

**BEFORE THE
DEPARTMENT OF TRANSPORTATION
WASHINGTON, D.C.
May 22, 2000**

Applications of)
)
)
 American Airlines, Inc.)
 American Trans Air, Inc.)
 America West Airlines, Inc.)
 Frontier Airlines, Inc.)
 National Airlines, Inc.) **Docket OST-00-7181**
 Northwest Airlines, Inc.)
 Trans World Airlines, Inc.)
 United Air Lines, Inc.)
)
 for beyond-perimeter slot exemptions at)
 Washington Reagan National Airport pursuant to)
 49 U.S.C. § 41718)
)

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

I. INTRODUCTION.

For many decades, access to the Nation’s Capitol, via its preferred close-in gateway at Washington Reagan National Airport (“DCA”), has been artificially restricted for residents of Western states by the perimeter rule. This is particularly true for the many small and medium sized communities served only through Western hub airports, that must currently endure double or even triple connections to reach National Airport.

Delta’s Salt Lake City-DCA proposal represents the most effective way to lift the DCA service restrictions and improve competitive options for the greatest number of U.S.

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communities, because Delta's application is the only proposal involving a large Western hub that has both the geographic location, as well as the scope of operations, necessary to provide improved access to DCA for large underserved regions of the Western United States.

Delta's Salt Lake City proposal is the most comprehensive and well balanced proposal of any applicant. Salt Lake City is a large and important city in its own right. However, unlike west coast cities such as Los Angeles and San Francisco, whose airports generate predominately local Washington D.C. passengers, the Salt Lake City-Washington route is characterized by a healthy mix of both local and connecting passengers.

In any comparative evaluation, Delta's application ranks at the top of the list in terms of the Department's guiding statutory approval criteria of providing "domestic network benefits in areas beyond the perimeter" and "increas[ing] competition . . . in multiple markets." 49 U.S.C. § 41718(a). This is because Delta's large Salt Lake City hub will provide unmatched coverage for large areas of the United States that lie outside the perimeter and which do not have adequate service options for travel to DCA:

- Delta will provide 33 cities outside the perimeter with effective nonstop to nonstop connections to DCA—more than any other applicant. (DL-R-101, 111-113)
- Delta will benefit 27 small and medium sized communities with nonstop to nonstop DCA service — again, more than any other applicant. (DL-R-121-125)

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- Delta will offer DCA service from the largest airline hub in the intermountain West, providing the greatest number of non-circuitous connections for the largest number of Western communities. (DL-R-114-120)
- Delta will offer service from the least-congested Western hub airport with the best on-time record of any competing carrier/gateway hub. (DL-R-129, 130)

The selection of Delta will do more to intensify domestic network competition in the Western region of the United States than any other applicant. Through its system of strategically placed hubs, Delta blankets the entire country with a comprehensive array of network services. The primary hub through which Delta serves the West is Salt Lake City. However, because of the DCA perimeter rule, Delta is artificially cut off from providing effective network coverage between DCA and the Western United States.

Whereas other applicants such as American, United, Northwest and TWA have extensive Western network coverage from their existing hubs within the perimeter (i.e. Dallas, Chicago, Minneapolis/St. Paul and St. Louis), Delta is at a serious service and competitive handicap because its Western U.S. network coverage is concentrated at Salt Lake City, which lies outside the DCA perimeter.

An award of four DCA-Salt Lake City slot exemptions to Delta will bring the strength of the largest U.S. passenger carrier to bear on improving service and competitive options for DCA travelers throughout the Western United States, and will have a greater impact on

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competition in multiple markets, and in projecting domestic network benefits to more communities beyond the perimeter, than any other applicant.

II. CALIFORNIA APPLICATIONS

American, United, TWA and American Trans Air have all applied to operate nonstop DCA services benefiting primarily local California-Washington markets that receive extremely high levels of nonstop service at other Washington area airports (16 flights a day in the case of Los Angeles and 12 flights a day for San Francisco). California's far Western location makes it poorly situated to serve as a connecting gateway for all but a handful of West Coast cities – many of which already have competitive nonstop-to-nonstop connections to DCA. Accordingly, the services proposed by the California applicants would produce relatively few network benefits.

