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

DEPT. OF TRANSPORTATION
DOCKET SECTION

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Joint Application of

Delta Air Lines, Inc.
Swissair; Swiss Air Transport Compnay, Ltd.
Sabena, S.A., Sabena Belgian World
Airlines, and
Austrian Airlines, Osterreichische
Luftverkehrs AG

for approval of and antitrust immunity for
Alliance Agreements pursuant to 49 U.S.C.
Sections 41308 and 41309

Docket OST-95-618 -21

PETITION OF TRANS WORLD AIRLINES FOR RECONSIDERATION

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October 20, 1995

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DEPARTMENT OF TRANSPORTATION
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Docket OST-95-6 18

PETITION OF TRANS WORLD AIRLINES FOR RECONSIDERATION

TWA hereby petitions for reconsideration of the Department's Scheduling Notice and Initial Determination on the Motion for Confidential Treatment, served October 16, 1995. In that Notice, the Department postponed a ruling on requests for confidentiality, but nevertheless, set a date of November 3, 1995 for filing of comments. TWA hereby petitions for reconsideration and requests that the Department postpone the comment date for a minimum of two weeks, and in particular, no earlier than two weeks after it rules on confidentiality, whichever is later. In support of its petition, TWA states as follows:

1. Preparation of comments in the proceeding requires review of a substantial volume of documents and pleadings in order to develop comments. The application itself is 46 pages, with an additional 15 exhibits. The applicant's response to the Department's information request, filed October 10, 1995, is 44 pages, and there are additional confidential documents, which TWA has just started to review. It has not yet been able to share the confidential documents with inside personnel who will be responsible for determining TWA's position, and providing expertise on the issues. The time frame proposed by the scheduling notice is not adequate to permit thorough review of these documents and the development of a paper that would be useful to the department. Applicants will undoubtedly argue that parties have had several weeks before the scheduling notice to prepare pleadings. However, it would have been inefficient for parties to prepare papers without knowledge of the confidential documents and before the Department established a procedural schedule.

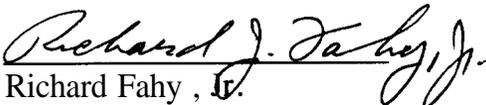
2. This is a complex and immensely important proceeding. The application for antitrust immunity goes far beyond any request for approval of joint marketing efforts. It includes revenue pooling, price fixing, capacity agreements, and joint agreements upon commission payments to third party travel agents. Each of these aspects of the agreement has a long regulatory history which will require thorough review. Moreover, the threat of antitrust immunity always raises serious competitive issues, on which other parties should be allowed adequate opportunity to comment. In

addition, TWA is considering employment of an economist to assist in preparation of the paper, who will need adequate time to analyze the issues.

3. We note that the Department's notice is dated October 13, 1995, but not served until October 16, 1995, and not received by most parties until October 17, 1995. Thus, valuable time has been lost because of the delay in serving the notice.

WHEREFORE, TWA respectfully requests that the date for the comments in this proceeding be postponed to November 16, 1995, or to two weeks after the Department's ruling on motions for confidentiality, whichever is later.

Respectfully Submitted,



Richard Fahy, Jr.
Attorney for
Trans World Airlines, Inc.

October 20, 1995

CERTIFICATE OF SERVICE

I hereby certify that I have on this day served a copy of the foregoing Petition of Trans World Airlines, Inc., upon all those named on the attached service list, via first class mail, postage pre-paid.


Amy R. Carter

October 20, 1995

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