

BEFORE THE  
DEPARTMENT OF TRANSPORTATION  
WASHINGTON, D.C.

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In the matter of :  
 :  
U.S. -COLOMBIA COMBINATION : Docket OST-00-7655  
SERVICE PROCEEDING :  
 :  
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Applications of :  
 :  
CONTINENTAL AIRLINES, INC. : Docket OST-00-7186  
DELTA AIR LINES, INC. : Docket OST-00-7104  
 :  
for allocation of U.S.-Colombia frequencies :  
 :  
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Application of :  
 :  
DELTA AIR LINES, INC. : Docket OST-97-3218  
 :  
Under 49 U.S.C. §41102 for a certificate of :  
Public convenience and necessity :  
(Atlanta-Bogota) :  
 :  
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REPLY OF  
CONTINENTAL AIRLINES, INC.  
AND MOTION FOR LEAVE TO FILE

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Continental Airlines, Inc.

August 21, 2000

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REPLY OF  
CONTINENTAL AIRLINES, INC.  
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Delta<sup>1</sup> wants the Department to deny Continental's motion for leave to file Continental's reply to Delta's factually inaccurate answer because Delta's counsel supplied an incorrect version of Delta's answer to a commercial Internet vendor for

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<sup>1</sup> Common names are used for airlines.

publication, the vendor published it and Continental relied on this version of Delta's answer to prepare its reply. Whether Delta's official version of its answer said Continental offers double-daily Houston and Newark frequencies or not misses the point, however. Delta has not challenged, much less refuted, the balance of the factual errors in the record that Continental correctly cited in its reply, which are myriad, material and require correction. Delta has also failed to rebut Continental's argument that comparative selection procedures will enable Continental to show the Department that breaking American's monopoly on U.S.-Cali service will produce far greater public benefits than adding a seventh airline for U.S.-Bogota service. Without a proceeding, the Department cannot weigh the arguments and evidence to ensure the maximum public benefits of a Colombia award and introduce competition on U.S.-Cali routes.

For the foregoing reasons, Continental urges the Department to grant its motion for leave to file and accept its reply to Delta's consolidated answer, institute

a comparative selection proceeding to consider the award of Colombia authority and to award Continental seven weekly frequencies for Houston-Cali service.<sup>2</sup>

Respectfully submitted,

CROWELL & MORING LLP

/s/ R. Bruce Keiner, Jr.

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Counsel for  
Continental Airlines, Inc.

August 21, 2000

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<sup>2</sup> Continental urges the Department to grant its motion for leave to file this reply so Delta's factual errors can be corrected. No party will be prejudiced by acceptance of this reply, which is essential to the Department's consideration of the issues raised.

CERTIFICATE OF SERVICE

I certify that I have this date served the foregoing document on all parties served with Delta's reply in accordance with the Department's Rules of Practice.

/s/ Thomas Newton Bolling

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Thomas Newton Bolling

August 21, 2000

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