American, United and TWA are not “new entrant” carriers. Therefore, in order to satisfy the statutory approval criteria, these carriers must demonstrate that they will “increase competition . . . in multiple markets”. See 49 U.S.C. § 41718(a)(2). However, as is quite apparent from their applications, each of these carriers is enthralled with the size of the large Los Angeles-DCA local market. Rather than “increasing competition in multiple markets” the effect of granting any one of these incumbents DCA-LAX authority would merely benefit a single local nonstop competitor. While ATA would be a “new entrant” carrier, it offers nothing in the way of domestic network benefits, as required by the statute.

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A. American

American's desire for DCA-LAX authority is motivated by its desire to gain a leg up on United in the already healthy and vigorously competitive Los Angeles-Washington local market:

For the year ended June 30, 1999, United Carried 445,140 passengers in the Los Angeles-Washington market (DCA and IAD), a 50.9% share, followed by American with 271,350, a 31.0% share . . . Granting American's request for 4 DCA exemption slots will make American a stronger competitor at Los Angeles in general, and in the Los Angeles-Washington market in particular . . .

AA Application at 4.

American does not need a hand out in this proceeding to further indulge its longtime rivalry with United. In fact, American competes very effectively with United, offering four daily nonstop flights on the Los Angeles-Washington (Dulles) route in competition with United, as well as *seventy* 1-stop DCA-LAX connections via American's Chicago O'Hare and Dallas/Ft. Worth hubs.

American would do almost nothing to "increase competition in multiple markets" as it is required to do in order to qualify for an award under the statute. Not only would American be able to offer few attractive connections from LAX, but American already operates one of the largest hubs serving the Western United States at Dallas/Ft. Worth. DFW is located within the 1,250 mile Washington perimeter, giving American DCA access and the ability to serve a host of Western cities on a nonstop-to-nonstop connecting basis, including most of the cities where American claims it will "increase competition" in this application. Providing American duplicate

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access via Los Angeles to cities such as Fresno, Palm Springs, San Jose, San Francisco, San Diego, Reno, Las Vegas and Honolulu – which American already serves via DFW – will not benefit competition or the public interest in any meaningful way.

B. United

Like American, United focuses on the “scale of the Los Angeles market” and its benefits to the large number of local passengers that travel between Washington and Los Angeles. However, United also attempts to tout the supposed network benefits of its “newest hub” at LAX.

United’s claimed network benefits are illusory. LAX, perched on the Pacific Coast, is extremely ill-suited to serve as an effective east-west connecting hub for domestic service to and from DCA. Unlike Salt Lake City, which provides comprehensive and non-circuitous coverage for the entire Western region, Los Angeles can effectively serve only a narrow sliver of communities on the west coast. DL-R-102. This is because inland Western cities must endure a 180 degree backhaul to travel to Washington via Los Angeles.

While United may indeed operate a hub at Los Angeles, the “network benefits” of the hub inure primarily to international, and not *domestic* passengers, as *required* by the statute. See 49 U.S.C. § 41718(a)(1). Los Angeles is not well suited to collect traffic moving between the Eastern and Western regions of the United States; however, United uses Los Angeles to collect traffic moving beyond the United States to Japan, the South Pacific, and up and down

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the West Coast to and from Latin America. Thus, it is not surprising that United devotes a substantial portion of its exhibits to extolling the potential link between DCA and United's "Global LAX Network" (UA-11); the new Foreign Inspection Service (FIS) facilities that have been constructed for United's benefit at LAX (UA-16); and the benefits United will provide for the "50,000 annual passengers who will travel between Washington and the South Pacific" (UA-28).

Delta submits that the express language of Air 21 to improve "*domestic network benefits in areas beyond the perimeter*" was meant to improve Washington access for *U.S. communities* to their Nation's capital, and not to improve airport options for international passengers from Auckland, Perth, and Pago Pago. See, UA-28.

Moreover, as the length of haul increases, the convenience advantage of Washington National over Dulles Airport becomes less and less relevant in the context of total travel time. On a 20 hour journey between Washington and New Zealand, the 30 minute additional drive time difference between DCA and IAD is hardly relevant. However, on trips of shorter duration, such as between communities in the Rocky Mountain West and Washington, the airport convenience advantage is decidedly more important.

