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BEFORE THE
DEPARTMENT OF TRANSPORTATION
OFFICE OF THE SECRETARY
WASHINGTON, D.C.

DEPT. OF TRANSPORTATION
DOCKETS

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In the matter of the applications of

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

Dockets OST-99-5593-7
OST-97-3289-36
OST-98-4577-9
OST-97-2161-16

ANSWER OF NORTHWEST AIRLINES, INC.

Communications with respect to this document should be sent to:

Richard B. Hirst
Senior Vice President,
Corporate Affairs
NORTHWEST AIRLINES, INC.
5101 Northwest Drive
St. Paul, Minnesota 55111

Megan Rae Poldy
Associate General Counsel
NORTHWEST AIRLINES, INC.
901 15th Street, N.W.
Washington, D.C. 20005
(202) 842-3193

Elliott M. Seiden
Vice President,
Law and Government Affairs
David G. Mishkin
Vice President,
International and
Regulatory Affairs
NORTHWEST AIRLINES, INC.
901 15th Street, N.W.
Washington, D.C. 20005

May 28, 1999

BEFORE THE
DEPARTMENT OF TRANSPORTATION
OFFICE OF THE SECRETARY
WASHINGTON, D.C.

In the matter of the applications of	:	Dockets	OST-99-5593
	:		OST-97-3289
DELTA AIR LINES, INC. and	:		OST-98-4577
AEROVIAS DE MEXICO, S.A. DE C.V.	:		OST-97-2161

ANSWER OF NORTHWEST AIRLINES, INC.

Northwest Airlines, Inc. ("Northwest") requests that the Department approve Northwest's applications for code-share authority on U.S. -Mexico routes with Alaska Airlines, Inc. ("Alaska") and Continental Airlines, Inc. ("Continental") without delay. Northwest supports the Department's approval of other code-share applications between the U.S. and Mexico since sufficient opportunities are available for all applicants and the public would not be deprived of the benefits of Northwest's code-share services with Alaska and Continental. However, the Department should defer any action on the Delta/Aeromexico applications since consideration of their requests for code-share exclusivity, additional city pairs and blanket beyond-gateway authority may delay the Department's immediate approval of Northwest's application and those of its code-share partners.

Northwest states as follows in support of its position:

1. The Department should not allow Delta and Aeromexico to hinder Northwest's ability to begin its proposed U.S.-Mexico code-share services with Alaska and Continental expeditiously. Delta and Aeromexico have opted at the eleventh hour to request new authority from the Department for code-share exclusivity, blanket beyond-gateway authority and additional city pairs even though the Department stands ready now to allocate U.S.-Mexico code-share authority to all applicants. The Department will likely require considerable time and devote much attention to the complex and controversial issues associated with code-share exclusivity for Delta and Aeromexico. Northwest's applications for code-share authority with Alaska and Continental have been pending since February, and their alliance agreements have been filed with the Department and reviewed. Other applications for U.S.-Mexico code-share authority have been pending for lengthy periods of time. The Department should not be distracted from granting these outstanding applications immediately. The public should not be denied the considerable benefits of Northwest's code-share arrangements with Alaska and Continental because Delta and Aeromexico seek now to change the Department's focus. Instead, the Department should require Delta and Aeromexico to wait for their authority until their issues are resolved by the

Department and approve all other pending applications without delay.

2. Northwest's proposed service will provide significant benefits to travelers and shippers, is clearly in the public interest and should be granted immediately. The proposed code-share service will enable Northwest to offer additional on-line U.S.-Mexico service and increase the service options available to the U.S. traveling public. Northwest will bring additional competition to the U.S.-Mexico routes now served by Alaska, Continental and other airlines. The numerous consumer benefits will include one-stop check-in at the airport, frequent flyer program enhancements, improved interline services for baggage and more convenient, coordinated connections. Northwest's new travel options made possible through this arrangement, combined with the efficiency of code-sharing on Alaska and Continental flights, will enable Northwest to compete with other carriers more effectively on U.S.-Mexico routes.

For the foregoing reasons, Northwest requests that the Department approve its pending applications for code-share authority with Alaska and Continental and the applications of other carriers immediately and defer action on the pending

applications of Delta and Aeromexico pending resolution of the issues raised by Delta and Aeromexico.

Respectfully submitted,

NORTHWEST AIRLINES, INC.


Megan Rae Poldy
Associate General Counsel

May 28, 1999

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CERTIFICATE OF SERVICE

I certify that I have on this 28th day of May, 1999, caused a copy of the foregoing document to be served by facsimile on all persons on the attached service list.


Megan Rae Poldy^{trb}
Megan Rae Poldy

May 28, 1999

SERVICE LIST

R. Bruce Keiner, Jr.
Crowell & Moring LLP
1001 Pennsylvania Ave, N.W.
10th Floor
Washington, DC 20004

Carl B. Nelson, Jr.
Associate General Counsel
American Airlines, Inc.
1101 17th St., N.W.
Suite 600
Washington, DC 20036

Joel Stephen Burton
O'Melveny & Myers LLP
555 13th Street, N.W.
Suite 500 West
Washington, DC 20004-1109

Joanne W. Young
Baker & Hostetler LLP
1050 Connecticut Avenue, N.W.
Suite 1100
Washington, DC 20036
(for America West)

Jonathan Waller
Vice President and General
Counsel
Midway Airways Corporation
2801 Slater Avenue, Suite 200
Morrisville, North Carolina
27560

Director, Flight Standards Service
Federal Aviation
Administration, AFS-1
800 Independence Ave., S.W.,
Room 822
Washington, DC 20591

Bruce H. Rabinovitz
Jeffrey A. Manley
Kirkland & Ellis
655 Fifteenth Street, N.W.
Washington, DC 20005

Richard J. Fahy, Jr.
Consulting Attorney
Trans World Airlines, Inc.
900 19th Street, N.W.
Suite 350
Washington, DC 20006

Marshall S. Sinick
Squire, Sanders & Dempsey
L.L.P.
1201 Pennsylvania Avenue,
N.W.
Suite 500
Washington, DC 20004
(for Alaska)

Brian Hunt
General Counsel
American Trans Air
7337 West Washington
Street
Indianapolis, IN 46251

USTRANSCOM/TCJ5-AA
Attn: Air Mobility
Analysis
508 Scott Drive, Building
1900
Scott AFB, IL 62225-5357

Roger W. Fones
Chief, Transportation, Energy
& Agriculture Section
Antitrust Division
Department of Justice
325 Seventh St., N.W.
Suite 500
Washington, DC 20530

His Excellency Jesus Silva-
Hervog
Embassy of Mexico
1911 Pennsylvania Ave., N.W.
Washington, DC 20006

David Marchick
Deputy Assistant Secretary for
Transportation Affairs
U.S. Department of State
2201 C Street, N.W., Room 5830
Washington, DC 20590

Robert E. Cohn
Shaw Pittman Potts
& Trowbridge
2300 N Street, N.W.
Washington, DC 20037

William C. Evans
Verner, Liipfert, Bernhard,
McPherson and Hand, Chartered
901 - 15th Street, N.W., #700
Washington, DC 20005