

**BEFORE THE
DEPARTMENT OF TRANSPORTATION
WASHINGTON, D.C.**

**2004 U.S.-MEXICO COMBINATION
SERVICE PROCEEDING**

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Docket OST-04-18692

Applications of

**Frontier Airlines, Inc.
Grand Holdings, Inc. d/b/a Champion Air
and
USA 3000, Inc.**

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**Dockets OST-04-17470
17408
17479**

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**for exemptions pursuant to 49 U.S.C.
§ 40109 (St. Louis-Cancun and
Denver-Puerto Vallarta**

MOTION OF FRONTIER, INC. FOR IMMEDIATE ACTION

Comments with respect to this document should be addressed to:

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August 20, 2004

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MOTION OF FRONTIER, INC. FOR IMMEDIATE ACTION

On August 18, 2004, United Air Lines, Inc. ("United") requested that the Department of Transportation ("Department") dismiss the Denver-Cancun and Denver-Puerto Vallarta applications of Grand Holdings, Inc., d/b/a Champion Air ("Champion") due to the carrier's failure to produce information in support of its applications.

By Order 04-7-17, ("Order"), the Department instituted this proceeding, in part, to select a carrier to operate scheduled service between St. Louis and Cancun. Frontier, Champion, and USA 3000 submitted applications for the St. Louis-Cancun authority. The Order established a procedural schedule for the filing of direct exhibits setting forth detailed information regarding each applicant's service proposals, and required the filing of certain additional documents. The

Department also made clear that the provision of the information was mandatory, and stated “we expect all applicants to set out their firm proposals at the Direct Exhibit stage.” (p. 6, footnote 8) As Champion failed to present any information or exhibits in the Denver-Cancun and Denver-Puerto Vallarta docket, it has also not submitted any of the information that the Department ordered to be submitted in the St. Louis-Cancun proceeding.

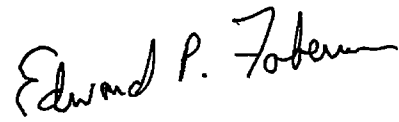
On August 16, 2004, Frontier and USA 3000 filed the STL-CUN information required to be submitted under the Order. However, Champion has not filed any of the additional information set forth in the Order.

Champion cannot be allowed to participate in this proceeding unless it provides all the requested information. If Champion had a valid basis for not submitting the information requested, it should have filed a motion.

Since Champion has elected not to participate in this proceeding, its application for St. Louis-Cancun should be dismissed. Of course, Champion can continue to operate charter flights in this market.

WHEREFORE, Frontier requests that the Department dismiss Champion’s application for St. Louis-Cancun service. Champion’s STL-CUN application should be dismissed at the same time that the Department rules on United’s motion to dismiss Champion’s Denver-Cancun and Denver-Puerto Vallarta applications.

Respectfully submitted,

A handwritten signature in black ink that reads "Edward P. Faberman". The signature is written in a cursive style with a large, stylized initial "E".

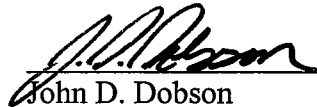
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Dated: August 20, 2004

CERTIFICATE OF SERVICE

I hereby certify that I served a copy of the motion of Frontier Airlines, Inc. for immediate action on August 20, 2004 to each of the persons listed below.


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