Indeed, Los Angeles itself, which is a full continent away from Washington, and an hour further flying time than Salt Lake City, is already beginning to stretch the limits of convenience relevance. For passengers connecting via Los Angeles, the benefits are even more attenuated.

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Salt Lake City provides a convenient Western gateway that is still proximate enough to Washington in terms of total travel time to have meaningful benefit to the traveling public.

Finally, given that United operates over 3,200 nonstop seats a day between its Washington Dulles and Los Angeles hubs, it will continue to have strong motivation to move connecting passengers on its huge existing capacity, and reserve DCA seats for the highest paying Los Angeles-DCA local passengers, thereby further diminishing any claimed network benefits for its proposed services.

C. American Trans Air

In weighing the American Trans Air and Delta applications, the Department must compare the relative benefits of utilizing four DCA slots to benefit Salt Lake City and the 33 additional communities served by Delta beyond Salt Lake, versus ATA's proposal to serve just two discrete points in California, both of which enjoy extremely high levels of nonstop service from other Washington airports. *Compare*, DL-R-101; DL-R-105, 106.

ATA would provide no network benefits beyond the perimeter, because ATA has no viable connections to and from its proposed Los Angeles or San Francisco gateways. Thus, ATA fails to satisfy the first and most important statutory approval criterion of "provid[ing] air transportation with domestic network benefits in areas beyond the perimeter . . ." 49 U.S.C. § 41718(a)(1).

While ATA holds out the promise of improved service to Hawaii, those benefits do not

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exist in reality because travelers would have to wait more than nine hours to make connections. (ATA generously offers its passengers “free stopovers” but neglects to mention that stopovers are a practical necessity for onward travel on ATA. Application at 16.)

ATA does not need an award of beyond-perimeter slots to be an effective competitor in the California-DCA marketplace. Indeed, ATA boasts that its existing DCA-California services via Chicago Midway carry “as many as eighty passengers [per flight] destined for California.” ATA application at 4. Therefore, by its own admission, ATA’s one-stop services provide ATA with a strong and viable opportunity to compete in the DCA-California marketplace.

D. TWA

TWA’s DCA-Los Angeles proposal suffers from the same structural defects as each of the preceding applicants. Los Angeles is an exceedingly poor connecting gateway for Western U.S.-DCA traffic. Moreover, TWA currently has almost no viable connecting services at Los Angeles. Even if the Department were to accept TWA’s non-existent paper commuter feeder proposal at face value, TWA would offer *de minimis* network benefits, serving just 5 small California cities in comparison to the 33 cities in 11 states that Delta would serve on a nonstop-to-nonstop connecting basis from Salt Lake City. DL-R-101, DL-R-104.

The Department should not expend this valuable public opportunity in the way of a regulatory subsidy to TWA, when the DCA beyond-perimeter slots can be used to achieve

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much greater public interest benefits elsewhere. TWA claims that its “very survival hinges upon its ability to compete in markets that are now dominated by larger entrenched carriers.”

(Application at 2) In fact, TWA does not want to *compete* at all, but would prefer to operate on the protected DCA-Los Angeles route, where it is effectively insulated from competition.

The ostensible purpose of Air 21 was not to “revitalize” aging carriers nor to “ensure [TWA’s] long-term profitability” by awarding it protected monopoly routes. TWA Application at 11.

Rather, the clear and express purpose of Air 21 was to *increase competition and domestic network benefits*. On that score, TWA’s application is seriously lacking.

Moreover, TWA operates a large east-west hub located within the DCA perimeter at St. Louis. In fact, on many occasions, including the three consecutive U.S.-Toronto route proceedings, TWA has touted the effectiveness of St. Louis as a highly desirable gateway for service to the Western regions of the United States. See, Briefs of TWA, Dockets OST-96-1538, 95-782, and Docket 50168.

The stand-alone DCA-Los Angeles service TWA is proposing in this proceeding would contribute almost nothing to TWA’s beyond-perimeter *network* capability, and the blatant regulatory subsidy basis upon which TWA has appealed to the Department is not an authorized statutory approval criteria under Air 21.

