

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

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Notice of )  
          ) )  
DELTA AIR LINES, INC. )  
          ) )  
of intent to operate new nonstop Japan services )  
pursuant to integration authority and existing )  
frequency allocations (New York-Tokyo, and )  
Los Angeles-Nagoya) )  
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**Docket No. OST-2000-7904**

**REPLY OF PORT OF PORTLAND TO  
NOTICE OF DELTA AIR LINES, INC.**

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September 15, 2000

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DEPARTMENT OF TRANSPORTATION  
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**REPLY OF PORT OF PORTLAND TO  
NOTICE OF DELTA AIR LINES, INC.**

On September 6, 2000, Delta Air Lines, Inc. (“Delta”) filed a “Notice” with the Department of Transportation (“DOT” or “Department”) indicating an intention to introduce two new nonstop services between the United States and Japan. These two services were described as “new competitive nonstop service between New York (JFK) and Tokyo and the first daily service and first-ever U.S. flag service between Los Angeles and Nagoya.” Delta cannot begin either service without using the slots and/or authority that it currently uses for Portland-Tokyo and Portland-Nagoya services. By press releases dated September 6, 2000, Delta indicated that it was moving the two Portland-Japan services (Portland-Tokyo to New York JFK-Tokyo, and Portland-Nagoya to Los Angeles-Nagoya).

Today, seven business days later, the Port of Portland, Oregon, the owner and operator of Portland International Airport (“PDX”), files this Reply to that “Notice.” The Port was not served with a copy of that “Notice.” Nevertheless, we obtained a copy and are

replying because the actions proposed in that “Notice” and in the Delta press releases would have a severe adverse economic impact on PDX and the Portland, Oregon metropolitan area.

For very sound reasons stated herein, the Port of Portland seeks a delay in any transfer of slots until October 1, 2001, in order to give Portland reasonable time to seek a suitable new carrier to replace Delta and provide Portland-Japan service. We claim a very strong interest in these slots. We believe it is incumbent upon the Department and in the best interests of the traveling and shipping public, to recognize our interests in these slots, and to grant us this most fair and reasonable period of time in which to keep alive the Portland gateway.

## I. INTRODUCTION

By this reply, it is our intention to do several things. First, we intend to set the record straight on the profitability and success of 13 years of Delta operations between Portland and Japan. The Delta flights were such a terrific success that Delta kept seeking to expand the gateway all the way through 1998 with applications for new services. We believe the Japan services remain profitable to this day, particularly in the most recent months when Portland originating passengers had difficulty securing tickets, and were forced to take inefficient routings via other gateways. We know that as the Japanese economy continues to regain strength, travel between the United States and Japan will increase, and relationships will grow. The future will be bright, with profitability returning to pre-1999 levels for service between Portland and Japan.

Second, we wish to remind the Department of the critical role that the Port has always played in securing and promoting Delta’s services between Portland and Asia. This includes the full evidentiary route proceedings for Tokyo service in 1986 and for Nagoya

service in 1989. No civic party ever did more in support of a carrier than Portland. We believe that has made Portland more than just a civic partner in the success of the services.

Third, we want to point quite specifically to the economics of air service to Japan, and its overwhelming importance to a Pacific Rim Gateway like Portland. The Port has made tremendous infrastructure investments at the airport (expansion of gates, FIS, and other extensive support). The community has made major investments as well, making trading arrangements and locating facilities in Japan, in part because of the convenience of quality air services. Japanese businesses have made major investments in plant and equipment in Oregon and Southwest Washington, again due in large part to the transportation component of daily air services between Portland and Japan.

Fourth, we need time to recruit another carrier to replace Delta and provide Portland-Japan services commensurate with the community needs and with the continuing need of many travelers across the United States for an uncongested and highly efficient gateway to Japan. We intend to encourage and induce other carriers to take advantage of the strong market and cultural linkages between Oregon and Japan by investing in our long-term future.

Fifth, we strongly believe that the Port and the Portland region have a very clear interest, indeed a right, in the slots that Delta currently uses at Narita Airport and Nagoya Airport for operation of Portland-Japan services. We believe the investments that the civic community of Portland and Southwest Washington have made in the 13 years of this successful service entitle us to assert a very strong claim. Further, the traveling and shipping public has grown to rely on the continued availability of the Portland-Japan services. Those considerations should at least entitle us to more time to pursue a replacement carrier that will provide Portland-Japan services, and that carrier may very well

require those existing slots to do so. We seek a delay in approval of Delta's proposed actions until October 1, 2001, in order to provide the Port a reasonable amount of time to induce a suitable carrier to provide this badly needed service for our community, indeed for the entire country. The success that is the Portland gateway should not be laid to rest without a fair opportunity to pursue its continuation.

