

U.S. DEPARTMENT OF TRANSPORTATION
OFFICE OF THE SECRETARY
WASHINGTON, D.C.

Application of
Delta Airlines, Inc.

For allocation of seven weekly U.S.-Brazil
Combination frequencies

Docket Number OST-2004-19161

Application of
American Air Lines, Inc.

For allocation of five weekly U.S.-Brazil
combination frequencies

Docket Number OST-2005-20747

**RESPONSE OF METROPOLITAN WASHINGTON AIRPORTS AUTHORITY IN
SUPPORT OF UNITED AIRLINES' USE OF ITS BRAZIL FREQUENCIES TO ADD
NEW SERVICE TO WASHINGTON**

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The Metropolitan Washington Airports Authority (the "Authority") responds in support of United Airlines' decision to utilize seven of its Brazil frequencies to initiate important new daily service this fall to Sao Paulo from Washington Dulles International Airport, as detailed in United's April 4, 2005 Answer in Docket OST-2005-20747. A fortiori, the Authority supports United's objections to proposals, reflected in both the above-captioned dockets, to permanently transfer to other carriers United's existing frequencies to serve Brazil.

United's proposal to use seven of its Brazil frequencies to enable a new daily nonstop service to Sao Paulo represents a substantial enhancement of service -- not only for Washington

area travelers, but also for travelers to South America from the entire United States, particularly the East Coast. Significantly, this service will further nurture the growth of the Washington hub as a major competitive gateway to South America – building on existing service to Rio de Janeiro, Sao Paulo, Buenos Aires, and Montevideo.

The proposed timing of the United flight – to begin in this fall’s peak season – will enable U.S. passengers to conveniently connect with the morning banks of Varig Brazilian Airline flights leaving from Sao Paulo, thus improving access for U.S. travelers to all of South America. Convenience is further enhanced by Varig’s partnership with United in the Star Alliance, allowing for more “seamless” travel to and from one Star hub (IAD) to and beyond another (Sao Paulo). In short, the proposed new service will fully utilize United’s Brazil frequencies – linking important network partner hubs with well-timed connections, and building the benefits of network-to-network connectivity.

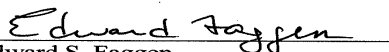
As discussed more fully in the Authority’s February 25, 2005 reply to Order 2005-2-10 in Docket OST-2004-19161, there is a clear demand for new South American service from the Washington region, with recent load factors in excess of 80% on Brazil flights. At the same time, the Washington community’s diverse Latino population has grown more than 90% in the last decade alone, and includes significant South American populations. Burgeoning tourism and trade activity continues to add to demand.

In supporting United’s new service, the Authority necessarily opposes any permanent reallocation of the United frequencies needed for that service. Withdrawal of the needed

frequencies from United would deprive Washington of a concrete opportunity for enhanced service to a key South American marketplace, undermine the emerging role of Dulles as an anchor for a comprehensive network of competing, convenient United and Star Alliance services to Latin and South America, as well as diminish the consumer and business benefits offered by the new service. In this regard, the Authority continues to urge in Docket OST-2004-19161 that Delta be permitted to utilize United's Brazil frequencies on a temporary basis only.

For these reasons, the Authority respectfully urges the Department to deny any frequency reallocation and particularly any action that would interfere with the near-term start-up of the newly-announced United service to Sao Paulo, or constrain United's ability to offer additional Brazil services from Washington in the future.

Respectfully submitted,


Edward S. Faggen
Vice President and General Counsel

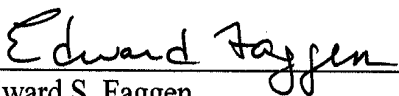
METROPOLITAN WASHINGTON
AIRPORTS AUTHORITY

Dated: April 6, 2005

CERTIFICATE OF SERVICE

I hereby certify that I have this day served the foregoing document by email on the following persons:

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Edward S. Faggen
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April 6, 2005

