

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

**In the Matter of U.S.-China Combination and All-Cargo  
Frequency Allocation Proceedings**

**OST-2007-28361**

**COMMENTS OF  
THE WAYNE COUNTY AIRPORT AUTHORITY**

Communications with respect to this document should be sent to:

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Dated: June 1, 2007

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The Wayne County Airport Authority hereby submits these Comments in response to the Department's Notice on the new U.S.-China route opportunities. We are delighted that the Department has secured substantial new opportunities and is now in a position to entertain applications for new service to China. We urge the Department to immediately establish a proceeding to allocate the available China frequencies through 2009.

Northwest Airlines has already indicated its strong interest in new nonstop service on the Detroit-Shanghai and Detroit-Beijing routes. *See*, NWA Press Release dated May 23, 2007. Detroit is, without a doubt, the largest and most effective hub gateway for service to China that does not currently have nonstop service, and the Department should make new China service at Detroit a top priority.

The Wayne County Airport Authority participated in the 2007 China Case, and was very disappointed that Northwest was not selected last year for Shanghai service. However, with so many applicants, and so few opportunities, the Department faced a difficult and very limited choice. With the breakthrough China agreement, the Department now has the ability

to allocate many more frequencies to the benefit of carriers, communities, and the traveling public.

The establishment of nonstop China service at Detroit Metropolitan Airport is critical to the Airport, to Northwest Airlines, to Michigan jobs and the state's economy, and to the competitiveness of the Detroit hub. Improved nonstop service will also help foster and strengthen the growing manufacturing and industrial ties between companies in Michigan and China. We note that the Department has authorized multiple nonstop services from East Coast hubs in recent years, and recently awarded a fifth frequency to United. The DOT should allocate the substantial new opportunities that are available so that Northwest can establish competitive service at the Detroit.

The Department has conducted multi-year consolidated cases in the past, such as the recent 2005/2006 China case, and deciding the route awards through 2009 avoids the cost and inefficiency of conducting immediately sequential route cases. In these circumstances, The Department should immediately establish an expedited proceeding and award the 42 China frequencies that are available through 2009, so that the Wayne County Airport Authority, the State of Michigan and regional Detroit, and Northwest Airlines and can share in the good news of the successful China negotiations.

Respectfully Submitted,

A handwritten signature in black ink, reading "Lester W. Robinson". The signature is written in a cursive style. To the right of the signature is a vertical red line.

Lester W. Robinson

CEO, Wayne County Airport Authority