

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

In the Matter of)	
)	
2007 U.S.-China Combination and All-Cargo Frequency Allocation Proceeding)	Docket OST-06-25275
)	
)	

DATED: August 18, 2006

**MOTION OF POLAR AIR CARGO, INC.
FOR IMMEDIATE ACTION**

Polar Air Cargo, Inc. ("Polar") hereby requests the Department immediately to grant Polar's application filed yesterday in this proceeding for the allocation of four weekly U.S.-China Zone One all-cargo frequencies. In support of its request, Polar submits the following:

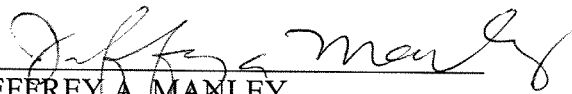
1. In response to the Department's invitation in Order 06-7-9, Polar and two other incumbent all-cargo carriers (Fed Ex and Northwest) have each filed for four U.S.-China all-cargo frequencies, for a total of 12 out of the 15 that are available.
2. As noted in Order 06-7-9, only incumbent carriers are eligible for allocation of these frequencies. In view of the fact that only 12 such frequencies are requested out of the 15 that are available, there is no need for the Department to adjudicate among the three applications that were filed.
3. In these circumstances, the Department should move immediately to grant Polar's application since the grant of Polar's four frequencies does not mutually exclude

the grant of the other two applications. Furthermore, the Department should terminate this proceeding insofar as it relates to the allocation of U.S.-China all-cargo frequencies.

4. Polar will poll the interested parties to determine whether they have any objection to this request and report the results to the Department. Assuming that there are no objections, the Department should grant Polar's application immediately without awaiting the answer date on this motion.

WHEREFORE, on the basis of the foregoing, Polar Air Cargo, Inc. respectfully requests that its application dated August 17, 2006, in the captioned proceeding be granted immediately and that the Department grant Polar such other and different relief as it may deem consistent with this Motion and Polar's application in this docket.

Respectfully submitted,



JEFFREY A. MANLEY
WILMER CUTLER PICKERING
HALE and DORR LLP
1875 Pennsylvania Avenue, N.W.
Washington, D.C. 20006

Counsel for
POLAR AIR CARGO, INC.

DATED: August 18, 2006

