

**대한항공 KOREAN AIR**

1370, Gonghang-dong, Gangseo-go, Seoul, Korea <http://www.koreanair.com>

April 02, 2008

Docket Operations  
U.S. Department of Transportation  
West Building, Ground Floor  
Room W12-140, Routing Symbol M-30  
1200 New Jersey Avenue, SE  
Washington, DC 20590

2008 APR - 3 A 10: 17

DEPT. OF TRANSPORTATION  
DOCKETS

**RE : DOCKET No. FAA-2008-0036, Policy Regarding Airport Rates and Charges**

Korean Air operates 126 aircrafts and offers scheduled route to 15 cities in United States alone. Attaining 1<sup>st</sup> and 17<sup>th</sup> position in the cargo and passenger sector respectively, Korean Air is one of the representative global leading carriers operating more than 202 flights per week to major U.S. cities. Especially, for the last 3 years, Korean Air expanded its service to U.S. by opening scheduled flights to SEA and LAS each.

As such, we, Korean Air, are very concerned that DOT's proposed amendments to the "Policy Regarding Airport Rates and Charges" will be negatively impacted to the commercial aviation community if the proposed amendments are implemented without more detailed discussion and thorough consideration.

According to U.S., ICAO and International practice, Airport Charges must be 1) revenue neutral; 2) cost based; 3) not unreasonable or discriminatory; 4) tied to services actually provided. All these principles are designed to ensure that airports do not use their monopoly status to overcharge airlines for services rendered.

In light of this, DOT's proposed amendments will offer airport the opportunity to circumvent these principles in the name of congestion, resulting in significantly increased costs for airlines and their passengers, disruption of service and discrimination against specific types of airlines and aircraft. What is worse, it is very doubtful if it will have any positive impact on congestion, the problem it is allegedly intended to address.

We believe that DOT's three primary proposals – Landing fee increase during peak hours, Pre-financing of airport investment, Cross subsidization – cannot be right solution to congestion problem and should be reexamined promptly. We feel that the best way to address airport congestion is to concentrate on expanding and improving infrastructure with air traffic control modernization not introducing “high cost & low effect” charging scheme known as cogestion pricing.

We, Korean Air, appreciates the opportunity to present these comments and are willing to provide possible assistance for better solution to airport congestion issue.

Sincerely,



C. K. Park  
General Manager  
Korean Air