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DATED: May 5, 1999

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

Joint Application of)
)

AMERICAN AIRLINES, INC. and)
AERO CALIFORNIA, S.A. de C.V.)

Docket OST-99-5586

for renewal of statements of authorization under 14 CFR)
Part 212 (reciprocal U.S.-Mexico codesharing services))
)

Joint Application of)
)

DELTA AIR LINES, INC. and)
AEROVIAS de MEXICO, S.A. de C.V.)

Docket OST-99-5593

for renewal of statements of authorization under 14 CFR)
Part 212 (U.S.-Mexico Codesharing))
)

DATED: May 5, 1999

CONSOLIDATED ANSWER OF UNITED AIR LINES, INC.

Pursuant to 14 C.F.R. § 212.5(e), United Air Lines, Inc. ("United") submits the following consolidated answer to the April 26, 1999 Joint Application of American Airlines, Inc. ("American") and Aero California, S.A. de C.V. ("Aero California"), and the April 28, 1999 Joint Application of Delta Air Lines, Inc. ("Delta") and Aerovias de Mexico, S.A. de C.V. ("Aeromexico"), for renewal of their statements of authorization to engage in reciprocal code sharing in various U.S.-Mexico markets:

1. American and Delta, and their respective code-share partners, seek renewal of their statements of authorization to engage in U.S.-Mexico code sharing. United does not oppose their requests so long as United's pending application for renewal of its authority to code share with Compania Mexicana de Aviacion ("Mexicana") is granted no later than the American/Aero California and Delta/Aeromexico applications.

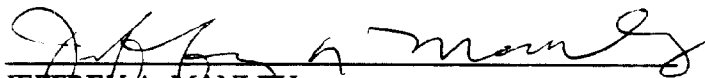
2. On April 26, 1999, United and Mexicana filed a joint application for renewal of their statements of authorization to engage in reciprocal code-share service between the U.S. and Mexico and between Mexico and Costa Rica (Docket OST-99-5582). As is the case with the American/Aero California and Delta/Aeromexico authorities, the United/Mexicana statements of authorization were issued for only 179 days. Because the U.S. and Mexico have successfully concluded a new Memorandum of Consultations addressing bilateral code-share issues, the Department should promptly renew the United-Mexicana statements of authorization for an indefinite term.

3. Also pending before the Department in Docket OST-97-3237 is a United/Mexicana application for amended transborder code-share authority, including a request for blanket statements of authorization to engage in unlimited interior behind-gateway code sharing. In view of the public interest benefits and heightened efficiency that blanket statements of authorization will generate, United urges the Department to promptly approve its pending application in Docket OST-97-3237, as amended and supplemented, no later than it approves any other pending requests for new or renewed U.S.-Mexico authority. It would bestow an unfair competitive advantage upon American/Aero California and/or Delta/Aeromexico if they were

granted renewed or expanded transborder code-share authority before the United/Mexicana applications are approved.

WHEREFORE, the Department should promptly grant United's outstanding applications for U.S.-Mexico code-share authority no later than it acts on any other U.S.-Mexico transborder code-share application, including the American/Aero California and Delta/Aeromexico applications at issue here.

Respectfully submitted,



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