AIR TRANSPORT ASSOCIATION

October 28, 2004

Docket Management Facility
U.S. Department of Transportation
400 Seventh Street, SW
Nassif Building, Room PL-401
Washington, DC 20590-0001

Re: Proposed Reservation System for Unscheduled Arrivals at Chicago O'Hare International Airport

Notice of Proposed Rulemaking
Docket No. FAA-2204-19411
69 Federal Register 61708 (October 20, 2004)

Dear Sir or Madam:

The Air Transport Association of America, Inc.[1], on behalf of its member airlines, submits the following comments about the Notice of Proposed Rulemaking ("NPRM") announcing FAA's intent to implement a reservation system for unscheduled arrivals at O'Hare International Airport beginning November 1, 2004, and continuing through April 30, 2005 (69 Fed. Reg. 61708, October 20, 2004). Our member airlines welcome this logical and necessary next step in the FAA's comprehensive effort to address air traffic delays at O'Hare. In particular, ATA supports the proposed limit of non-scheduled operations coupled with the proposed advance reservation system, to ensure the fairness and integrity of the FAA's cap on operations.

Due to the highly integrated air traffic network in the United States, the traveling public and airlines operating across the country are impacted by schedule delays and adjustments at O'Hare. Since all users of air traffic control at O'Hare impact scheduling and, therefore, congestion, all users should contribute to the solution. Through discussions permitted under VISION 100 and 49 U.S.C. Sec. 41722, scheduled

[1] ATA serves as the principal trade and service organization of the major scheduled air carriers in the United States. ATA's members include: ABX Air, Alaska Airlines, Aloha Airlines, America West Airlines, American Airlines, ASTAR Air Cargo, ATA Airlines, Atlas Air, Continental Airlines, Delta Air Lines, Evergreen International Airlines, FedEx Corp., Hawaiian Airlines, JetBlue Airways, Menlo Worldwide Forwarding, Midwest Airlines, Northwest Airlines, Polar Air Cargo, Southwest Airlines, United Airlines, UPS Airlines and US Airways; associate members include Aeromexico, Air Canada, Air Jamaica and Mexicana.

AIR TRANSPORT ASSOCIATION OF AMERICA, INC.
1301 PENNSYLVANIA AVENUE, NW SUITE 1100 WASHINGTON, DC 20004-1707
202.626.4000 www.airlines.org

commercial air carriers – particularly United and American – have contributed to the solution through reductions in their scheduled operations during identified peak hours. It is appropriate for other users, including general aviation, charter, military, and public aircraft, likewise to adjust their operations. As described in the NPRM, a partial solution delivered by some but not all operators will not resolve persistent congestion at O'Hare.

FAA notes that in its August 18th Order imposing a limit of 88 arrivals for scheduled arrivals during peak hours, it assumed that the airport also would accommodate four unscheduled arrivals per hour. FAA states this limit is necessary to achieve "the overall established operational target for scheduled and unscheduled arrival flights." 69 Fed. Reg. at 61710. In short, a firm limit on the number of unscheduled arrivals is necessary to ensure that reductions in operations made by scheduled air carriers result in reduced delays. If no limit is imposed, the number of unscheduled operations will offset the delay reduction benefits of the reduced number of scheduled operations. Efficient air traffic control and basic equity require accommodations by all system users.

ATA and its member airlines welcome the opportunity to work with the FAA in its efforts to reduce congestion at O'Hare and to improve the overall performance of the national air traffic control system. We urge the FAA to continue to explore further opportunities among non scheduled air carriers as all users of the national air space benefit from the efficient use of air space. Please contact me if you would like to discuss these comments further or have any questions.

Sincerely,

Paul McGraw
Managing Director, Airspace Management