## II. PORTLAND – A SUCCESSFUL JAPAN GATEWAY

The Port of Portland is disappointed by Delta's decision to remove valued services that Portland has enjoyed for more than 13 years. We have worked closely with Delta throughout this period to help promote all of its Asian services, and the connecting flights that linked much of the United States with the Portland gateway. From the inception of Portland-Tokyo service in March of 1987 through at least the end of 1998, the Portland gateway was a tremendous success for Delta and Portland. During 1998, Delta sought authority for two new Japan services from the Department, and those services were approved and authorized for Portland-Osaka and Portland-Fukuoka. During 1998, it became apparent that economic conditions in Japan and throughout Asia were deteriorating. Despite this downturn in Asian economies, Delta went ahead with startup of Fukuoka services in late fall of 1998. Delta also elected to defer startup of Osaka service at the same time that United Airlines, Inc. ("United") and Northwest Airlines, Inc. ("Northwest") were cutting back some of their own U.S.-Osaka services due to economic conditions.

Delta has contended that it lost \$10 million dollars "from the Japan flights and the related Portland domestic services" in the past year. That year would include Fukuoka, which did not work well. It would surprise us if that contention directly related to either the Nagoya or Tokyo services, which certainly operated with good load factors for the past 10 months. Particularly over the past four months, we know almost all the flights were full,

because local passengers complained that tickets were unattainable. Many Portland originating passengers had to take connecting flights to other gateways to reach Japan. Freight capacity on the Delta flights was, as we understand it, stretched, particularly in the last few months. We strongly believe both Portland-Japan flights remain profitable to this day.

### III. PORTLAND'S ROLE IN SECURING JAPAN SERVICES

In 1986, after the U.S. Government secured important opportunities for new international services between the United States and Japan, the Department instituted a major route proceeding to determine which two of seven competing applications for combination services between the United States and Japan should be authorized. This proceeding was assigned to an Administrative Law Judge, with full evidentiary proceedings, and the hearing lasted more than two weeks.

Delta was one of the applicants for new service, seeking Portland-Tokyo authority. The Port was heavily involved in these proceedings, as the Department knows. Not only did the Port submit its own complete traffic forecast in direct exhibits, but it submitted complete rebuttal traffic forecasts for all other carriers in rebuttal exhibits as well.

This route was of such great significance to Portland, the State of Oregon, and Southwest Washington, that the Port brought as prime witnesses the Chairmen of the Senate Appropriations Committee (Senator Mark Hatfield) and the Senate Finance Committee (Senator Bob Packwood) to personally testify before Judge John Vittone about the importance of this proposed service to our region. Additionally, the Governor and two Oregon Congressmen personally testified, and three other Oregon Members of Congress and one Congressman from Southwest Washington submitted testimony in support of the

Delta proposal. It is our firm belief that in 1986, DOT believed it was authorizing the inauguration of a very significant and unique new service, one that became highly successful for the carrier and the Portland metropolitan area.

The Portland-Tokyo route was so successful initially that Delta immediately applied for and received blind sector authority to extend the flight to Seoul, Korea. When that was a success, Delta sought nonstop Portland-Seoul authority later that year (1987). In 1989, Delta sought Portland-Nagoya service, because Portland-Tokyo and Portland-Seoul were so successful. Delta promotional materials talked about Portland as Delta's Asia hub, or as its international gateway to Asia. Eight years after Portland-Nagoya service began, Delta again applied for more Japan service from Portland, seeking Osaka and Fukuoka authority. It is hard to deny that the Portland experiment was successful at least through 1998, and probably still is, although perhaps not as big a winner as it was before the economic downturn in Asia. Given a chance, Portland will be successful for another carrier, too.

In the Nagoya proceeding, Delta turned over all cross-examination of non-Tokyo service applicants to Portland. The Port's legal counsel served as Counsel for both the Port and Delta in dealing with the witnesses of other applicants for Nagoya or Fukuoka service before the Administrative Law Judge. It is hard to deny that Portland was not at least an equal partner in securing Tokyo and Nagoya rights. The Port has been an equally strong ally and partner for Delta throughout the 13-plus years of service between Portland and Japan.

