

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

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

**APPLICATION OF DELTA AIR LINES, INC.,
FOR AN ALLOCATION OF FREQUENCIES**

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May 25, 2000

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**APPLICATION OF DELTA AIR LINES, INC.,
FOR AN ALLOCATION OF FREQUENCIES**

Delta Air Lines, Inc. ("Delta") hereby applies for an allocation of seven (7) weekly U.S.-France scheduled combination service frequencies to operate a second daily year-round nonstop flight between New York (JFK) and Paris (CDG), commencing on October 29, 2000, at the start of the next IATA traffic season.

In selecting a replacement New York-Paris carrier for Tower Air, which recently ceased scheduled operations, the Department should give significant weight to which applicant will provide New York with the quickest replacement service. Delta's proposal will provide new JFK-Paris service an entire traffic season earlier than United, which does not propose to begin service until April 2001. Moreover, United's recently announced plan to acquire USAirways would give United *two* new nonstop Paris services from USAirways' Northeast gateways at Philadelphia (less than 90 miles from New York) as well as Pittsburgh.

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No U.S. carrier is better poised to fill the New York-Paris service gap left by Tower than Delta at its JFK gateway. Not only will Delta serve the needs of the large New York-Paris local market, but Delta's strong domestic feed at JFK gives Delta the unique ability to benefit large regions of the country with a single additional JFK-Paris flight.

Beginning in 2003, there will be no restrictions on U.S.-France services. Therefore, it is critical that the Department maximize the benefit of this interim opportunity by awarding it to the carrier prepared to put the frequencies to most immediate use. United's proposal, which would not commence operations for nearly a year, is substantially inferior to Delta's proposal to provide New York-Paris service this fall.

Delta proposes to use B-767-300ER aircraft configured with 48 BusinessElite and 147 coach seats for its new nonstop JFK-Paris flight.¹ Delta's JFK-Paris schedule, projected operation statistics, and route map are contained in the attached Exhibits DL-1, 2 and 3. Delta holds the underlying economic authority to provide JFK-Paris service pursuant to its Certificate of Public Convenience and Necessity for Route 616 (segment 3).

JFK is a major international gateway for Delta. Because of Delta's established service presence and facilities at JFK, Delta is in a position to

¹ Delta reserves the right to substitute other suitable aircraft from its fleet as dictated by market conditions.

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implement JFK-Paris replacement services quickly, thereby minimizing the length of time the traveling and shipping public is left without additional daily frequencies on this densely traveled route, and maximizing the utilization of bilateral rights by U.S. carriers under the U.S.-France agreement.

WHEREFORE, Delta requests that the Department grant this application for an allocation of seven (7) weekly U.S.-France combination service frequencies, as described above, and grant such other and further relief as the Department deems to be consistent with the public interest.

Respectfully submitted,

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CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing Application of Delta Air Lines, Inc., for Allocation of Frequencies has been served this 25th day of May, 2000, upon each of the following persons, by first class mail, postage prepaid.

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