

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

**1999 U.S.-ARGENTINA COMBINATION
SERVICE CASE**

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:
: **Docket OST-99-6210**
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**BRIEF OF
THE GEORGIA AND ATLANTA PARTIES
TO THE DEPARTMENT'S DECISIONMAKER**

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March 6, 2000

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I. INTRODUCTION AND SUMMARY OF ARGUMENT

The Georgia and Atlanta Parties¹ hereby submit their Brief to the Decisionmaker of the Department of Transportation (the Department) in strong support of the application by Delta Air Lines, Inc. (Delta) for U.S.-Argentina certificate authority and an allocation of seven Phase 1 frequencies to enable Delta to provide critically-needed new daily nonstop service between Atlanta and Buenos Aires.²

¹ The Georgia and Atlanta Parties include the State of Georgia, the City of Atlanta, Hartsfield Atlanta International Airport, and the Metro Atlanta Chamber of Commerce.

² In the event that the Department does not award Delta seven Phase 1 frequencies which become available on September 1, 2000, the Georgia and Atlanta Parties strongly support Delta's fall-back alternative application for the allocation of seven Phase 2 frequencies for Atlanta-Buenos Aires service.

This proceeding is of particularly great importance to travelers and shippers in the Greater Atlanta Metropolitan Area who presently lack convenient and direct daily nonstop service to Argentina, which is one of Georgia's most significant and fast-growing international markets. The selection of Delta's Atlanta-Buenos Aires proposal will also bring about a substantial improvement in online service to Argentina from points throughout the extensive catchment area behind Atlanta which receives frequent and convenient nonstop service by Delta to and from Delta's massive Atlanta hub.

The selection of Delta's Atlanta-Buenos Aires service proposal will establish high-quality daily nonstop service between Argentina and Atlanta, which is the largest airport hub in the United States without daily nonstop service to Buenos Aires. As a direct result of Delta's extensive flight network at its preeminent Atlanta hub, that service will provide new and improved online service to Argentina from points throughout the Southeastern, Midwest and Northern Tier regions of the United States, as illustrated by the following map.

[insert map]

That route network will enable Delta to serve and develop the strong and dynamic community of interest between Argentina and the fast-growing Southeastern region which has been hindered by the lack of daily nonstop service between Atlanta and Buenos Aires.

The selection of Delta's Atlanta-Buenos Aires service proposal – and only selection of the Delta/Atlanta proposal -- will produce far and away the maximum public benefits available in this case, and will bring about an immediate strengthening of the overall market structure and level of competition in air services between the United States and Argentina.

Delta's Atlanta-Buenos Aires service will benefit more passengers and air cargo shippers, and will serve more U.S. cities with less circuitry, than the service of any other applicant at any other gateway city in this case. Delta's vast flight network at its massive Atlanta hub will permit single-carrier online service to Argentina from 182 U.S. cities, and will provide first U.S.-flag single-connection service between Argentina and 44 U.S. cities, and first competitive U.S.-flag single-connection service to 45 additional U.S. cities. Neither of the other two applicants can match the unsurpassed scope of online service and competitive benefits to Argentina travelers and shippers which Delta will offer from its Atlanta hub.

A particularly important public benefit attribute of Delta's service, which derives directly from Atlanta's optimum geographic location as a gateway for traffic flowing to and from Argentina, is Delta's ability to provide service between

Buenos Aires and 113 cities behind Atlanta with routing circuitry of 15 percent or less. By contrast, Delta's Atlanta service will serve 77 more cities behind Atlanta with less circuitry than Continental's primary Newark-Buenos Aires proposal, 70 more cities with less circuitry than Continental's Phase 2 Houston proposal, and 80 more cities with less circuitry than United's proposed Los Angeles-Buenos Aires service.

By every measure of service quality and geographic scope, public convenience, maximization of public benefits, enhanced inter-carrier and inter-gateway competition, and international market promotional ability, Delta's Atlanta-Buenos Aires service proposal is far superior to that of any other applicant. The Georgia and Atlanta Parties urge the Department to achieve those superior public benefits by granting Delta's Atlanta-Buenos Aires application for the Phase 1 award of new U.S.-Argentina frequencies in this case.