III. AMERICA WEST

America West has requested ten out of the twelve available beyond-perimeter slot

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exemptions. Given the legislative context of Air 21, Delta recognizes that America West will likely receive exemption authority in this proceeding. However, essentially all of the network and competitive benefits of the America West proposal can be realized by the award of *two* round-trip frequencies to America West for service to Phoenix or Las Vegas. America West does not need and should not receive slots to operate *five* daily flights to serve duplicative and overlapping hubs in the southwest region.

To the contrary, awarding more than two frequencies to American West for Phoenix service would defeat the network-expanding and competitive benefits sought by Air 21, because the award of excess authority to America West would preclude the introduction of other competitive carrier networks and competitive beyond-perimeter gateways. American West's excessive request for ten out of the available 12 DCA slots would give it a virtual lock on beyond-perimeter service, and defeat the development of rival Western network services contemplated by Congress, such as would be provided by Delta at Salt Lake City.

It is ironic that America West would submit such an excessive request for DCA slots when America West itself just recently strenuously opposed a similar excessive request by Legend for 80 percent of the slots in the Chicago O'Hare slot exemption proceeding: "In passing Air 21, Congress did not intend to grant nearly all of the 30 newly available ORD exemption slots to [one carrier]." Answer of America West, Docket OST-00-6970 (April 11, 2000). Yet here, America West asks for more than 80 percent of the newly available beyond-perimeter slots. America West should abide by its own admonition.

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Las Vegas and Phoenix are scarcely 250 miles apart, and serve exactly the same southwestern network catchment area. DL-R-107. America West's larger Phoenix hub serves 15 out of the 16 potential Las Vegas nonstop-to-nonstop connecting markets (assuming a reasonable 2 hour connecting window and 30 percent circuitry cut-off). DL-R-127.

Accordingly, authorizing the Las Vegas service proposed by America West would produce no additional network benefits for that carrier, but would prevent meaningful double-daily service at a competitive gateway. Similarly, with two daily flights, America West will be able to provide morning and evening DCA services to and from all of the cities in its Phoenix complex. DL-R-128.

Another important statutory consideration is that the authorized services should "not result in meaningfully increased traffic delays." 49 U.S.C. § 41718(a)(4). In that regard, America West's Phoenix and Las Vegas hubs rank dead last among the applicant gateways. Phoenix had an on-time arrival rate of just 68 percent, and Las Vegas only 71 percent for the year ended March 2000. DL-R-129. Adding more America West flights to these delay-prone hubs would pose the most serious risk to increasing travel delays.

On the opposite end of the spectrum, Salt Lake City ranks first in on-time arrivals and departures. Delta at Salt Lake City achieved an on-time arrival rate of 85 percent for the year ended March 2000. DL-R-130. Western U.S.-DCA passengers will have a much better probability of reaching their destination without undue delay on Delta than America West or any

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other applicant. Id.¹

Therefore, while Delta expects that America West will receive slot exemptions for DCA service, America West should receive no more than two daily roundtrip flights. Since Phoenix and Las Vegas serve effectively the same catchment area, America West could split its award between the two cities depending on its own operational needs.

IV. FRONTIER

Frontier's proposal to provide DCA service from its much smaller Denver hub is substantially inferior to Delta's Salt Lake City proposal in terms of network and competitive benefits. DL-R-109.

Frontier serves only nine cities beyond Denver as compared to 33 beyond-Salt Lake connections for Delta. DL-R-111. Frontier would serve zero new nonstop-to-nonstop connection cities versus 14 for Delta. DL-R-112. Because Frontier has a relatively small hub at Denver, it has constructed its limited services primarily to benefit the largest Western cities. Of the nine cities Frontier would serve beyond Denver, each currently has *at minimum* five competitive nonstop-to-nonstop DCA competitors, ranging to as many as ten competitors in

¹ In light of Delta's superior on-time performance and high customer service commitment, it is not surprising that Delta received less than a quarter of the DOT customer complaints that America West received in the year ended March 30, 2000. DL-R-131. Delta's customer complaint rate was also less than that of any other applicant carrier.

