

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

Application of)	
)	
US AIRWAYS, INC.)	Docket OST-00-
)	
for an exemption pursuant to)	
49 U.S.C. § 40109)	
(Philadelphia—Brussels))	
)	
)	

September 13, 2000

**APPLICATION OF US AIRWAYS, INC. FOR AN EXEMPTION
(Philadelphia—Brussels)**

Pursuant to 49 U.S.C. § 40109 and Subpart C of the Department's Rules of Practice (14 CFR Part 302), US Airways, Inc. ("US Airways") applies for a two-year exemption from 49 U.S.C. § 41101 to engage in scheduled foreign air transportation of persons, property, and mail between Philadelphia, Pennsylvania, and Brussels, Belgium.¹ US Airways plans to begin nonstop service between Philadelphia and Brussels on or about May 9, 2001, and desires to begin selling the service as soon as possible. Accordingly, US Airways respectfully requests that this exemption application be granted immediately.²

In support of this application, US Airways respectfully states as follows:

Summary of Supporting Points

- With the focus of its route network in the eastern United States and its order for up to 30 new long-range, widebody aircraft, US Airways is well-positioned to provide service across the North Atlantic from its Philadelphia hub. As part of its

¹ To the extent the relevant bilateral agreement requires that US Airways be "designated," US Airways requests that the Department also consider this application as a request for any such designation.

² US Airways will conduct a poll of the U.S. carrier representatives listed on the attached service list to determine if there are any objections to this application and will advise the Department of the results as soon as possible. In any event, US Airways requests that any parties wishing to file answers to this application be required to do so by September 20, 2000.

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transatlantic operations, US Airways plans to inaugurate the only daily nonstop service between Philadelphia and Brussels, the center of the European Community. In so doing, US Airways will establish a new U.S. gateway to Belgium.

- Nonstop, daily service between Philadelphia and Brussels will provide much needed intergateway and intercarrier competition in the U.S.-Belgium and beyond markets. The proposed Brussels flight will offer on-line roundtrip connections for over 60 communities throughout the United States.
- US Airways currently serves seven European destinations from Philadelphia. The addition of daily nonstop service to Brussels will further enhance Philadelphia as an alternative, competitive transatlantic gateway.

1. By this application, US Airways seeks authority to provide its first nonstop service to Brussels, Belgium. US Airways plans to commence its daily nonstop Brussels flight on or about May 9, 2001. Granting exemption authority to US Airways for scheduled foreign air transportation between Philadelphia and Brussels will effectively create a new U.S. gateway to Belgium. It will therefore provide substantial intergateway and intercarrier competition in these markets and the broader transatlantic market as a whole.

2. With the addition of Philadelphia—Brussels service next year, US Airways will serve nine European destinations nonstop from Philadelphia.³ US Airways has committed substantial resources to expand its transatlantic route system from its three network hubs (Philadelphia, Pittsburgh, and Charlotte), all of which are uniquely located in the eastern United States to capture local and flow traffic across the Atlantic. To fulfill this commitment,

³ This includes service to Amsterdam which US Airways will restart on April 11, 2001.

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US Airways has ordered up to 30 widebody, long-range aircraft, some of which have already been delivered and put into service.

3. The service described in this application will provide substantial benefits and new online service to Brussels for dozens of communities linked to US Airways' Philadelphia hub network. US Airways operates 396 daily mainline and express departures at Philadelphia, with nonstop service to 100 communities. Moreover, Philadelphia and the Tri-State Region provide strong and growing international O&D traffic, as demonstrated by the area's support for US Airways' other transatlantic services.

4. For its proposed Philadelphia-Brussels service, US Airways will offer convenient, single-carrier service to 60 behind-gateway cities.

5. US Airways' Philadelphia-Brussels proposal is fully consistent with the rights provided for U.S. carriers under the U.S.-Belgium Open Skies Agreement, which contains no gateway, designation or frequency restrictions.

Required Showings

6. US Airways is a Delaware corporation with its principal office at Crystal Park Four, 2345 Crystal Drive, Arlington, Virginia 22227.

7. US Airways is a citizen of the United States within the meaning of 49 U.S.C. § 40102(a)(15)(C) and is fit, willing and able to serve the U.S.-Belgium market. Indeed, it currently holds various certificates of public convenience and exemption authorities for scheduled foreign air transportation of persons, property, and mail. *See, e.g.*, DOT Order 97-7-2. Pursuant to Rule 24 of the Department's Rules of Practice, US Airways requests that the

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Department take official notice of all information previously filed to establish US Airways' fitness.

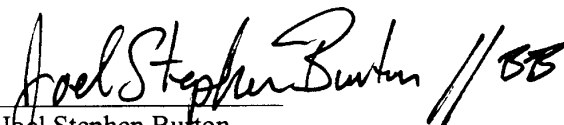
8. US Airways plans to operate daily, scheduled, nonstop Philadelphia-Brussels ("PHL-BRU") service on a year-round basis commencing on or about May 9, 2001, utilizing B-767 aircraft currently in its fleet configured for 203 seats. A map depicting the proposed route is attached as Exhibit A. US Airways' proposed service schedule is attached as Exhibit B, and its anticipated annual operating statistics and fuel consumption estimates are attached as Exhibit C. The environmental impact of US Airways' proposed PHL-BRU service will be *de minimis*.

9. As detailed in Exhibit C, US Airways' fuel consumption for the proposed route is not projected to exceed the ten million gallon threshold specified in Section 313.4(a)(1) of the Department's regulations. US Airways anticipates no difficulties in obtaining adequate fuel supplies for these services.

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WHEREFORE, on the basis of this filing with the attached exhibits, US Airways respectfully requests that its application for exemption authority to operate scheduled foreign air transportation of persons, property, and mail between Philadelphia, Pennsylvania, and Brussels, Belgium be granted.

Respectfully submitted,

By:  // BB
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