

BEFORE THE
DEPARTMENT OF TRANSPORTATION
WASHINGTON, D.C.

| | |
|---------------------------------|-------------|
| _____) | |
| Applications of) | |
|) Dockets | |
| UNITED AIR LINES, INC.) | OST-97-3271 |
| DELTA AIR LINES, INC.) | OST-97-3151 |
| AMERICAN AIRLINES, INC.) | OST-97-3269 |
| CONTINENTAL AIRLINES, INC.) | OST-97-3273 |
|) _____ | |
| for allocation of U.S.-Brazil) | |
| frequencies and other relief) | |
| _____) | |

MOTION OF UNITED AIR LINES, INC. TO CONSOLIDATE

Communications with respect to this document should be sent to:

STUART I. ORAN
Executive Vice President -
Corporate Affairs

CYRIL D. MURPHY
Vice President - International
and Regulatory Affairs

MICHAEL G. WHITAKER
Director - International and
Regulatory Affairs

UNITED AIR LINES, INC.
P.O. Box 66100
Chicago, Illinois 60666

SHELLEY A. LONGMUIR
Vice President - Government
Affairs

UNITED AIR LINES, INC.
1025 Connecticut Avenue, N.W.
Suite 1210
Washington, D.C. 20036

DATED: January 2, 1998

JOEL STEPHEN BURTON
GINSBURG, FELDMAN and BRESS,
CHARTERED
1250 Connecticut Avenue, N.W.
Suite 800
Washington, D.C. 20036
(202) 637-9130

Counsel for
UNITED AIR LINES, INC.

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MOTION OF UNITED AIR LINES, INC. TO CONSOLIDATE

United Air Lines, Inc. ("United") respectfully requests the Department to consolidate the above-captioned applications for contemporaneous consideration in a carrier selection proceeding. In support of its request, United submits the following:

Each of the captioned applications requests allocation of seven (7) U.S.-Brazil frequencies. A total of 28 frequencies are requested. Under the US/Brazil bilateral air services agreement, only seven (7) additional frequencies are available for allocation during 1998. Unless the U.S. and Brazil agree to increase the number of frequencies available, the captioned applications are mutually exclusive and must be consolidated for

MOTION OF UNITED AIRLINES

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adjudication in a contemporaneous carrier selection proceeding.
Achbacker Radio Corp. v. FCC, 326 U.S. 327 (1945).

WHEREFORE, on the basis of the foregoing, United Air Lines, Inc., respectfully requests the Department to consolidate the captioned applications for comparative evaluation in a carrier selection proceeding.

Respectfully submitted,

/s/ Joel Stephen Burton
JOEL STEPHEN BURTON
GINSBURG, FELDMAN & BRESS
CHARTERED
1250 Connecticut Avenue, N.W.
Suite 800
Washington, D.C. 20036
(202) 637-9130

Counsel for
UNITED AIR LINES, INC.

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