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larger DCA connecting markets such as Los Angeles and Phoenix. DL-R-132.

Consequently, small and medium sized communities in the Rocky Mountain West that are most critically lacking in terms of DCA access would continue to be neglected under Frontier's proposal. Altogether, Delta would benefit 27 small and medium sized communities with new or improved access to DCA, as compared to just two for Frontier. DL-R-124.

Another substantial weakness of Frontier's proposal is the small aircraft with which it would provide beyond-perimeter service. Delta's 757 proposal will deliver over 17,000 more annual seats (35 percent more) than Frontier's 737 proposal, thereby having a greater positive effect on beyond-perimeter network service and competition. DL-R-133.

Contrary to Frontier's assertions, it is by no means the low fare maverick for services to the Western United States. In fact, Delta's fares from the Washington area to Frontier's destinations outside the perimeter are 22 percent lower than Frontier's. DL-R-135. Supply and demand are invariably the primary determinants of price. Delta's proposal to deliver more seats to and from more beyond-perimeter DCA city-pairs will undoubtedly have a more positive effect on service and competition than Frontier's proposal.

V. NATIONAL

National's Las Vegas-DCA proposal would be a poor use of the scarce beyond-perimeter DCA slots. National's own data shows that demand for DCA-Las Vegas service is flat, and that demand for Washington area nonstop Las Vegas service is actually shrinking.

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National Application at 6. Not only is there flat or diminishing demand for local service, but National would also fail to provide any meaningful new network competitive benefits, especially considering that San Francisco and Los Angeles—National's only two beyond-LAS service points -- already have numerous and highly competitive nonstop-to-nonstop DCA connections. DL-R-139.

If National believes there is demand for the essentially point-to-point Washington-Las Vegas service it is proposing, it can implement its services at Dulles or BWI without utilizing the scarce DCA slots, which Air 21 intended to be used for beyond-perimeter domestic network benefits and increasing competition in multiple markets.

VI. NORTHWEST

Northwest's proposal to offer a single daily A-319 flight between DCA and Seattle would produce minimal network and competitive benefits. With only 124 seats, Northwest's A-319 is the smallest aircraft of any applicant and would produce the fewest benefits per operation. DL-R-137. Northwest has almost no domestic network of its own at Seattle, and would be forced to rely on services flown by Alaska Airlines.

Located in the extreme Northwest corner of the mainland United States, Seattle is poorly positioned to serve as a domestic connecting hub. Substantially all of Northwest's claimed domestic connecting cities (which are in truth served by Alaska Airlines) would have to endure a 180 degree backhaul for travel to DCA via Seattle. Over 80 percent of potential

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DCA O&D connecting passengers from the cities identified in Northwest's Seattle application would have superior and less circuitous connections over Salt Lake City, and would receive true online service provided by Delta and the Delta Connection. DL-R-138. In fact, Northwest itself already provides less circuitous DCA connections to many cities such as Boise, Billings, Great Falls and the like via its large within-perimeter hub at Minneapolis/St. Paul.

Northwest's claimed benefits to "8 international cities in Japan, Mexico and Canada" have no relevance to Air 21, which is about improving *domestic network benefits*. 49 U.S.C. § 41718. Moreover, Northwest already has extensive inside-perimeter connections to Asia via Minneapolis and Detroit, and it is almost unfathomable that DCA passengers would fly to the extreme northern reaches of the United States to then turn south and fly to Mexico.

With only a single daily flight, Northwest would not be able to offer customers a choice of travel times that is an important consideration in being an effective network competitor. Furthermore, awarding Northwest a single slot pair would preclude the Department from the most efficient and public benefits maximizing award, which would be to award two daily slot pairs to three new beyond-perimeter network carriers.

VII. CONCLUSION

Under all of the relevant statutory criteria, Delta's Salt Lake City-DCA application ranks at the top of the list in providing the enhanced DCA domestic network and competitive benefits envisioned by Air 21. Accordingly, Delta should receive the four slots it needs to

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provide improved service and competition to the Western United States through its beyond-perimeter hub at Salt Lake City.

