

BEFORE THE
DEPARTMENT OF TRANSPORTATION
WASHINGTON, D.C.

_____))
U.S.-Ecuador All-Cargo) Docket OST-00-7513-14
Frequency Allocation))
_____))

MOTION FOR LEAVE TO FILE AND
REPLY OF POLAR AIR CARGO, INC.

Communications with respect to this document should be sent to:

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DATED: July 6, 2000

BEFORE THE
DEPARTMENT OF TRANSPORTATION
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U.S.-Ecuador All-Cargo) Docket OST-00-7513-14
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The Department instituted this proceeding to allocate three currently unused U.S.-Ecuador all-cargo frequencies. Even though Polar Air Cargo, Inc. ("Polar") is not a party to the proceeding and holds no U.S.-Ecuador all-cargo frequencies, in a consolidated answer filed in this docket dated June 29, 2000, Atlas Air asserts that the OAG Cargo Guide for June 2000 shows Polar operating two Ecuador-U.S. northbound operations weekly. Consolidated Answer at note 1.

In order to ensure that the Department has an accurate record on which to base its decision herein, Polar requests leave to file this unauthorized Reply to Atlas' Consolidated Answer. Although Atlas is correct that the June 2000 OAG Cargo Guide shows Polar as operating two

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weekly U.S.-Ecuador all cargo frequencies, that schedule listing is not accurate and should have reflected Quito as a technical stop on the northbound return of two scheduled southbound Brazil frequencies. Polar today provides no service to or from Ecuador. Polar has, however, applied to the Government of Ecuador for authority to operate cargo charters, service Polar is fully authorized to provide under its U.S. certificate authority and the terms of the Charter Annex to the U.S.-Ecuador Air Services Agreement.

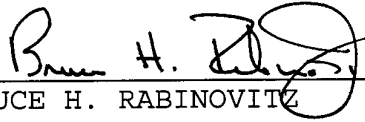
Polar is seeking authority from Ecuador to operate cargo charters because of its plans to implement a programmed series of northbound U.S.-Ecuador cargo charters, plans which it has been unable to implement to date due to the application process in Ecuador. Unfortunately, a Polar employee, aware of Polar's initially planned start-up date for this charter program, mistakenly assumed that the Quito stops were to be operated on a scheduled basis because of the regularity of the flight schedule. The employee, therefore, included the flights in a list of schedules sent to the OAG Cargo Guide for publication. Once Polar learned of the mistake on June 5, 2000, it instructed the OAG to eliminate these flights from

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Polar's schedules included in the Guide. Because the OAG requires 60 days notice for changes to published schedules, the Quito stops will be dropped from the Guide after August 5, 2000.

Polar regrets any confusion this inadvertent oversight may have caused and wishes to assure the Department that it is not now, nor has it previously, conducted any U.S.-Ecuador scheduled services.

Respectfully submitted,



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