

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

**2007/2008/2009 U.S.-China Air Services and Combination
Frequency Allocation Proceeding**

OST-2007-28567

**COMMENTS OF
THE WAYNE COUNTY AIRPORT AUTHORITY**

Communications with respect to this document should be sent to:

Lester W. Robinson
Chief Executive Officer

Laura L. Jackson
Director, Air Service Development

WAYNE COUNTY AIRPORT AUTHORITY
Detroit Metropolitan Airport (DTW)
L.C. Smith Terminal, Mezzanine
Detroit, Michigan 48242 USA
(734) 942-3550
laura.jackson@wcaa.us

Dated: July 3, 2007

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

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

OST-2007-28567

**COMMENTS OF
THE WAYNE COUNTY AIRPORT AUTHORITY**

The Wayne County Airport Authority fully supports the Department's original decision, announced in Order 2007-06-15, to combine the allocation of the 42 U.S.-China combination frequencies for years 2007- 2009. This is clearly the most efficient and effective means of allocating the new opportunities, and the objecting carriers have failed to show otherwise.

The award of allocations for the years 2007-2009 are all relevant to the immediate public interest question at issue – which is how best to meet greatly underserved U.S. passenger demand for travel to China. New service at Detroit by Northwest would create the largest and most effective new hub gateway to China. Sufficient opportunities should be placed at issue, so that both new entrants and incumbents have the ability to immediately secure frequencies that are necessary to plan and implement beneficial new China services -- such as those Northwest wants to provide at Detroit. The Department has set a precedent of conducting 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.

The Department thoroughly considered comments from all interested parties in response to its original Notice (OST-2007-28361), and Order 2007-06-15 provides a sound and well-reasoned basis to proceed with the allocation of U.S-China opportunities. There is no reason to alter that decision.

Respectfully Submitted,

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

Lester W. Robinson

CEO, Wayne County Airport Authority

CERTIFICATE OF SERVICE

I hereby certify that the foregoing Comments were served by electronic mail on this 3rd day of July, 2007 upon the following:

sascha.vanderbellen@nwa.com
charles.hunnicutt@troutmansanders.com
carl.nelson@aa.com
recohn@hhlaw.com
jeffrey.manley@united.com
jhill@dowlohnes.com
hershel.kamen@coair.com
dan.weiss@coair.com
rbkeiner@crowell.com
howard_kass@usairways.com
kevin.montgomery@polaraircargo.com
jonathan.moss@wilmerhale.com
julie.oettinger@united.com
perkmann@dowlohnes.com
bruce.rabinovitz@wilmerhale.com
prrizzi@hhlaw.com
brubinst@panynj.gov
gbleopard@fedex.com
dvaughan@kelleydrye.com
fbavent@airlineinfo.com