

BEFORE THE
DEPARTMENT OF TRANSPORTATION
OFFICE OF THE SECRETARY
WASHINGTON, D.C.

Application of	:	
	:	
UNITED PARCEL SERVICE CO.	:	Docket OST-98-3955
	:	
for amendment of its certificate	:	
of public convenience and necessity for	:	
Route 557 pursuant to 49 U.S.C. §41102	:	
(Foreign All-Cargo Air Transportation)	:	

**ANSWER OF
FEDERAL EXPRESS CORPORATION**

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July 8, 1998

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Pursuant to Rule 1720(d) of the Rules of Practice of the Department of Transportation (the Department), Federal Express Corporation (Federal Express) hereby submits this Answer in response to the Application of United Parcel Service Co. (UPS) for an amendment to its Certificate of Public Convenience and Necessity for Route 557 to authorize UPS to provide scheduled foreign all-cargo air transportation between the U.S. and forty-eight (48) foreign countries, all of which appear to impose no limitation on U.S.-flag all-cargo service designations.

Federal Express is not opposed to grant of the expanded international all-cargo authority applied for by UPS, provided that the comparable application filed by Federal Express on June 29, 1998 in Docket OST-98-4010 for issuance of a new certificate authorizing Federal Express to serve essentially the same foreign countries is granted concurrently.

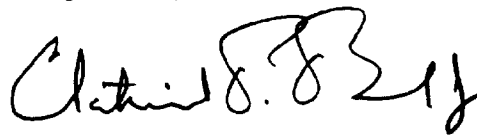
Federal Express is not formally requesting consolidated consideration of its essentially conforming application with that of UPS pursuant to Rule 1720(c) of the Department's Rules of Practice, in view of the absence of any controversy, mutual exclusivity or other circumstance warranting any extensive briefing or evidentiary procedures in the case of the two applications at issue. Federal Express submits that the non-exclusive and non-controversial nature of the additional all-cargo service authority requested by both Federal Express and UPS warrants expedited and concurrent grant of both applications.

WHEREFORE, Federal Express respectfully urges the Department to issue an expedited Order granting the pending certificate applications of Federal Express and UPS for authority to provide scheduled foreign air transportation of property and mail between points in the United States and points in forty-eight (48) foreign countries, as requested in their respective applications.

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Respectfully submitted,



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