

**BEFORE THE  
DEPARTMENT OF TRANSPORTATION  
WASHINGTON, D.C.**

\_\_\_\_\_) )  
**U.S.-VIETNAM THIRD-COUNTY CODESHARING ) Docket OST-2000-7194**  
**OPPORTUNITIES )**  
\_\_\_\_\_) )

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

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**April 14, 2000**

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

Delta Air Lines, Inc. ("Delta") hereby submits this Consolidated Answer to the Applications of American, United, and Northwest for Vietnam codeshare services. With three designation opportunities and four interested carriers, the Department need only eliminate the weakest applicant.

By any measure, Delta's request to provide daily service to Vietnam from nine nonstop U.S. gateways is one of the strongest proposals, and should receive first priority for an award. Delta is one of just two applicant carriers that would provide daily or better service to Vietnam, and Delta is one of only three applicants that would provide service to both of Vietnam's primary cities: Ho Chi Minh City and Hanoi.

American has submitted the weakest service proposal of any applicant. American would offer just three weekly third-country codeshare flights, and would serve only Ho Chi Minh City, whereas Delta would serve both Ho Chi Minh City and Hanoi. Accordingly, Delta

will provide U.S.-Vietnam travelers substantially greater schedule and destination choices than American.

Delta's services are also markedly superior to Northwest's. In contrast to the nine nonstop U.S. gateways proposed by Delta, Northwest would offer services from just two. In third-country codeshare cases, the Department has determined that one of the primary decisional factors is the number of nonstop gateways proposed by the applicant. See, e.g., Order 99-3-29 at 3, Order 97-7-8 at 4-5, Order 96-7-37 at 5. Not only does Delta offer nearly five times more gateways than Northwest, but Delta will offer daily service, making more effective use of the valuable designation opportunity than Northwest's six weekly flights. Northwest's Detroit-originating passengers must endure two aircraft changes, while Delta passengers will enjoy the convenience of single-plane Vietnam service after making connections from all nine of Delta's nonstop U.S. gateways.

Detroit passengers would be unable to make same-day Vietnam connections in either direction, and Los Angeles passengers would have only irregular same-day connection availability. (See Table 2). In contrast, passengers from all nine nonstop Delta gateways would enjoy same-day connections both to and from Vietnam. Id.

United's proposal suffers from defects similar to Northwest's. United offers service from just six gateways to Delta's nine, and passengers from five of United's six gateways would have to make double connections, at Tokyo and Bangkok. United's Pacific schedules are also poorly timed for Vietnam service, and the potential for same-day round-trip connections exists

at only two of United's U.S. gateways, as opposed to nine for Delta. Id. Accordingly, Delta should receive higher priority than United for an award of Vietnam authority.

WHEREFORE, for the foregoing reasons, Delta urges the Department to award Delta a designation and seven frequencies to conduct U.S.-Vietnam third-country codeshare services.

Respectfully submitted,

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**Table 1**

**Vietnam Service Summaries**

| <b><u>Carrier</u></b> | <b><u>U.S. Gateways</u></b>   | <b><u>via</u></b>   | <b><u>Third-Country Partner Gateway</u></b> | <b><u>via</u></b>    | <b><u>Vietnam Points</u></b>         | <b><u>Freqs.</u></b> |
|-----------------------|---|---|---|----------------------|--------------------------------------|----------------------|
| Delta                 | Atlanta<br>Boston<br>Chicago<br>Cincinnati<br>Los Angeles<br>New York (JFK)<br>Philadelphia<br>San Francisco<br>Washington          | nonstop<br>nonstop<br>nonstop<br>nonstop<br>nonstop<br>nonstop<br>nonstop<br>nonstop<br>nonstop                     | Paris                                       | Singapore<br>Bangkok | Ho Chi Minh City<br>Hanoi            | 4<br>3               |
| United                | Seattle<br>Los Angeles<br>San Francisco<br>Chicago<br>Honolulu<br>New York (JFK)  | Tokyo<br>Tokyo (connection)<br>Tokyo (connection)<br>Tokyo (connection)<br>Tokyo (connection)<br>Tokyo (connection) | Bangkok                                     | nonstop              | Ho Chi Minh City<br>Hanoi<br>Da Nang | 7<br>4<br>3          |
| Northwest             | Los Angeles<br>Detroit  | Tokyo or Taipei<br>Osaka (chg of gauge)   | Kuala Lumpur                                | nonstop              | Ho Chi Minh City<br>Hanoi            | 4<br>2               |
| American              | Atlanta<br>Boston<br>Chicago<br>Dallas/Ft. Worth<br>Miami<br>Los Angeles<br>New York (JFK)<br>Newark<br>San Francisco<br>Washington | nonstop<br>nonstop<br>nonstop<br>nonstop<br>nonstop<br>nonstop<br>nonstop<br>nonstop<br>nonstop<br>nonstop          | Zurich                                      | Singapore            | Ho Chi Minh City                     | 3                    |