II. THE DECISIONAL OBJECTIVES ESTABLISHED FOR THIS CASE STRONGLY FAVOR THE AUTHORIZATION OF DELTA'S PROPOSED ATLANTA-BUENOS AIRES SERVICE OVER ANY OF THE OTHER SERVICE PROPOSALS AT ISSUE

In Order 99-11-14, served November 24, 1999, by which the Department instituted this proceeding, the Department identified three primary decisional objectives which will govern the selection of carrier service and gateway proposals in this case, as follows:

- "...our principal objective will be to maximize the public benefits that will result from an award of authority in this case."

- “...we will consider which applicants will be most likely to offer and maintain the best service for the traveling and shipping public.”
- “We will also consider the effects of the applicants’ service proposals on the overall market structure and the level of competition in the U.S.-Argentina market, and any other market shown to be relevant.”

(Order 99-11-14, p. 4)

In numerous prior international carrier-selection cases in which the Department has established the same or similar decisional objectives,³ the Department has found the following factors to be of paramount importance to its carrier/gateway selection decision:

- The ability of the selected carrier to carry the greatest number of passengers in the primary market and behind-gateway markets (1997 Chile, O. 97-11-27, p. 5, 1998 Brazil, O. 98-12-33, p. 8, 1999 Italy, O. 99-2-27, p. 4-6).
- The ability of the selected carrier to provide the broadest array of new or improved online services to the greatest number of points behind the primary gateway as a result of its existing route network (1997 Chile, *id.* at 5, 1998 Brazil, *id.* at 5-6, 1999 Italy, *id.* at 4, 6).
- The ability of the selected carrier/gateway combination to bring service to a new gateway, or to bring new or improved online behind-gateway service to an underserved region of the United States (1998 Brazil, *id.* at 8, 1999 Italy, *id.* at 4-6).

³ See, e.g., 1999 U.S.-Italy, Order 99-2-27, Feb. 23, 1999, and Order 99-4-21, May 4, 1999; 1998 U.S.-Brazil, Order 98-12-33, Dec. 29, 1998, and Order 99-3-26, March 30, 1999; 1997 U.S.-Chile, Order 97-11-27, Nov. 14, 1997, and Order 98-1-22, Jan. 29, 1998; 1998 U.S.-Japan, Order 98-3-15, March 16, 1998, and Order 98-5-17, May 18, 1998.

- The degree to which selection of a carrier and gateway will bring about enhanced intercarrier or intergateway competition between the U.S. and the foreign country at issue (1998 Japan, id. at 9, 1997 Chile, id. at 5, 1998 Brazil, id. at 8, 1999 Italy, id. at 5).
- The ability of the selected carrier to commence service promptly and fully utilize the authority awarded (1998 Japan, O. 98-3-15, at 7).

As discussed in the following section, the Delta/Atlanta service proposal merits selection for a Phase 1 award in this proceeding under each of the principal decisional objectives established in this case, and under a long and consistent line of Department precedents in similar international route proceedings.

Conversely, selection of either United or Continental would substantially forfeit the service and market structure benefits attainable in this case, and would be flagrantly inconsistent with long-established Department precedent. Thus, as discussed below, the selection of either United or Continental would not only result in far fewer public benefits to travelers and shippers between the U.S. and Argentina, but would also worsen the competitive structure in that market.

The public benefits attainable by selection of either Continental's Phase 1 Newark proposal or its Phase 2 Houston proposal pale in comparison to Delta's Atlanta service. Moreover, Continental's history of failing to fully utilize its allocated frequencies in U.S.-South America markets suggests that Continental would not be a vigorous and effective competitor to American and United in the U.S.-Argentina market.

United is already an entrenched incumbent in the U.S.-Argentina market, holding an allocation of 21 weekly frequencies, amounting to half of the total of 42 frequencies currently available to U.S. carriers, and United operates more than half of the total U.S.-flag capacity between the U.S. and Argentina. Grant of a Phase 1 frequency allocation to United would exclude a third U.S.-flag competitor to Argentina for at least a year and would substantially reinforce United's already-dominant position in the U.S.-Argentina market. That damage to the U.S.-Argentina competitive market structure cannot be justified by the relatively limited public benefits attainable through United's Los Angeles-Buenos Aires proposal.

