

BEFORE  
DEPARTMENT OF TRANSPORTATION  
WASHINGTON, D.C.

Application of )	
DELTA AIR LINES, INC. )	Docket OST-2007-27019
for a certificate of public convenience and )	
necessity pursuant to 49 U.S.C. § 41102 )	
and frequency allocation (U.S.-China) )	

Communications with respect to this document should be addressed to:

Mark B. Dunkerley  
President & COO  
Dan Burruss  
Senior Director, Business  
Development Asia/Pacific  
Hawaiian Airlines, Inc.  
P.O. Box 30008  
Honolulu, HI 96820

Jonathan B. Hill, Esq.  
J. Parker Erkmann, Esq.  
Dow Lohnes PLLC  
1200 New Hampshire Ave., NW  
Suite 800  
Washington, DC 20035  
202/776-2000  
[jhill@dowlohn.com](mailto:jhill@dowlohn.com)  
[perkmann@dowlohn.com](mailto:perkmann@dowlohn.com)

Counsel for Hawaiian Airlines, Inc.

February 9, 2007

BEFORE  
DEPARTMENT OF TRANSPORTATION  
WASHINGTON, D.C.

Application of )	
) )	
DELTA AIR LINES, INC. )	Docket OST-2007-27019
for a certificate of public convenience and )	
necessity pursuant to 49 U.S.C. § 41102 )	
and frequency allocation (U.S.-China) )	
) )	

ANSWER OF HAWAIIAN AIRLINES, INC.

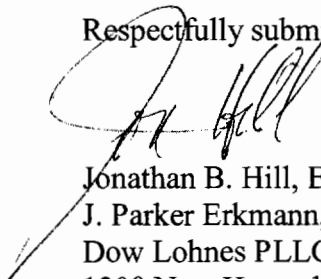
Hawaiian Airlines, Inc. (hereinafter "Hawaiian") files this Answer to the Application of Delta Air Lines, Inc. for a Certificate of Public Convenience and Necessity and Frequency Allocation filed January 19, 2007 (the "Delta Application").

In 2005 and 2006, Hawaiian applied for and was denied the right to service China. Like Delta, Hawaiian was ineligible to apply for operating rights in the most recent award because the bilateral only allowed additional frequencies to incumbent carriers.

So far service to the Chinese market from the United States has been provided only by the "usual suspects," United, Northwest, American and Continental. The Delta Application is more of the same -- another major carrier requesting rights to provide essentially the same service that the traveling public in the United States already has. Hawaiian has proposed, and will propose when the Department institutes a new proceeding, to offer service to China to and from markets not presently served by U.S. carriers. Accordingly, adding a new carrier like Hawaiian will increase consumer choice, add new gateways and stimulate competition in the marketplace.

Hawaiian assumes that the Department will institute a proceeding in a timely manner and at that time Hawaiian and other carriers will be given an opportunity to apply for the 2008 designation and required frequencies. Based upon that assumption, Hawaiian reserves its right to object to the Delta Application and reserves its right to file a competing application until such time as the Department institutes a proceeding with an appropriate order<sup>1</sup>.

Respectfully submitted,



Jonathan B. Hill, Esq.  
J. Parker Erkmann, Esq.  
Dow Lohnes PLLC  
1200 New Hampshire Ave., NW  
Suite 800  
Washington, DC 20036  
[jhill@dowlohn.com](mailto:jhill@dowlohn.com)  
[perkman@dowlohn.com](mailto:perkman@dowlohn.com)  
202/776-2000

Counsel for Hawaiian Airlines, Inc.

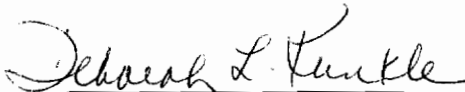
---

<sup>1</sup> Should for any reason the Department require or expect an Answer to be filed in response to the Delta Application, the Department should consider this to be Hawaiian's Answer in Opposition.

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing Answer of Hawaiian Airlines, Inc. has been served via email transmission this 9th day of February 2007 upon the following:

carl.nelson@aa.com  
rbkeiner@crowell.com  
hkamen@coair.com  
sascha.vanderbellen@nwa.com  
jonathan.moss@wilmerhale.com  
howard\_kass@usairways.com  
evin.montgomery@polaraircargo.com  
dvaughan@kelleydrye.com  
nssparks@fedex.com  
byerlyjr@state.gov  
jim.ballough@faa.gov  
ben.decosta@atlanta-airport.com  
reohn@hhlaw.com  
prrizzi@hhlaw.com

  
Deborah L. Kunkle