

**BEFORE THE
DEPARTMENT OF TRANSPORTATION
WASHINGTON, DC**

In the matter of)	
)	
2005/2006 U.S.-CHINA AIR SERVICES CASE AND DESIGNATIONS)	OST-2004-19077
)	

**APPLICATION OF HAWAIIAN AIRLINES, INC. FOR
CERTIFICATE OF PUBLIC CONVENIENCE AND NECESSITY AND
ALLOCATION OF FREQUENCIES**

Communications with respect to this application should be forwarded to the following:

Joshua Gotbaum
Trustee
Mark B. Dunkerley
President & COO
David M. Webster, Esq.
General Counsel
Dan Burruss
Senior Director
Business Development/Asia Pacific
Hawaiian Airlines, Inc.
P. O. Box 30008
Honolulu, HI 96819

Jonathan B. Hill, Esq.
Joseph A. Davies, Esq.
(admitted in Pennsylvania only)
Dow, Lohnes & Albertson, PLLC
1200 New Hampshire Ave., NW
Suite 800
Washington, DC 20036
202/776-2000
202/776-4725 (fax)
jhill@dowlohnes.com
jdavies@dowlohnes.com

Counsel for Hawaiian Airlines, Inc.

September 22, 2004

**BEFORE THE
DEPARTMENT OF TRANSPORTATION
WASHINGTON, DC**

In the matter of)	
)	
2005/2006 U.S.-CHINA AIR SERVICES CASE AND DESIGNATIONS)	OST-2004-19077
)	

**APPLICATION OF HAWAIIAN AIRLINES, INC. FOR
CERTIFICATE OF PUBLIC CONVENIENCE AND NECESSITY AND
ALLOCATION OF FREQUENCIES**

Hawaiian Airlines, Inc., (hereinafter "Hawaiian") hereby requests the Department of Transportation (hereinafter "DOT" or the "Department"), pursuant to 49 U.S.C. §40102 and Subpart B of the Rules of Practice, to issue an Order granting it the necessary frequencies (four per week) and designating Hawaiian to the People's Republic of China to operate combination service between Honolulu, Hawaii on the one hand and Shanghai, People's Republic of China on the other and points behind the gateway (Honolulu) in the United States, commencing service in 2006. In support of its application, Hawaiian states as follows:

1. Hawaiian has its principal headquarters located in Honolulu, Hawaii. Hawaiian is incorporated under the laws of Hawaii. Its principal office is located at 3375 Koapaka Street, Suite G-350, Honolulu, HI, 96819.
2. Hawaiian is a citizen of the United States as defined under 49 U.S.C. §401102 (a) (15). At least two-thirds of its primary officers and directors are U.S. citizens and U.S. citizens hold at least 75% of the voting stock in Hawaiian.

3. The Department has found Hawaiian fit to provide interstate and foreign transportation of persons, property and mail, most recently by Notice of Action Taken dated January 30, 2004, granting Hawaiian authority to operate scheduled combination service to Australia. Notice of Action Taken, Dkt. OST-04-16923 (1/30/2004). See; Notice of Action Taken Dkt. OST 03-16361 (10/12/03); Orders ; 99-4-44; 97-3-24; Notice of Action Taken Dkt. OST 95-929 (11/10/2003). Hawaiian asks that DOT take official notice of those and other Orders finding Hawaiian ready, willing and able to provide scheduled foreign air transportation of persons, property and mail.

4. Hawaiian is, and will continue to remain fit, to provide scheduled foreign air transportation of persons, property and mail to and from the United States and the People's Republic of China.

5. Hawaiian proposes to operate four (4) frequencies a week using Boeing 767-300 ER aircraft with a fleet average of 260 seats (18 "J" class seats and 242 "Y" class seats). This service will commence on or about May 15, 2006. A proposed schedule is attached as Exhibit A.

6. Hawaiian requests that its award allow integration of the Honolulu-Shanghai route with Hawaiian's other route authority, certificate and/or exemption.

7. This application is consistent with the Protocol of the Agreement between the Government of the United States of America and the Government of the People's Republic of China Relating to Civil Air Transportation entered on or about June 11, 2004 between the People's Republic of China and the United States of America.

8. The grant of such authority is in the public interest in that it will provide for additional capacity between the United States and China, utilize unused bilateral authority and benefit the consumer by providing new service from Hawaii, never before offered. Such new service is critical to Hawaii and its tourism based economy. Hawaiian will open a new market, increase utilization of aircraft and offer its customers additional destinations through its new service.