III. THE SELECTION OF DELTA'S ATLANTA-BUENOS AIRES SERVICE PROPOSAL WILL MAXIMIZE THE ATTAINABLE PUBLIC BENEFITS IN THIS CASE

A. The Greater Atlanta Metropolitan Area Has A Substantial Need For Direct Service To Argentina

The City of Atlanta and the State of Georgia are the principal immediate beneficiaries of Delta's Atlanta-Buenos Aires proposed daily nonstop service, and of Delta's very large and growing hub and spokes flight network at Hartsfield Atlanta International Airport.

Delta and its Delta Connection carriers operate more than 900 daily departures at Atlanta, providing nonstop service to 160 destinations in the United States (Exhibits DL-132, ATL-R-107, R-108). That volume and scope of service, together with the operations of 29 other carriers serving Atlanta, made Atlanta the

most active airport in the world in total passengers handled and second only to Chicago O'Hare in total flight operations in 1998 (Exhibit ATL-201).

There is no question that Hartsfield Atlanta International Airport is exceptionally well-equipped to handle the dramatically increased volumes of international passengers and cargo traffic which the grant of Delta's Atlanta-Buenos Aires application will generate (see Exhibits DL-300 through 302). Hartsfield Atlanta currently has four parallel runways and 24 international gates (out of a total of 170 gates), and is now embarked on a multi-billion dollar project to add a fifth runway and expanded terminal and cargo-handling capacity (Exhibit ATL-100, pp. 2-3, ATL-200, pp. 3-4). No other gateway airport proposed in this case is better able to handle increasing volumes of U.S.-Argentina traffic with efficiency and convenience than Hartsfield Atlanta – the crown jewel on Delta's extraordinary route network.

Atlanta is the largest city in the Southeast, which is now the most dynamic and rapidly-growing region in the United States (Exhibit ATL-808). In particular, Atlanta and the Southeast region are growing faster than any other gateway/region at issue in this case in terms of population, labor force and employment growth, personal income, productivity and other indicia of burgeoning economic vitality (Exhibits ATL-801 through 808, ATL-R-101 through R-106).

Of particular significance to this proceeding, the Metropolitan Atlanta area has become a magnet for international business development (Exhibits ATL-704 through 708), and a major U.S. gateway for international trade and tourism, with

more than a 10-fold increase in international passenger traffic at Hartsfield Atlanta International Airport between 1978 and 1998 (Exhibit ATL-207). In 1998, the State of Georgia generated nearly \$190 million in exports to Argentina, and a large and fast-growing number of businesses in the Georgia and Southeast region of the U.S. have an active and growing business presence in Argentina (Exhibits ATL-900 through 902). The scope of the existing and potential community of interest between Argentina and the area served by Delta through Atlanta is emphatically demonstrated by over one hundred letters from civic and business leaders expressing strong support for Delta's proposed Atlanta-Buenos Aires service (Exhibit ATL-R-114, DL-700). That existing community of economic, political, cultural and tourism connections between the Southeast region and Argentina is certain to expand exponentially with the advent of daily nonstop service by Delta between Atlanta and Buenos Aires.

Delta's Vast Route Network At Hartsfield Atlanta International Airport Will Provide Extensive and Convenient On-Line Connections To Argentina From Points Throughout The Southeast/Midwest/Northern Tier Regions of the United States

Delta's substantial complex of nonstop flights centered on its largest hub at Hartsfield Atlanta International Airport will bring online service to Argentina from 182 U.S. cities in the large catchment area served through Atlanta (Exhibit DL-201). Atlanta is the largest hub city in the United States without daily nonstop service to Buenos Aires, and the Southeast, Midwest and Northern Tier regions

served through Atlanta are served by more Delta flights to Atlanta than any of the other carrier/gateway regions at issue (Exhibit ATL-R-107, 108).

Delta's Atlanta-Buenos Aires service will provide substantial new service benefits, including the first online connecting service to Argentina from 44 U.S. cities (Exhibit DL-202), and the first competitive single connection service to 45 additional U.S. cities (Exhibit DL-203). Based on the quality and stimulative impact of those improved services, and Delta's well-established market promotion capabilities, Delta projects that its Atlanta-Buenos Aires operations will generate 151,810 passengers in the first forecast year, based on Delta's conservative forecasting methodology (Exhibit DL-300 through 304), and Delta's established record of success in promoting long-haul international markets from Atlanta (Exhibit DL-305).