#### IV. ECONOMIC AND INFRASTRUCTURE INVESTMENTS IN PORTLAND

Any city with nonstop air service to Tokyo has a tremendous stake in the continuation of that service. Airport facilities must be expanded to accommodate such services and the connecting feeder services that accompany such flights. There is

continuing growth in directly related and indirectly related airport traffic. Additional gates, counter space, baggage claim areas, FIS expansion, duty-free shops, and language accommodations must occur. The facilities must be first class to meet the needs of travelers passing through the airport.

When nonstop air services exist to a major destination like Tokyo, local businesses establish and expand trade relationships with Japan and beyond to other key countries in Asia. Many Japanese businesses built local plants in the Portland metropolitan area, relatively near the airport, in order to take advantage of the existing daily transportation links between Portland and Japan. Employment expands to support all of the economic growth. The local economy expands in a multiplier effect as a result of the growth stimulated by the existence of the nonstop flights. Studies done in the early 1990s estimated the impact annually on the local economy of nonstop services to Tokyo at \$250 to \$750 million annually. A more recent study for the Port estimated the annual economic impact of Japan service on the Portland area economy at \$934 million per year. The same study estimated \$52 million in state and local taxes associated with the gateway in 1999.

Portland has experienced all of these impacts. The Port expanded the airport facilities to meet the rising demand of rapid growth in passengers, cargo and flights. A very large share of the growth was stimulated by these rapidly growing links with our Pacific Rim neighbors in Asia. Japanese businesses in the Portland area grew in sheer numbers from about 30 in 1986 to 130 today. The size of those businesses grew during that period as well. We believe that Japanese firms had invested about \$193 million in the local economy of the Portland area in 1986. By 1999, that investment was estimated at more than \$5 billion. There were 1,660 jobs in 1986 at Japanese businesses in the Portland area. Today there are more than 7,000 such jobs. At least 15,000 jobs in the Portland region are directly related to the Japan gateway, with a payroll of over \$450 million. The potential

losses if Portland no longer has nonstop services to Japan are indeed severe.

## V. PORTLAND SEEKS CONTINUED JAPAN SERVICES

The Port of Portland does not wish to lose the existing services, but if Delta must exit, we want to have a reasonable time in which to pursue and secure a suitable replacement carrier. We believe that the Portland-Japan market remains strong, and that a carrier can be induced to take advantage of this opportunity to serve a growing international community. There are very strong links with Japan in the Portland area. This growing community of interest will support air services as it has supported Delta service for more than 13 years. We need the time to get a carrier to work with us to grow these investments in a way that will be most beneficial for that carrier, as well as for the community.

Half of the delay that Portland seeks to pursue a replacement carrier will be provided by Delta, according to its press releases. The Portland-Tokyo and Portland-Nagoya services are planned to continue until April 1, 2001. We are seeking an additional six months to October 1, 2001. Some of the other statements in the Delta press releases (there are 2 releases of which we are aware – one issued in Portland, and another issued in Atlanta), and in the Delta “Notice” are confusing, and appear to be inconsistent.

In the negotiations leading up to the 1998 Memorandum of Understanding (“MOU”) between the United States and Japan, there were extensive discussions among U.S. carriers, cities and U.S. Government representatives about flexibility for carriers seeking the ability to change services (i.e., move gateways within the United States). There was, of course, a Japanese position as well. A review of the 1998 MOU confirms that the result was to grant greater flexibility in moving newly authorized services (those authorized after the MOU) than was provided in moving pre-existing air services.

Portland-Tokyo and Portland-Nagoya are both pre-existing services, and according to the Delta press releases, both Portland-Japan services are being moved. According to the 1998 MOU, Part 1, Section B, Paragraph 5(a), each non-incumbent carrier is entitled to one city-pair move of a pre-existing service. This proposed action seems to constitute two moves. However, even the permitted one move per carrier is qualified or restricted. There is a list of restricted city-pairs in Part 1, Section B, Paragraph 3(a), and the non-incumbent carrier cannot move a city-pair service that is not on the restricted list to a city-pair that is on that list. That would seem to per se prevent a move of Portland-Tokyo service to New York JFK-Tokyo, because Tokyo-Portland is not restricted, while Tokyo-New York is restricted. Thus, where the Delta press releases say the carrier is moving Portland-Tokyo to New York JFK-Tokyo, such a move appears to be blocked by the MOU.

