

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

Application of)
)
 UNITED AIR LINES, INC.)
) **Docket OST-00-7384**
 for frequency allocation and New York-Paris)
 designation under the U.S./France bilateral air)
 services agreement)

Application of)
)
 UNITED AIR LINES, INC.) **Docket OST-95-535**
) **(formerly Docket 47513)**
 for an exemption pursuant to 49 U.S.C. § 40109)
 (New York-Paris))

Application of)
)
 DELTA AIR LINES, INC.) **Docket OST-2000-**
)
 for allocation of U.S. - France frequencies)
 (New York (JFK) - Paris (CDG)))

**CONSOLIDATED ANSWER OF
DELTA AIR LINES, INC., AND
MOTION TO CONSOLIDATE**

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May 26, 2000

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WASHINGTON, D.C.
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(New York (JFK) - Paris (CDG)))	

**CONSOLIDATED ANSWER OF
DELTA AIR LINES, INC., AND
MOTION TO CONSOLIDATE**

Delta Air Lines, Inc. ("Delta") hereby answers the captioned applications of United Air Lines, Inc. ("United") and moves to consolidate them in a single comparative selection proceeding along with Delta's contemporaneous application for additional New York (JFK)-Paris frequencies. Delta opposes United's application because it would prevent the introduction of more rapid and superior replacement service for Tower Air by Delta.

Consolidated Answer of Delta Air Lines, Inc.

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United does not propose to utilize the available Tower frequencies for nearly a full year (April 1, 2001). United asserts that this extensive startup delay is necessary to permit United time to plan and market its new services. Given that the U.S.-France transatlantic marketplace will be completely open by 2003, the Department should not accept a proposal that would involve a full year of foregone benefits.

As stated in Delta's contemporaneously filed application, Delta is prepared to commence services promptly at the beginning of the next IATA traffic season. This will provide New York with its soonest replacement capacity for the lost service resulting from the demise of Tower Air. Unlike United, Delta would also benefit the numerous U.S. cities that Delta serves behind its JFK gateway.

Furthermore, in light of United's recently announced plan to acquire US Airways, United should not receive any new Paris authority in this proceeding. Acquisition of US Airways would give United *two* new nonstop Paris services from US Airways' Northeast gateways at Philadelphia (less than 90 miles from New York), as well as Pittsburgh. The award of additional New York-Paris authority is essential to providing Delta the network capacity it needs to help combat the growing threat to competition posed by United and the STAR alliance.

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WHEREFORE, Delta urges the Department to deny United's request and grant Delta's application for an allocation of seven (7) weekly U.S.-France combination service frequencies for JFK-Paris service.

Respectfully submitted,

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CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing Consolidated Answer of Delta Air Lines, Inc., and Motion to Consolidate has been served this 26th day of May, 2000, upon each of the following persons, by first class mail, postage prepaid.

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