

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

In the matter of)
)
PETITION OF UNITED AIRLINES, INC.)
FOR AN EXEMPTION)
)
)

Docket No. OST-2004-19148

**ADDITIONAL COMMENTS OF THE AIR CARRIER ASSOCIATION OF AMERICA
ON PETITION OF UNITED AIRLINES, INC. FOR AN EXEMPTION**

Communications with respect to this document should be addressed to:

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October 19, 2004

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U.S. DEPARTMENT OF TRANSPORTATION (“DEPARTMENT”)
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On September 28, 2004, the Air Carrier Association of America (“ACAA”) submitted comments opposing United’s September 15, 2004 petition that requested an exemption from 49 USC § 41101 to authorize United to display its designation code on flights operated by Lufthansa and other carriers that operate on Lufthansa’s behalf.

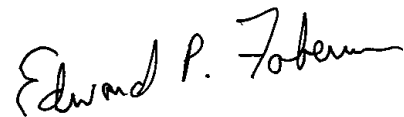
On October 12, 2004, United responded to ACAA’s comments stating that ACAA did not oppose the American Airlines-British Airways agreement. Contrary to United’s fantasy reasoning, submission of comments on this particular proposal is not limited to parties that had commented on a different proposal.

There is no basis for the Department of Transportation (“Department”) to approve United’s request. ACAA believes that once the Department completes its review of United’s petition and an analysis of the growth of code-sharing relationships (including those among multiple alliances and carriers), it will decide that the authorization requested by United should not be approved. The Department should then re-evaluate all agreements previously approved and after that review is complete, the Department should also reject those agreements.

Conclusion

As a result of the continuing expansion of code-sharing involving multiple relationships, the Department should review the overall impact of code-sharing on consumers and competition before it considers any additional exceptions to the code-share requirements. Therefore, ACAA urges the Department to deny United's request.

Respectfully submitted,

A handwritten signature in black ink that reads "Edward P. Faberman". The signature is written in a cursive style with a prominent flourish at the end of the name.

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CERTIFICATE OF SERVICE

I hereby certify that I served a copy of the reply of the ACAA on October 19, 2004 to each of the persons listed below.

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