A particular advantage of Atlanta's geographic location and Delta's vast Atlanta flight network is the ability of Delta to provide single-carrier service between Buenos Aires and 113 U.S. cities behind Atlanta with routing circuitry of 15 percent or less (Exhibit ATL-R-110). Delta's manifest superiority over the other applicants on the basis of that measure of convenience and optimum travel times is demonstrated by the fact that: (1) Delta will serve 77 more cities behind Atlanta with 15 percent or less circuitry to Buenos Aires than Continental's Newark-Buenos Aires service (Exhibit ATL-R-111), (2) Delta will serve 70 more cities with 15 percent or less circuitry than Continental's Houston-Buenos Aires service (Exhibit ATL-R-112), and (3) Delta will serve a total of 80 more cities

with 15 percent or less circuitry than United's Los Angeles-Buenos Aires service (ATL-R-113).

IV. DELTA WILL OFFER AND MAINTAIN THE HIGHEST QUALITY OF SERVICE BETWEEN ATLANTA AND BUENOS AIRES

One of the principal decisional objectives identified by the Department in this case is to select the carrier applicant which "will be most likely to offer and maintain the best service for the traveling and shipping public" (Order 99-11-14, p. 4).

The quality and scope of Delta's service is best demonstrated by the unmatched scope and quality of public benefits which Delta's service will provide, as discussed in the preceding section. Delta's commitment and incentive to maintain the highest level of service between its Atlanta hub and Buenos Aires is beyond even the most remote doubt.

In comparison to the quantity and quality of Argentina service offered by the other two applicants, Delta will operate 71,000 more annual seats than Continental will provide under its primary Newark proposal, and will carry and benefit 55,000 more annual passengers than will Continental at Newark (Exhibits DL-R-101 and 102). Even more striking, Delta's extraordinary Atlanta flight network will enable Delta to benefit 96,000 more behind-gateway passengers, and will serve 141 more behind-gateway cities, than will Continental at Newark (Exhibits DL-R-103 and 104). Delta's Atlanta service will provide first one-stop online service to Buenos Aires from 44 U.S. cities, while Continental's Newark

service will provide no new one-stop online service (Exhibit DL-R-105). As discussed previously, Atlanta's ideal geographic location will enable Delta to serve far more behind-gateway cities with far less circuitry to Buenos Aires than the Newark, Houston and Los Angeles gateway proposals advanced by Continental and United.

In comparison to Continental's Phase 2 Houston gateway proposal, Delta's Atlanta service will carry 58,000 more annual passengers, with 71,000 more annual seats, serving 137 more behind-gateway cities, and benefitting 71,000 more behind-gateway passengers, than Continental (Exhibits DL-R-129 through 133).

A comparison to United's Los Angeles gateway proposal is complicated by the substantially inflated character of United's traffic forecast and self-diverted traffic (Exhibits DL-R-201, 203 through 205, 207). It is clear, however, that Delta will benefit 42,000 more annual passengers (after adjustment for United's self-diverted traffic), 100,000 more behind-gateway passengers, serving 132 more behind-gateway cities, and providing first one-stop online service to 26 more U.S. points, all with far less circuitry, than United's Los Angeles-Buenos Aires proposal (Exhibits DL-R-206 through 212).

Delta's ability to produce those substantial behind-gateway benefits, and the absolute certainty that Delta will maintain that high level of service, is based on Delta's very large and efficient flight network at its Atlanta hub. Hartsfield Atlanta International Airport is the largest flight operations hub on Delta's nationwide route system, with over 900 daily departures to 160 nonstop

destinations throughout the U.S. (Exhibit ATL-R-107, 108). Delta has 80 gate positions on four dedicated concourses at Hartsfield Airport, with an additional 14 common-use gates on a fifth concourse (Exhibit DL-403).

Delta's proposed Atlanta-Buenos Aires service will be operated seven days a week utilizing Delta's state-of-the-art MD-11 aircraft, configured to carry 268 passengers (50 Business, 218 Coach) and offering evening departures and early-morning arrivals in both directions (Exhibits DL-101, DL-400). Delta's Atlanta-Buenos Aires service will provide online service between Argentina and 182 points in the U.S., including first one-stop online service to 44 U.S. points, first competitive one-stop online service to 45 U.S. points, and first online service to 36 additional U.S. points (Exhibits D-201 through DL-204). In addition, Delta's MD-11 aircraft will offer a substantial amount of belly-freight capacity on daily services to Argentina (Exhibit DL-400), making additional air express and air freight capacity available to meet the burgeoning demand for air cargo service to Argentina resulting from the increase trade and economic ties between Argentina and the region served through Delta's Atlanta hub (Exhibits DL-153 through DL-155).