Respectfully submitted,

Robert E. Cohn
Alexander Van der Bellen
SHAW PITTMAN
2300 N Street, N.W.
Washington, D.C. 20037
(202) 663-8060

Attorneys for
DELTA AIR LINES, INC.

CERTIFICATE OF SERVICE

I hereby certify that I have this 22nd day of May, 2000, served the foregoing Consolidated Answer of Delta Air Lines, Inc., upon those persons listed below by first class mail, postage prepaid and addressed as follows.

Marshall S. Sinick
Squire Sanders & Dempsey, LLP
1201 Pennsylvania Ave., NW, Ste. 400
Washington, DC 20004

Hon. Anthony Williams, Mayor
District of Columbia
444 4th Street, NW, Ste. 1100
Washington, DC 20001

Hon. James Gilmore, Governor
Commonwealth of Virginia
State Capitol
Richmond, VA 23219

Hon. Richard J. Durbin
United States Senate
364 Russell Senate Office Building
Washington, DC 20510

Hon. Peter G. Fitzgerald
United States Senate
555 Dirksen Senate Office Building
Washington, DC 20510

Hon. George H. Ryan, Governor
State of Illinois
207 Statehouse
Springfield, IL 62706

Hon. Dianne Feinstein
United States Senate
331 Hart Senate Office Building
Washington, DC 20510

Hon. Barbara Boxer
United States Senate
112 Hart Senate Office Building
Washington, DC 20510

Hon. Gray Davis, Governor
State of California
State Capitol Building
Sacramento, CA 95814

Hon. Willie L. Brown, Jr., Mayor
City of San Francisco
1 Dr. Carlton B. Goodlett Place
San Francisco, CA 94102

Hon. Richard Riordan, Mayor
City of Los Angeles
200 N. Main Street, Ste. 800
Los Angeles, CA 90012

Hon. Richard M. Daley, Mayor
City of Chicago
121 N. LaSalle St., Room 507
Chicago, IL 60602

John Sullivan, Jr.
Commutair
Clinton County Airport
518 Rugar Street
Plattsburgh, NY 12901

Atlantic Coast Airlines, Inc.
1 Export Drive
Sterling, VA 20164

Atlantic Southeast Airlines, Inc.
100 Hartsfield Center Parkway, Ste. 800
Atlanta, GA 30354

Aaron Goerlich
Gary Garofalo
Boros & Garofalo
1201 Connecticut Ave., NW, Ste. 700
Washington, DC 20036-2605

Jeffrey A. Manley
Wilmer Cutler & Pickering
2445 M St., NW
Washington, DC 20006

Robert M. Beckman
Bode & Beckman
1150 Connecticut Ave., NW
Washington, DC 20036

R. Bruce Keiner, Jr.
Crowell & Moring, LLP
1001 Pennsylvania Ave., NW
Washington, DC 20004

Lawrence R. Laturette
Preston Gates and Rouvelas Meeds
1735 New York Ave., NW, Ste. 500
Washington, DC 20006

Air Midwest, Inc.
d/b/a USAir Express
Box 7724, Mid-Continent Airport
Wichita, KS 67277

Air-Tran Airways, Inc.
6280 Hazeltine National Drive, Ste. 100
Orlando, FL 23822

Allegheny Airlines, Inc.
Box 601
Harrisburg International Airport
Middletown, PA 17057

John Gillick
Winthrop Stimson Putnam
1133 Connecticut Ave., NW, Ste. 1200
Washington, DC 20036

Carl Nelson
American Airlines, Inc.
1101 17th St., NW, Ste. 600
Washington, DC 20036

Richard Taylor
Steptoe & Johnson
1330 Connecticut Ave., NW
Washington, DC 20036-1795

Charles Colgan
Colgan Air, Inc.
10677 Aviation Road
Manassas, VA 22111

Miami Air International, Inc.
PO Box 660880
Miami, FL 33266

Exec Express II
d/b/a Lone Star Airlines
d/b/a Aspen Mountain Air
131 East Exchange Avenue, Ste. 222
Fort Worth, TX 76106

Jonathan B. Hill
Dow Lohnes & Albertson
1200 New Hampshire Ave., NW
Washington, DC 20036