**U.S. Gateways and Same-Day Connections**

**I. Atlantic Routings**

**A. Delta**

| U.S. Gateway     | Same Day Connections to/from SGN? |                  | Same Day Connections to/from HAN? |                  |
|------------------|-----------------------------------|------------------|-----------------------------------|------------------|
|                  | <u>Eastbound</u>                  | <u>Westbound</u> | <u>Eastbound</u>                  | <u>Westbound</u> |
| Atlanta          | Yes                               | Yes              | Yes                               | Yes              |
| Boston           | Yes                               | Yes              | Yes                               | Yes              |
| Chicago          | Yes                               | Yes              | Yes                               | Yes              |
| Cincinnati       | Yes                               | Yes              | Yes                               | Yes              |
| Los Angeles      | Yes                               | Yes              | Yes                               | Yes              |
| New York         | Yes                               | Yes              | Yes                               | Yes              |
| Philadelphia     | Yes                               | Yes              | Yes                               | Yes              |
| San Francisco    | Yes                               | Yes              | Yes                               | Yes              |
| Washington, D.C. | Yes                               | Yes              | Yes                               | Yes              |

**B. American**

| U.S. Gateway                  | Same Day Connections to/from SGN? |                  | Same Day Connections to/from HAN? |                  |
|-------------------------------|-----------------------------------|------------------|-----------------------------------|------------------|
|                               | <u>Eastbound</u>                  | <u>Westbound</u> | <u>Eastbound</u>                  | <u>Westbound</u> |
| Atlanta                       | Yes                               | Yes              | No service                        | No service       |
| Boston                        | Yes                               | Yes              | No service                        | No service       |
| Chicago                       | Yes                               | Yes              | No service                        | No service       |
| Dallas/Ft. Worth <sup>1</sup> | Yes                               | Yes              | No service                        | No service       |
| Los Angeles                   | Yes                               | Yes              | No service                        | No service       |
| Miami                         | Yes                               | Yes              | No service                        | No service       |
| New York/Newark               | Yes                               | Yes              | No service                        | No service       |
| San Francisco                 | Yes                               | Yes              | No service                        | No service       |
| Washington, D.C.              | Yes                               | Yes              | No service                        | No service       |

<sup>1</sup> American's Dallas/Ft. Worth-Zurich service is scheduled to commence on June 1, 2000.

**II. Pacific Routings**

**A. United**

| U.S. Gateway  | Same Day Connections to/from SGN? |                  | Same Day Connections to/from HAN? |                  | Same Day Connections to/from DAD? |                  |
|---------------|-----------------------------------|------------------|-----------------------------------|------------------|-----------------------------------|------------------|
|               | <u>Westbound</u>                  | <u>Eastbound</u> | <u>Westbound</u>                  | <u>Eastbound</u> | <u>Westbound</u>                  | <u>Eastbound</u> |
| Seattle       | No                                | No               | No                                | No               | No                                | No               |
| Los Angeles   | No                                | No               | No                                | No               | No                                | No               |
| San Francisco | No                                | No               | No                                | No               | No                                | No               |
| Chicago       | No                                | Yes              | No                                | Yes              | No                                | Yes              |
| Honolulu      | No                                | No               | No                                | No               | No                                | No               |
| New York      | No                                | Yes              | No                                | Yes              | No                                | Yes              |

**B. Northwest**

| U.S. Gateway | Same Day Connections to/from SGN? |                  | Same Day Connections to/from HAN? |                  |
|--------------|-----------------------------------|------------------|-----------------------------------|------------------|
|              | <u>Westbound</u>                  | <u>Eastbound</u> | <u>Westbound</u>                  | <u>Eastbound</u> |
| Detroit      | No                                | No               | No                                | No               |
| Los Angeles  | Yes (2 per week)                  | Yes (2 per week) | Yes (2 per week)                  | No               |

CERTIFICATE OF SERVICE

I hereby certify that I have, this 14th day of April, 2000, served the foregoing Consolidated Answer of Delta Air Lines, Inc., upon those persons listed below, by depositing copies thereof in the United States mail, first class, postage prepaid.

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