Turning again to the Delta “Notice,” where it says it is using Portland-Tokyo slots at Narita for its New York JFK-Tokyo service, that would appear to us (and likely to the Japanese Government) as the same thing as trying to move the service. We note that Delta says in the “Notice” that it is moving Honolulu-Tokyo authority pursuant to Part 1, Section B, Paragraph 4(b) of the 1998 MOU, and is asking for reallocation of one frequency from either Portland-Osaka or Portland-Fukuoka authority, so that it has enough frequencies for daily service from New York. The Delta press releases and the Delta “Notice” tell slightly different stories about these proposed actions. However, what does seem clear is that a move of the Portland-Tokyo service to New York JFK-Tokyo, as described in the press releases or as described in the “Notice” as a use of slots, is a move that seems to be inconsistent with the terms of the 1998 MOU. It is certainly not a move that Delta can make with a mere “Notice” to the Department, in our view.

With respect to Portland-Nagoya, Delta’s somewhat inconsistent pronouncements

about moving that service to Los Angeles-Nagoya, are again confusing. In the “Notice,” Delta says only that the move is made pursuant to “route integration authority.” We reviewed the Certificate of Public Convenience and Necessity for Route 754, which contains a paragraph about “route integration authority,” and we also reviewed a very similar paragraph in the grant Delta obtained on May 5, 1999 (for only a 2-year period, which expires May 5, 2001).

The paragraph follows:

“Conditions: The route integration authority granted is subject to the condition that any service provided under this exemption shall be consistent with all applicable agreements between the United States and the foreign countries involved. Furthermore, (a) nothing in award of route integration authority requested should be construed as conferring upon Delta rights (including fifth freedom intermediate and/or beyond rights) to serve markets where U.S. carrier entry is limited unless Delta notifies us of its intent to serve such a market and unless and until the Department has completed any necessary carrier selection procedures to determine which carrier(s) should be authorized to exercise such rights; and (b) should there be a request by any carrier to use the limited-entry route rights that are included in Delta’s authority by virtue of the route integration exemption granted here, but that are not being used by Delta, the holding of such authority by route integration will not be considered as providing any preference for Delta in a competitive carrier selection proceeding to determine which carrier(s) should be entitled to use the authority at issue.”

That provision very specifically references consistency with all applicable agreements between the United States and the foreign countries involved. Since the 1998 MOU contains Part 1, Section B, Paragraph 5(a), we express our concerns that Delta’s proposed actions and request seem wholly inconsistent with that provision.

It is our view that our request for additional time to pursue our options is consistent with the need for some degree of delay in considering Delta’s “Notice” and the

inconsistency of some of the proposed actions therein. It is further our view that our requested delay is very well supported by the need to carefully consider the rights of communities that have invested heavily in international air services and have acquired sufficient interests and rights in continuation of the services, that those interests must be given equal weight with any carrier interests.

## VI. PORTLAND HAS EARNED RIGHTS IN THE SLOTS FOR JAPAN SERVICES

For more than 13 years, Portland has played a major role, outlined in part above, in making Portland-Japan service a tremendous success. Portland became a significant U.S. gateway to Japan, in large part through the efforts of the Portland community to provide the infrastructure, the growing local economy, and the strong business and cultural links between Japan and Oregon and Southwest Washington. The continuation of nonstop air services between Japan and Portland is critical. Delta currently provides the only daily cargo service for time sensitive shipments. That is an essential component for our local business community. The traveling and shipping public places great reliance on the availability of these services at PDX. During just the decade of the 1990s, 2,285,656 passengers used the Portland gateway for travel between the United States and Japan. During the last 6 years of that decade (1994-99), no less than 120,000 passengers per year used each of the available Portland flights to Tokyo and Nagoya. Many of the investments made over the 13 years in Portland would cease to be sound ones without these air services. We believe a substitute carrier can be induced to pick up the service, but it will take time, and it most likely will require at least the Narita slots.

