

**BEFORE THE
U.S. DEPARTMENT OF TRANSPORTATION
WASHINGTON, D.C.**

Applications of)		
)		
EL AL ISRAEL AIRLINES, LTD.)		
)	Dockets	OST-95-472 (47986)
for renewal of exemptions under)		OST-97-2547 (48826)
49 U.S.C. section 40109)		
)		

**OBJECTION OF GREATER ORLANDO AVIATION AUTHORITY
TO ORDER TO SHOW CAUSE**

Communications with respect to this document should be addressed to:

Keith A. Phildius, Sr.
Director, Marketing and International
Development
GREATER ORLANDO AVIATION
AUTHORITY
Orlando International Airport
One Airport Boulevard
Orlando, FL 32827-4399
(407) 825-3896

Jonathan Blank
PRESTON GATES ELLIS
& ROUVELAS MEEDS LLP
1735 New York Avenue, N.W.
Suite 500
Washington, D.C. 20006
(202) 628-1700

Dated: May 28, 1997

**BEFORE THE
U.S. DEPARTMENT OF TRANSPORTATION
WASHINGTON, D.C.**

Applications of)		
)		
EL AL ISRAEL AIRLINES, LTD.)		
)	Dockets	OST-95-472 (47986)
for renewal of exemptions under)		OST-97-2547 (48826)
49 U.S.C. section 40109)		
)		

**OBJECTION OF GREATER ORLANDO AVIATION AUTHORITY
TO ORDER TO SHOW CAUSE**

The Greater Orlando Aviation Authority (“Orlando”) submits this answer to the Department of Transportation’s (“Department’s”) Order to Show Cause as to why El Al’s application for a renewal of El Al’s exemption to serve Orlando should not be denied. As explained below, the Department’s Show Cause Order is precipitous, premature and will be ineffectual.

Orlando receives service from El Al on a code share basis and on a seasonal non-stop basis. Summer is the peak season. The proposed sanction would penalize travelers to Orlando, as well as tour operators and hotels, which have many reservations and tours booked already on flights which would be affected by the Order. The Order, however, does not give any consideration to the impact on these travelers, or to the impact on visitors to Orlando’s hotels and attractions.

Moreover, the proposed remedy is not likely to be effective. Because El Al can continue its Miami service it will, in all likelihood, re-route its Orlando flights from Orlando to Miami, and then arrange charter buses to Orlando. While this would diminish

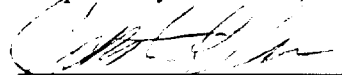
the quality of the trip, adversely affect Orlando and its visitors, as well as the attractions, it would not, in the end, prevent El Al from carrying the passengers. Removing El Al's authority to serve Orlando would only require El Al to provide an inferior service to the traveling public.

Orlando receives much service, both scheduled and charter, on an extra-bilateral basis. These flights are often sold through tour groups months in advance. If tour operators come to believe that they cannot rely on exemption service, tourist destinations in the United States such as Orlando will pay a heavy price.

The United States has an interest in protecting its bilateral rights, including fifth freedom service. But it also has a strong interest in continuity of air service to its tourist destinations. It should not precipitously disregard this latter interest on behalf of a quickly fashioned fifth-freedom service that the carrier will either serve or drop, depending on how bookings develop.

This dispute should be resolved through negotiations, not sanctions. Orlando respectfully requests that the Department slow down its headlong rush to sanctions and reconsider the option of attempting to work this out through bilateral negotiations.

Respectfully submitted,



Jonathan Blank
PRESTON GATES ELLIS
& ROUVELAS MEEDS LLP
1735 New York Avenue, N.W.
Suite 500
Washington, D.C. 20006
(202) 628-1700

Dated: May 28, 1997