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DEPT. OF TRANSPORTATION

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BEFORE THE  
DEPARTMENT OF TRANSPORTATION  
WASHINGTON, D.C.

Application of	)
	)
SPIRIT AIRLINES, INC.	)
	)
for an exemption pursuant to	)Docket Nos.
49 U.S.C. § 41714	)OST-99-6547 - 15
	)OST-97-2870 - 51
	)OST-97-2932 - 34
Ft. Lauderdale/Ft. Myers/Orlando/	)
Tampa/West Palm Beach/Detroit-	)
New York (LaGuardia Airport)	)
	)

MOTION FOR LEAVE TO FILE  
UNAUTHORIZED DOCUMENT AND SUPPLEMENTAL RESPONSE

Communications with respect to this document should be addressed to:

Hugh B. Weinberg  
Counsel  
Queens Borough President's Office  
120-55 Queens Boulevard  
Kew Gardens, NY 11424-1015  
(718) 286-2880

February 14, 2000

The Office of the President of the Borough of Queens in New York City hereby requests permission to file this unauthorized document in order to supplement its original answer to Spirit Airlines' application for slot exemptions at LaGuardia Airport. We seek to file this document in light of recent factual developments which, we believe, should be considered in connection with Spirit's application.

While Spirit is factually accurate in its observation that it is within its legal rights to fly the MD-80 aircraft in the routes for which it is seeking exemptions, we believe that it is within the discretion of the decision-makers at the United States Department of Transportation (DOT) to take notice of the particular aircraft model which those seeking exemptions seek to use.

In this case, given the recent problems experienced by Alaska Airlines with its MD-80 aircraft and the federal government's recent decision to inspect all MD-80 and similar aircraft, we respectfully request that the DOT give added weight to Spirit's proposed use of the MD-80 aircraft. The Borough President's Office is of course concerned about the safety of air travel – for all those traveling, as well as for all those living near and around airports and under flight paths.

For all the reasons stated in the Borough President's December 8, 1999 response and in all subsequent submissions to the DOT, it is respectfully submitted that Spirit's application be denied in its entirety.

Respectfully submitted,

CLAIRE SHULMAN  
President  
Borough of Queens

By: 

Hugh B. Weinberg, Counsel  
Queens Borough President's Office  
120- Queens Boulevard, Room 244  
Kew Gardens, NY 11424-1015

February 14, 2000