

BEFORE THE  
DEPARTMENT OF TRANSPORTATION  
WASHINGTON, D.C.

-----  
NEW U.S.-ARGENTINA COMBINATION  
SERVICE OPPORTUNITIES  
-----

:  
: Docket OST-99-6210  
:  
:

AMENDMENT TO  
APPLICATION OF CONTINENTAL AIRLINES, INC.  
FOR A CERTIFICATE OF PUBLIC CONVENIENCE  
AND NECESSITY AND FREQUENCY ALLOCATION

Communications with respect to this document should be sent to:

Rebecca G. Cox  
Vice President, Government Affairs  
CONTINENTAL AIRLINES, INC.  
1350 I Street, N.W.  
Washington, DC 20005

R. Bruce Keiner, Jr.  
Michael R. Finley  
CROWELL & MORING LLP  
1001 Pennsylvania Avenue, N.W.  
Washington, D.C. 20004-2595  
(202) 624-2500

Hershel I. Kamen  
Staff Vice President, International  
& Regulatory Affairs  
CONTINENTAL AIRLINES, INC.  
P.O. Box 4607 -- HQSGV  
Houston, TX 77210-4607

Counsel for  
Continental Airlines, Inc.

September 22, 1999

**NOTICE:** Answers supporting or opposing this amendment to Continental's application are due on or before September 29, 1999.

BEFORE THE  
DEPARTMENT OF TRANSPORTATION  
WASHINGTON, D.C.

-----  
NEW U.S.-ARGENTINA COMBINATION  
SERVICE OPPORTUNITIES  
-----

:  
: Docket OST-99-6210  
:  
:

AMENDMENT TO  
APPLICATION OF CONTINENTAL AIRLINES, INC.  
FOR A CERTIFICATE OF PUBLIC CONVENIENCE  
AND NECESSITY AND FREQUENCY ALLOCATION

Continental<sup>1</sup> amends its application in Docket OST-99-6166, consolidated by the Department into this proceeding, to add a request for Houston-Buenos Aires authority and the seven weekly frequencies which become available June 1, 2001, so Continental can offer daily Houston-Buenos Aires service as well as Newark-Buenos Aires service and to provide additional information required by the Department's Notice of New U.S.-Argentina Combination Service Opportunities served September 8, 1999.

Continental states as follows in support of its application:

1. In addition to its previous application for Newark-Buenos Aires authority, Continental requests authority to provide scheduled foreign air transportation of persons, property and mail between Houston, Texas and Buenos

September 22, 1999

Aires, Argentina, and for an allocation of the seven U.S.-Argentina frequencies which become available June 1, 2001 to offer daily Houston-Buenos Aires flights.

2. Continental plans to operate daily, year-round Newark-Buenos Aires service beginning September 1, 2000, or 120 days after receipt of all necessary government authority, whichever is later. Continental initially will offer daily, nonstop Newark-Buenos Aires service using Continental's DC-10-30 aircraft with 38 BusinessFirst seats and 204 Coach seats, but it intends to substitute B-767 or B-777 aircraft in the future to tailor capacity to demand as the route develops, additional aircraft are delivered to Continental and DC-10-30 aircraft are phased out of Continental's fleet. Continental currently does not plan to display the code of any Argentine carriers on its flights on this route.

3. Continental plans to operate daily, year-round Houston-Buenos Aires service beginning June 1, 2001, or 120 days after receipt of all necessary government authority, whichever is later. Continental initially will offer daily, nonstop Houston-Buenos Aires service using Continental's DC-10-30 aircraft with 38 BusinessFirst seats and 204 Coach seats, but it intends to substitute B-767 or B-777 aircraft in the future to tailor capacity to demand as the route develops, additional aircraft are delivered to Continental and DC-10-30 aircraft are phased out of Continental's fleet. Continental currently does not plan to display the code of any Argentine carriers on its flights on this route.

---

(...continued)

<sup>1</sup> Common names are used for airlines.

For the foregoing reasons, Continental urges the Department to grant its application, as amended, for a certificate and a frequency allocation to offer daily, nonstop Newark-Buenos Aires service in 2000 and Houston-Buenos Aires service in 2001.

Respectfully submitted,

CROWELL & MORING LLP

---

R. Bruce Keiner, Jr.  
rkeiner@cromor.com

---

Michael R. Finley  
mfinley@cromor.com

Counsel for  
Continental Airlines, Inc.

September 22, 1999

CERTIFICATE OF SERVICE

I certify that I have this date served a copy of the foregoing document upon  
the following persons, in accordance with the Department's Rules of Practice:

Richard M. Vacar  
Director  
Department of Aviation  
City of Houston  
16930 John F. Kennedy Blvd.  
Houston, TX 77032

C. Hardy Acres  
Manager, Airport  
Department of Aviation  
George Bush International Airport  
P.O. Box 60106  
Houston, TX 77205

Ms. Susan Baer  
General Manager  
Newark International Airport  
Tower Road, Building 10  
Newark, NJ 07114

Robert E. Boyle  
Executive Director  
Port Authority of New York and New  
Jersey  
One World Trade Center, 65N  
New York, NY 10048

Allan W. Markham  
Allan W. Markham, PC  
2733 36<sup>th</sup> Street, N.W.  
Washington, DC 20007  
(for Arrow)

Carl B. Nelson, Jr.  
Associate General Counsel  
American Airlines, Inc.  
1101 17<sup>th</sup> Street, N.W., Suite 600  
Washington, DC 20036

William H. Callaway, Jr.  
Zuckert, Scoutt & Rasenberger, L.L.P.  
888 Seventeenth Street, N.W.  
Washington, DC 20006  
(for Challenge)

Robert E. Cohn  
Alexander Van der Bellen  
Shaw Pittman  
2300 N Street, N.W.  
Washington, DC 20037  
(for Delta)  
(by facsimile)

Nathaniel P. Breed, Jr.  
Shaw Pittman  
2300 N Street, N.W.  
Washington, DC 20037  
(for Federal Express)

Marshall S. Sinick  
Squire, Sanders & Dempsey L.L.P.  
1201 Pennsylvania Avenue, N.W.  
Suite 500  
Washington, DC 20004  
(for Florida West)

Amendment to Application of Continental  
Page 5

Jeffrey A. Manley  
Bruce H. Rabinovitz  
Kirkland & Ellis  
655 Fifteenth Street, N.W.  
Suite 1200  
Washington, DC 20005  
(for Polar and United)

September 22, 1999

---

Michael R. Finley

[1654205]