

BEFORE THE  
DEPARTMENT OF TRANSPORTATION  
WASHINGTON, D.C.

DEPARTMENT OF TRANSPORTATION

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BOOKING SECTION

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Application of :

UNITED PARCEL SERVICE CO. :

For an Amendment of Its Certificate of Public  
Convenience and Necessity For Route 557 :  
Pursuant to 49 U.S.C. § 41102 :  
(Foreign All-Cargo Air Transportation) :

Docket OST-98-3955

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Application of :

FEDERAL EXPRESS CORPORATION :

For Issuance of a New Certificate  
of Public Convenience and Necessity :  
Pursuant to 49 U.S.C. § 41102 :  
(Foreign All-Cargo Air Transportation) :

Docket OST-98-4010

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CONSOLIDATED ANSWER OF  
EMERY WORLDWIDE AIRLINES, INC.

Communications with respect to this document  
should be sent to:

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President and Chief Operating Officer  
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Counsel for  
Emery Worldwide Airlines, Inc.

July 10, 1998

BEFORE THE  
DEPARTMENT OF TRANSPORTATION  
WASHINGTON, D.C.

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CONSOLIDATED ANSWER OF  
EMERY WORLDWIDE AIRLINES, INC.

On June 12, 1998, United Parcel Service Co. ("UPS") applied to amend its Certificate of Public Convenience and Necessity for Route 557 to authorize UPS to engage in scheduled foreign air transportation of property and mail between any

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point or points in the United States and any point or points in 48 named countries.<sup>1</sup> On June 29, 1998, Federal Express Corporation ("Federal Express") filed a similar application, seeking a new certificate of public convenience and necessity authorizing scheduled foreign all-cargo air transportation between points in the U.S. and points in 46 of the same countries named by UPS, as well as in Barbados and New Zealand.<sup>2</sup> Emery Worldwide Airlines, Inc. ("Emery Air") does not object to grant of the UPS and Federal Express applications so long as the Department awards similar authority to Emery Air.

Emery Air is today applying to amend its Certificate of Public Convenience and Necessity for Route 598 to include scheduled foreign air transportation of property and mail between any point or points in the United States and any point or points in the 48 countries named in the UPS application plus several other countries which do not limit U.S. cargo carriers.<sup>3</sup> Granting the authority requested

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<sup>1</sup> Albania, Armenia, Aruba, Azerbaijan, Belarus, Bosnia, Botswana, Bulgaria, Côte d'Ivoire, Costa Rica, Croatia, Czech Republic, Dominican Republic, El Salvador, Estonia, Ethiopia, Georgia, Ghana, Greece, Guatemala, Honduras, Hungary, Iceland, Jordan, Kuwait, Kyrgyz Republic, Latvia, Lithuania, Macau, Macedonia, Malawi, Malta, Moldova, Namibia, The Netherlands Antilles, Nicaragua, Poland, Peru, Qatar, Slovakia, Slovenia, Tajikistan, Tanzania, Trinidad and Tobago, Turkmenistan, Uganda, Uzbekistan, and Zaire.

<sup>2</sup> The two countries named by UPS but not named by Federal Express were Iceland and Kuwait.

<sup>3</sup> The additional countries are: Antigua and Barbuda, Belize, Bolivia, Curacao, the Federated States of Micronesia, French Guyana, Guyana, Haiti, Kazakstan, the Marshall Islands, Palau, Panama, Paraguay, St. Kitts and Nevis, St. Vincent and Grenadines, Suriname and Uruguay.

by Emery Air and the other applicants will permit them to provide more comprehensive air transportation of property and mail to the consumers of such services and to better meet the needs of shippers in the U.S. and foreign countries. Granting the requested authority will also conserve the Department's resources by avoiding the need for individual applications for specific countries.

For the foregoing reasons, Emery Air supports the applications of UPS and Federal Express as long as Emery Air receives comparable expanded authority.

Respectfully submitted,

CROWELL & MORING LLP

/s/ Lorraine B. Halloway

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Lorraine B. Halloway

/s/ Derek Dickinson

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Derek Dickinson

Counsel for  
Emery Worldwide Airlines, Inc.

CERTIFICATE OF SERVICE

I certify that I have this date served the foregoing document on Federal Express, UPS and all parties served with their applications in accordance with the Department's Rules of Practice.

/s/ Lorraine B. Halloway

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Lorraine B. Halloway

July 10, 1998

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