

BEFORE THE  
DEPARTMENT OF TRANSPORTATION  
WASHINGTON, D.C.

Application of	)	
	)	
<b>DELTA AIR LINES, INC.</b>	)	
	)	
for exemptions from Subparts K and S of	)	Docket OST-00-7118
14 C.F.R. Part 93 pursuant to 49 U.S.C. § 41718	)	
("beyond perimeter" slot exemptions)	)	
Washington, D.C. (DCA) – Salt Lake City, Utah	)	
	)	

**ANSWER OF  
THE UTAH AND SALT LAKE CITY PARTIES**

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April 5, 2000

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Pursuant to Rule 307 of the Rules of Practice of the Department of Transportation (the Department), the Utah Air Travel Commission and the Salt Lake City Corporation<sup>1</sup> (hereinafter referred to as the "Utah and Salt Lake City Parties" or as "Salt Lake City") hereby submit their Answer in strong support of the Application of Delta Air Lines, Inc. ("Delta") for certain exemptions from 49 U.S.C. §§ 49104(a)(5), 49109, 49111(e) and 41714, and Subparts K and S of 14 C.F.R. Part 93 (the "High Density Rule"), to allow Delta to operate two daily nonstop roundtrip flights between Ronald Reagan Washington National Airport ("DCA" or

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<sup>1</sup> The Utah Air Travel Commission is an 18-member board consisting of the State of Utah Department of Transportation, the City of Salt Lake City, and the Great Salt Lake Area Chamber of Commerce. The Salt Lake City Corporation is a governmental authority which owns, and through the Salt Lake City Department of Airports, operates Salt Lake City International Airport and two reliever airports in the Salt Lake City area.

“Reagan National” and Salt Lake City, Utah (“SLC”) using four (4) of the twelve (12) slot exemptions for service beyond the DCA perimeter created under the newly-enacted Section § 41718 of the Transportation Code (49 U.S.C. § 41718).

For all of the reasons cited by Delta in its Application, the Utah and Salt Lake City Parties submit that the allocation of four (4) “beyond-perimeter” DCA operating slots to Delta, in order to enable Delta to operate two nonstop roundtrip flights a day between DCA and SLC, is clearly supported by the public interest, and will maximize the public benefits attainable through the utilization of those newly-created operating slots.

In particular, Delta’s establishment of twice-daily nonstop service between Reagan National and Delta’s substantial operating hub at Salt Lake City will bring about convenient and competitive on-line service between the Nation’s Capital and over 40 cities in the western United States, including dozens of small and medium-sized communities which receive nonstop service by Delta to and from its major Salt Lake City hub. In addition, Delta’s establishment of well-timed nonstop service with its state-of-the-art 183-seat Boeing B-757 aircraft between Salt Lake City and Reagan National will substantially improve the convenience of service for thousands of annual local O&D passengers between Washington, D.C. and one of the largest and fastest-growing cities and regions in the western United States.

Delta’s proposed service will abundantly satisfy each of the policy objectives and decisional criteria established by Congress to govern the allocation of

newly-created DCA beyond-perimeter slots by the Department. Thus, grant of Delta's application clearly will "provide . . . domestic network benefits in [beyond-perimeter] areas", "increase competition by new entrant air carriers [and] in multiple markets", "not reduce travel options for communities . . . within the perimeter", and "not result in meaningfully increased travel delays" (see, AIR-21, Section 231(e), adding a new Section 41718 establishing special rules for Ronald Reagan Washington National Airport).

The AIR-21 legislation passed by Congress on March 15, 2000 became formally enacted into law on April 5, 2000, and, therefore, the time deadlines for submission of DCA slot applications and answers to such applications established in AIR-21 have just now begun to run. The Utah and Salt Lake City Parties intend to submit a more comprehensive Consolidated Answer to all applications for beyond-perimeter slots at Reagan National after all applicants for such authority have filed their applications with the Department.

In the event that no other applications for DCA beyond-perimeter slots are filed within the statutory deadline,<sup>2</sup> the Utah and Salt Lake City Parties urge the Department to grant Delta's application immediately, without awaiting the deadline for decision established by AIR-21.

WHEREFORE, the Utah and Salt Lake City Parties urge the Department to

issue an Order allocating four (4) “beyond-perimeter” DCA operating slots to Delta for an indefinite period of time.

Respectfully submitted,

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PARTIES

**CERTIFICATE OF SERVICE**

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

\_\_\_\_\_  
Doreen S. Hughes

Washington, D.C.  
April 5, 2000

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Footnote continued from previous page

<sup>2</sup> At this time, only one other application for beyond-perimeter slots at DCA has been filed, and the two pending applications request fewer than the total of twelve (12) new slots available for allocation.



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