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BEFORE THE
DEPARTMENT OF TRANSPORTATION
WASHINGTON, D.C.

DEPT. OF TRANSPORTATION
ROCKETS
02 DEC 23 PM 4: 17

2002/2003 HONG KONG FIFTH-FREEDOM ALL-
CARGO FREQUENCY PROCEEDING

Docket OST-2002-14049

**ANSWER OF EVERGREEN INTERNATIONAL AIRLINES, INC. IN SUPPORT
OF POLAR AIR CARGO INC.'S PETITION FOR RECONSIDERATION AND
FEDERAL EXPRESS CORPORATION'S PETITION FOR RECONSIDERATION
OF TECHNICAL ISSUES IN ORDER INSTITUTING PROCEEDING**

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Dated: December 23, 2002

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Evergreen International Airlines, Inc. ("Evergreen") hereby files this answer in support of the petition for reconsideration filed by Polar Air Cargo, Inc. ("Polar") on December 17, 2002, and the petition for reconsideration of technical issues in the order instituting this proceeding filed by Federal Express Corporation ("FedEx") on December 18, 2002, which request modifications in the Department's evidence requests bearing on the traffic information to be supplied by the parties.

1. Polar's Petition for Reconsideration. Polar has requested that the Department modify the base year period for traffic forecasts to calendar year 2001, and likewise modify the requirement for the submission of historic schedules. Evergreen fully supports this request, which is in the public interest. As noted by Polar, the T-100 data that would be necessary to prepare a traffic forecast for the 12-month period ended June 30, 2002 is not readily available, and a requirement to rely upon it would unnecessarily complicate the proceeding. Therefore, the

grant of this request would remove an unnecessary burden on the parties and have a beneficial effect on the efficient management of this proceeding.¹

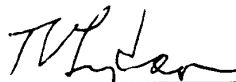
2. FedEx's Petition for Reconsideration. FedEx has requested that the Department modify the requirement for the submission of schedule data in paragraph two of the evidence request to require "snapshots" of each carrier's schedules taken at the beginning of IATA traffic seasons. Evergreen supports this request. As currently written, the paragraph in question appears to require large volumes of data that are not relevant to this case, and which would be burdensome to produce. Evergreen also supports FedEx's request that the Department clarify what data is encompassed by its reference to "schedules." As FedEx has noted, due to the different ways in which various cargo carriers operate, the term can have different meanings that render direct comparisons difficult. Accordingly, it is essential that the parties have a clear understanding of the Department's wishes in this regard. The granting of these requests would clarify the scope of the evidence request and enhance the expeditious conclusion of this proceeding.

WHEREFORE, Evergreen International Airlines, Inc. respectfully requests that Polar's petition for reconsideration and FedEx's petition for reconsideration of technical issues in the order instituting this proceeding be granted as set forth above.

¹ Polar's petition also requested corresponding modifications in the procedural schedule. Evergreen is a signatory to the joint motion, filed on December 18, 2002, which requested modifications in the procedural schedule.

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Evergreen International Airlines, Inc.
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Respectfully submitted,



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