

service in 1998. Continental's Reply to United's and US Airways' opposition to renewal of Continental's authority states no more than Continental will accept a requirement "that Continental institute service by the end of 1999." Continental Reply, Docket OST-96-1642, January 6, 1998, p.4 n.3.

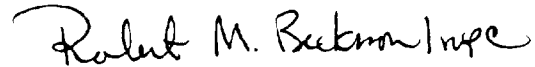
US Airways has not carried its burden of proving that the public interest requires removal of Laker's designation when another rover is available. Particularly when, as here, Laker operated scheduled Ft. Lauderdale-London service in 1996 and 1997 with DC-10-30 equipment, and Laker intends to operate scheduled Ft. Lauderdale-London service in summer 1998, increasing to three flights per week consistent with demand.

It should be noted that US Airways proposes to operate B-767-200 equipment with 203 seats. Two Laker 308 seat DC-10-30 aircraft roundtrips equates to three B-767-200 frequencies. It is inappropriate to count frequencies alone.

Moreover, Laker has a large investment in Ft. Lauderdale-London service. It is the Department's policy "to permit the incumbent carrier to retain . . . rights provided that it has a reasonable plan to use them." Order 96-9-26 at 5; *see also* Order 96-5-37 at 3. US Airways' request to

reallocate Laker's Ft. Lauderdale-London (Gatwick) designation should be denied.

Respectfully submitted,

A handwritten signature in cursive script that reads "Robert M. Beckman".

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