again reiterate that the problems regarding United's proposed code-share service result from a unique and complex fact situation. Most significantly, the fact that United's proposed code-share arrangement with Lufthansa is barred by a bilateral agreement between Germany and Russia presents an unprecedented complication. This situation has previously been discussed by representatives of the United States and of Russia and the Government of Russia has advised the U.S. Government of its view that the code-sharing provisions require additional clarification and improvement. Under these circumstances, Aeroflot respectfully submits that the issue would best be resolved by further discussions between the concerned governmental parties; not by unilateral punitive action.

Moreover, the Department's decision should not be based exclusively on the United-Lufthansa issue. United's answer cites DOT Order 95-11-8 in support of its opposition to Aeroflot's application. In addition to the proposed United-Lufthansa code-share service, Order 95-11-8 also addressed Alaska Airlines then proposed service to Petropavlovsk. When deciding this matter, the Department should consider the progress that has been made

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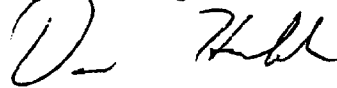
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since issuance of that order with regard to Alaska's ongoing service to Petropavlovsk as well as with regard to the Northwest/Alaska code-share service to Russia. Denial of Aeroflot's request to operate limited Shannon-Miami charter service would be inappropriate and potentially counterproductive given the progress that has been made with regard to those other issues.

Denial of Aeroflot's request also would create significant problems for the Irish-originating passengers who are depending on Aeroflot's service. In all likelihood, it would require those passengers to cancel their vacation plans. It also would deprive the Miami area of the resulting economic benefits.

Accordingly, Aeroflot respectfully renews its request for a statement of authorization to operate Shannon-Miami-Shannon charger service. Given that the first proposed flight is scheduled for this Saturday, May 17, Aeroflot requests that the Department grant the requested authority without further delay.

Respectfully submitted,



Don H. Hainbach  
Counsel for Aeroflot Russian  
International Airlines

DHH:sp  
cc: Jeffrey Manley, Esq.

a:aeroflot