We are not contending that Delta blindsided Portland with the news of its decision. There had been some warnings that the services were being re-evaluated, and that Delta was

looking at whether its airplanes might be more profitably used on other routes. Realistically, such “warnings” do not change the way we respond to this “Notice.” First, until Delta made a specific announcement, the Port could not go out and seek another carrier to replace Delta. Second, we knew conditions were improving, with full loads during the most recent months, and frankly, we believed we had turned the corner on consideration of Delta’s abandonment of the Portland-Japan flights. Now that Delta has announced its departure, we need a fair and reasonable amount of time to induce a new carrier to enter the Portland-Japan market. To secure that carrier, we must have the ability to help deliver the slots.

Delta states in its “Notice” that it wants to provide “the first new U.S.-flag nonstop service between JFK and Japan since the 1998 MOU between the United States and Japan.” American Airlines, Inc. (“American”) has authority to operate such service, but has no slots to do so. There are several authorized services to Tokyo since the 1998 MOU that are not operating, and the major problem is a lack of slots at Narita Airport. Those services include American at Boston, American at JFK, Delta at Honolulu, Continental Air Micronesia at Honolulu, and TWA at St. Louis. If Delta were allowed to gain possession of the slots now used for Portland-Tokyo service, there would likely be no slots available for a carrier wanting to provide Portland-Tokyo service in the future. Thus, we view the retention of the slots for Portland-Tokyo use for one year as essential to our ability to secure a suitable carrier.

We again wish to remind the Department that Delta obtained the slots for Portland-Tokyo service only because it proposed a unique service between the United States (via Portland) and Tokyo, not simply because it proposed service to Japan. It was the service proposal that linked Delta’s major hubs with Portland to flow traffic over that particular gateway, and the Portland community’s (political, business and cultural) enthusiasm that the

concept would be successful, that impressed the Department. Portland was correct, and the concept worked exceedingly well, earning millions of dollars for the carrier, and providing the incentive for economic investments in infrastructure and business development in PDX and surrounding areas. During the period of Japan service, Portland-Asia local traffic has grown to be a much more significant percentage of total traffic on the routes.

Our position is that there should be a delay, until October 1, 2001, in any action that would remove Narita slots from availability for Portland service. We recognize that these are slots in a foreign county; and therefore, not within the direct control of the United States Government. However, we believe that there must be ways to accomplish our objective and give Portland time to pursue other alternatives. The Department has previously recognized that communities have some very strong interests in slots at restricted entry airports in the United States. The same concern must consistently be recognized with respect to slot controlled foreign airports. Tokyo is one of the most important foreign destinations in the world. The economic impact of the availability of service to Tokyo is extremely high, as we noted infra at page eight.

Delta seeks to use these slots from New York, which already has four carriers serving the New York JFK-Tokyo market with 747 aircraft, and one carrier serving Newark-Tokyo. It is not a market that is desperate for additional service. Portland, on the other hand, would lack Japan service altogether. It is quite similar to communities in this country that do not want to lose service to Chicago O'Hare, for example. (See, OST-99-5310, Orders 99-3-12 and 99-9-18; and OST-99-5890.) These slots simply must remain with potential Portland-Japan service until October 1, 2001.

## VII. SUMMARY

The Port of Portland strongly recommends that the Department take action to grant our requests. We need the opportunity of one full year to pursue and induce a new carrier to provide Portland-Japan services comparable to the current service provided by Delta. The existing Japan airport slots need to be reserved so that the new Portland-Japan services can be operated, not merely authorized.

We have shown that Portland-Japan service has been very successful for the past 13 years, and that it will be successful again. We have shown that the Portland civic community has invested heavily in the long-term and continuing success of daily air service between Portland and Japan. We have shown that the Portland community has been at least an equal partner with Delta in the success of the Japan services. And, we have shown that there are serious problems (in the form of provisions of the 1998 MOU) with Delta's approach to moving Portland-Japan services to other U.S. gateways.

We believe Portland has earned a strong interest in the slots at issue, and we merely seek a fair and reasonable period of time to try to induce a carrier to provide the services that we feel are essential for the traveling and shipping public. We urge the Department to act favorably upon our requests.

Respectfully submitted,

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Dated: September 15, 2000

## CERTIFICATE OF SERVICE

I hereby certify that I have caused a copy of the foregoing Reply of the Port of Portland to be served upon each of the following persons this 15<sup>th</sup> day of September, 2000, by first class mail, postage prepaid:

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