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not of such rare caliber. The Department already has recognized that Continental's proposed service between Houston and Buenos Aires would "bring the benefit of opening a new gateway to Argentina." Order 2000-12-13, at 11. Moreover, absent a compelling justification, frequencies in limited-entry markets should not be left unused: the benefits of international air services should not be withheld from the U.S. public until another lengthy route case can be completed. As the Department has explained, "it is not our policy to permit valuable route rights to be wasted." Order 95-8-18, at 5.

Indeed, as the Department observed in the Order to Show Cause, Delta could have in this proceeding submitted a proposal to operate services to Argentina from a gateway other than Atlanta, but choose not to do so. See Order 2000-12-13, at 12. Delta should not be allowed at this late date to redefine the rules of the Department's frequency allocation process in order to offset its lack of commitment to, and vision in, developing new services between the United States and Latin America. In contrast, Continental in this proceeding proposed to create a new network of Argentina services which would compete with the incumbents, United Airlines and American Airlines, from two hubs. Moreover, the Houston Parties continue to be fully prepared to support new service between George Bush Intercontinental Airport and Buenos Aires.

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WHEREFORE, to the extent that the Department does not award all of the U.S.-  
Argentina frequencies available in this proceeding to Continental, the Houston Parties  
respectfully urge the Department to award Continental Airlines backup authority for its  
proposed service between Houston and Buenos Aires.

Respectfully submitted,



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