

BEFORE THE
DEPARTMENT OF TRANSPORTATION
WASHINGTON, D.C.

Application of)	
)	
DELTA AIR LINES, INC.)	
)	Docket No. OST-96-1402
For renewal of frequency allocation)	
(U.S.-Ukraine))	
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Application of)	
)	
AMERICAN AIRLINES, INC.)	Docket No. OST-00-7228
)	
Under 49 U.S.C. § 40109 for an exemption)	
(U.S.-Ukraine and route integration))	
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Application of)	
)	
AMERICAN AIRLINES, INC.)	
)	Docket No. OST-00-7227
For U.S.-Ukraine codeshare designation and)	
allocation of frequencies (services with Swissair))	

**CONSOLIDATED RESPONSE OF
DELTA AIR LINES, INC.**

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April 19, 2000

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**CONSOLIDATED RESPONSE OF
DELTA AIR LINES, INC.**

Delta Air Lines, Inc. ("Delta") hereby submits this Consolidated Response to the Applications and Answer of American Airlines, Inc. ("American") concerning U.S.-Ukraine codesharing in the above-captioned dockets. Delta takes no position on whether American should be awarded the dormant TWA codeshare authority to conduct its proposed services with Swissair. However, to the extent American seeks to usurp Delta's existing and

approved Ukraine codeshare authority, which the Department has already authorized Delta to conduct with Air France, Delta opposes American's application.

Contrary to American's assertions, there are no currently pending competing applications with respect to Delta's Ukraine codeshare services that would raise Ashbacker concerns. Delta notified the Department on February 17, 2000, that Delta would be transferring certain of its limited-entry codeshare service from Swissair to Air France-operated flights. Neither American nor any other carrier submitted comments or competing applications for Ukraine codeshare services.

On March 23, 2000, the Department confirmed its approval of the Delta/Air France Ukraine codeshare services, as shown in Attachment A. Not only are the current Delta/Air France codeshare services approved by the Department, but the Air France services will be a continuation of a long-established Delta codeshare service. In these circumstances, neither American's codeshare designation application nor its frequency request are "competing with" or "mutually exclusive" to Delta's existing and duly-authorized service.

Respectfully submitted,

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CERTIFICATE OF SERVICE

I hereby certify that I have this 19th day of April, 2000, served the foregoing Consolidated Response of Delta Air Lines, Inc., upon each person listed below via first class mail, postage prepaid.

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