9. There are no energy or environmental issues associated with this application. Hawaiian's aircraft meets FAA requirements. To the extent any such issues are determined to arise Hawaiian asks that an exemption be granted from such requirements.

OPENING STATEMENT

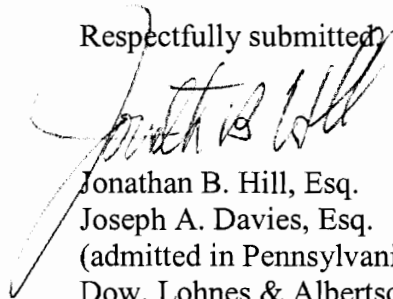
Hawaiian Airlines, with this application, offers to the United States and its citizens the first non-stop service from Hawaii to China. This developing and as yet untried market holds tremendous promise for the future to not only travelers who heretofore have not been able to reach China, except from the mainland of the United States, but to the State of Hawaii and its citizens. This new service will open markets that have never been served directly from Hawaii, offering significant economic growth to Hawaii and its tourism based economy. China is the largest, least developed consumer economy in the world. Tourism and its related benefits is a large and untapped source of economic stimulus to the State of Hawaii and its citizens.

This application also continues Hawaiian's business plans to establish itself as a major carrier in the Pacific. Already providing service to the mainland United States,

Australia and Tahiti, service to the Far East is a natural progression for a carrier such as Hawaiian with its base in the middle of the Pacific Ocean¹. The opening of China and Hawaii to significant tourism is exactly the type of economic stimulus that the new opportunities negotiated with China are meant to expand. Air service to the mainland over Japan, or direct, is already provided by U.S. and Chinese carriers. Increasing that service adds no new dimension to the China/U.S. aviation market. While additional markets within the mainland United States provide new gateways, they do not open new economic benefits not already realized that service to and from Honolulu will bring. Hawaiian's service will be the first service directed at China's growing class of economically independent consumer who are candidates for travel to the United States in general, and to Hawaii in particular.

The grant of this application will provide heretofore untapped opportunities to the Country, Hawaii and Hawaiian.

Respectfully submitted,



Jonathan B. Hill, Esq.
Joseph A. Davies, Esq.
(admitted in Pennsylvania only)
Dow, Lohnes & Albertson, PLLC
1200 New Hampshire Ave., NW
Suite 800
Washington, DC 20036
202/776-2000
202/776-4725 (fax)
jhill@dowlohn.com
jdavies@dowlohn.com

September 22, 2004

¹ Hawaiian in the past has provided extensive charter service to Japan and other Asian destinations.

EXHIBIT A

Proposed 2006 Schedule Honolulu to Shanghai

SA-MO-WE-FR		SU-TU-TH-SA
HNL-SHA		SHA-HNL
10:00 Block Hours		9:10 Block Hours
2:00 PM Departure		8:00 PM Departure
6:00 PM Arrival		11:10 PM Arrival

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing Application of Hawaiian Airlines, Inc. for Certificate of Public Convenience and Necessity and Allocation of Frequencies was served this 22nd day of September, 2004 via email transmission to the following:

msinick@ssd.com
cdonley@ssd.com
mmfaust@uhlaw.com
npbreed@zsrlaw.com
ggarofalo@ggh-airlaw.com
lachter@erols.com
jyoung@bakerlaw.com
dkirstein@bakerlaw.com
agoerlich@ggh-airlaw.com
rbkeiner@crowell.com
megan.rosia@nwa.com
dvaughan@kelleydrye.com
jrichardson@johnrichardson.com
carl.nelson@aa.com
robert.cohn@shawpittman.com
gpwicks@wicks-group.com
lharig@wicks-group.com
jngluck@erols.com
ed.connolly@evergreenaviation.com
jim.friedel@nwa.com
matwood@sherblackwell.com
kquinn@pillsburywinthrop.com
mfrancesconi@kelleydrye.com
daniel.mcdonald@dhl.com
ncmason@leftwichlaw.com
tstalnaker@eclatconsulting.com
sascha.vanderBellen@shawpittman.com

lhalloway@crowell.com
howard_kass@usairways.com
rsilverberg@sbgdc.com
rpommer@atlasair.com
kevin.montgomery@polaraircargo.com
tom.lydon@evergreenaviation.com
nssparks@fedex.com
pmurphy@lopmurphy.com
mroller@rollerbauer.com
cargoair@aol.com
ldwasko@erols.com
cbethke@airlines.org
rpriddy@naca.cc
fbavent@airlineinfo.com
jeffrey.manley@wilmerhale.com
david.heffernan@wilmerhale.com


Deborah L. Kunkle