Delta's strong commitment to developing a major long-term presence in Argentina and South America (Exhibit DL-T-1, pp. 1-2, 9-10), together with Delta's financial strength and operating efficiency (Delta Form 41; Schedule P-1 report; CY 1998), and Delta's proven track record of success in developing international services from Atlanta and its other U.S. hub cities (Exhibit DL-305),

all combine to provide the highest degree of assurance that Delta is the one applicant which is “most likely to offer and maintain” the highest quality of service for the traveling and shipping public between the U.S. and Argentina.

V. THE SELECTION OF DELTA’S ATLANTA-BUENOS AIRES SERVICE PROPOSAL WILL PROVIDE THE MAXIMUM MARKET STRUCTURE AND COMPETITIVE BENEFITS

At the present time, U.S.-flag service in the U.S.-Argentina market is dominated by two major carriers, American and United, whose existing Argentina service is concentrated in three major gateway cities, New York, Miami and Chicago, leaving many U.S. cities without direct and convenient single-plane and on-line connecting service to Argentina.

The selection of Delta’s Atlanta-Buenos Aires service proposal will bring about an immediate quantum improvement in the geographical scope and convenience of U.S.-Argentina service, while injecting Delta as a vigorous and effective new competitor in the U.S.-Argentina inter-carrier and inter-gateway competitive arenas.

Delta’s massive hub network at Atlanta provides the opportunity to achieve substantially improved online single-connection service with minimal circuitry between Argentina and the Southeast, Midwest and Northern Tier regions of the United States which now largely lack that service. Delta’s Atlanta-Buenos Aires proposal will provide more service to more U.S. cities with less circuitry than the

Los Angeles gateway service proposed by United and either the Newark or Houston gateway proposals advanced by Continental.

The selection of either United or Continental for a Phase 1 award is also diametrically inconsistent with the Department's stated objectives of making an award which will improve the "overall market structure" and enhance the "level of competition" in the U.S.-Argentina market. United is one of only two U.S.-flag carriers currently authorized to serve the U.S.-Argentina combination-service market, and already holds an allocation of one-half the total U.S.-Argentina combination service frequencies available to U.S. carriers. An award to United would increase its existing dominant position in the U.S.-Argentina market and effectively reduce the level of potential competition in the market.

An award to Continental would provide 20,000 fewer annual seats in the U.S.-Argentina market than Delta (Exhibit DL-180), and would forfeit the substantial public benefits and overall market structure improvements which are available only through the selection and implementation of Delta's Atlanta-Buenos Aires service. Moreover, it is clear from the respective track records of Delta and Continental in promoting and developing international routes that Delta would be a far more effective competitor against American and United in the U.S.-Argentina market than Continental, which has failed to fully utilize its existing Brazil and Chile frequency allocations (Exhibits DL-174, DL-178).

For all of the foregoing reasons, the selection of Delta's Atlanta-Buenos Aires service proposal will have a far more beneficial impact "on the overall

market structure and the level of competition in the U.S.-Argentina market” than the selection of either Continental or United.

VI. CONCLUSION

The selection of Delta’s Atlanta-Buenos Aires service proposal will achieve each of the Department’s announced decisional objectives in this case, and will maximize both the attainable public benefits and the optimum use of the valuable U.S.-Argentina authority at issue.

On the basis of the overwhelming evidence of record favoring Delta’s selection, and for the reasons set forth in this Brief, the Georgia and Atlanta Parties urge the Department to grant Delta’s Application for U.S.-Argentina certificate authority, and for the Phase 1 allocation of seven (7) weekly U.S.-Argentina frequencies to Delta, in this proceeding.

Respectfully submitted,

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PARTIES**

CERTIFICATE OF SERVICE

I hereby certify that I have this day served a copy of the foregoing Brief by messenger, telecopier transmission, or United States mail, properly addressed and with postage prepaid, upon all persons listed in the attached Service List.

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Washington, D.C.
March 6, 2000

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