Mark S. Kahan, Vice Chairman
Spirit Airlines, Inc.
1400 Lee Wagener Blvd.
Ft. Lauderdale, FL 33315

John S. Fredericksen
Mesaba Aviation, Inc.
7501 20th Ave., South
Minneapolis, MN 55450

Mr. D. Joseph Coor, President
AirTran Airlines
1800 Phoenix Blvd., Ste. 126
Atlanta, GA 30349

Joanne Young
David M. Kirstein
Baker & Hostetler
1050 Connecticut Ave., NW, Ste. 1100
Washington, DC 20036

Glenn Wicks
The Wicks Group
1700 North Monroe St., Ste. 1650
Alexandria, VA 22209

Robert P. Silverberg
Silverberg Goldman & Bikoff LLP
1101 30th St., NW
Washington, DC 20007

Ronald P. Brower
Hogan & Hartson LLP
555 Thirteenth St., NW
Washington, DC 20004-1109

Andre Merrett, Vice President and
General Counsel
Mesa Air Group
410 North 44th St., Ste. 700
Phoenix, AZ 85008

Stephen H. Lachter
1150 Connecticut Ave., NW, Ste. 900
Washington, DC 20036

Nations Air Express, Inc.
d/b/a World Pacific Airways
2400 Herodian Way, Ste. 440
Smyrna, GA 30080

Megan Rae Rosia
Managing Director, Government Affairs
And Associate General Counsel
Northwest Airlines, Inc.
901 15th St., NW, Ste. 310
Washington, DC 20005

Joel Stephen Burton
O'Melveny & Myers
555 13th St., NW
Washington, DC 20004-1109

William Evans
Verner, Lipfert, Bernhard,
McPherson and Hand, Chartered
901 15th St., NW
Washington, DC 20005-2301

Simmons Airlines, Inc.
d/b/a American Eagle
1700 W. 20th Street
Box 612527
DFW Airport, TX 75261

Brad Rich
SkyWest Airlines, Inc.
d/b/a The Delta Connection
444 S. River Road
St. George, UT 84770

Sunworld International Airlines, Inc.
207 Grandview Drive
Fort Mitchell, KY 41014

Richard D. Mathias
Zuckert Scoutt & Rasenberger
888 17th St., NW, Ste. 600
Washington, DC 20006

Jeffrey Shane
Wilmer Cutler & Pickering
2445 M St., NW
Washington, DC 20006

Edward P. Faberman
Ungaretti & Harris
1500 K St., NW, Ste. 250
Washington, DC 20005

Sierra Pacific Airlines, Inc.
7700 North Business Park Drive
Tucson, AZ 85743

Bradley D. Toney, Director of
Legal Affairs
Pro Air, Inc.
101 Elliott Avenue West, Ste. 500
Seattle, WA 98119

Pierre Murphy
One Westin Center
2445 M Street, NW, Ste. 260
Washington, DC 20037

TEM Enterprises, Inc.
d/b/a Casino Express Airlines
9766 Mountain City Highway
Elko, NV 89801

Ms. Lorelei Peters
Office of the Chief Counsel, AGC-230
Federal Aviation Administration
800 Independence Ave., SW
Washington, DC 20591

Stephen L. Gelband
Hewes Gelband Lambert & Dann
1000 Potomac St., NW, Ste. 300
Washington, DC 20007

Lydia Kennard, Executive Director
Los Angeles World Airports
One World Way
PO Box 92216
Los Angeles, CA 90009

Christopher Brown, Airport Manager
Reagan Washington National Airport
Washington, DC 20001

James A. Wilding, President & CEO
Metropolitan Washington
Airports Authority
One Aviation Circle, Ste. 300
Washington, DC 20001

Commissioner Ellen O'Donnell
Chicago Midway Airport
5700 South Cicero
Chicago, IL 60638

Commissioner Thomas Walker
Chicago Aviation Department
Chicago O'Hare International Airport
PO Box 66142
Chicago, IL 60666

Henry E. Berman, President
San Francisco Airport Commission
San Francisco International Airport
PO Box 8097
San Francisco, CA 94128-8097

Pauline C. Donovan