BEFORE THE
DEPARTMENT OF TRANSPORTATION
FEDERAL AVIATION ADMINISTRATION
WASHINGTON, D. C.

Operating Limitations at Chicago O'Hare International Airport	:	OST-2004-16944

COMMENTS OF AMERICAN AIRLINES, INC.

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American Airlines, Inc. hereby submits the following comments for the public record with respect to operating limitations at Chicago O'Hare International Airport (ORD).

1. American supports the efforts by the Department of Transportation and the Federal Aviation Administration to achieve an equitable solution on a temporary basis to the current problems of congestion and delays at O'Hare. American has already participated in two rounds of reductions of its ORD operations in 2004, and is an active participant in the third round.

2. Any long term solution should focus on increasing capacity at O'Hare instead of restricting schedules, particularly the schedules of a hub carrier such as American. American relies on O'Hare to support a major portion of its domestic and international route network, including service operated by American Eagle to smaller communities which are not being served by new entrant carriers. Reductions by American at

O'Hare adversely affect numerous cities throughout the United States which depend on O'Hare for their access to the national air transportation system.

3. American stresses the importance that the FAA not unduly restrict capacity at ORD even on an interim basis. The FAA's delay reduction order should set operations at the maximum level that still allows all involved to achieve the goal of more dependable ORD operations. As part of maximizing capacity at ORD for scheduled services, the FAA should also consider new limits on general aviation. Undue limits on scheduled operations at ORD will unnecessarily jeopardize service to smaller communities, reduce choice for consumers, and impose additional hardship on our ORD-based employees.

4. Once an airport such as O'Hare has been declared congested by DOT/FAA, then service increases by any carrier at that airport should be restricted. There should not be a system which expects a hub carrier such as American to reduce its O'Hare schedules but at the same allows other carriers to increase their schedules. Such a system would threaten the continuing status of O'Hare as one of the Nation's most important hub airports by unduly favoring point-to-point services over hub operations. Indeed, American has already shouldered

much of the burden of the FAA's two previous orders by reducing its service at ORD, only to see the FAA allow other airlines to grow. American views this as neither fair nor equitable.

5. As a short term solution, American would support hourly limits for O'Hare arrivals, provided that whatever temporary reductions may be necessary are distributed fairly and with explicit recognition of O'Hare as a hub airport, as well as recognition that the goal is not to redistribute capacity from some carriers to others, but rather to provide meaningful relief from delays at ORD.

6. Consistent with the foregoing, the FAA should not reserve capacity for limited incumbents (defined as carriers with eight or fewer arrivals between 0700 and 2059 based on current schedules) or new entrants to expand service, while asking American once again to significantly reduce its own ORD operations.

7. Under a temporary cap, carriers should be allowed to trade or transfer arrival hours between one another, including transactions involving monetary consideration.

8. DOT/FAA should state that any temporary measures put in place at ORD are not a precedent for actions at other airports experiencing congestion and delays, but that each such situation is unique and will be addressed based on its own particular facts and circumstances.

Respectfully submitted,

Walter J. Aue CAN

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