

ORIGINAL

BEFORE THE
DEPARTMENT OF TRANSPORTATION
OFFICE OF THE SECRETARY

DEPARTMENT OF TRANSPORTATION
OFFICE OF THE SECRETARY
9200 18th Ave NW
Washington, DC 20515

63146

Joint Application of)
ALITALIA-LINEE AEREE ITALIANE-S.p.A.)
KLM ROYAL DUTCH AIRLINES)
NORTHWEST AIRLINES, INC.)
for approval of and Antitrust Immunity)
for Alliance Agreements pursuant to)
49 U.S.C. §§ 41308 and 41309)

Docket OST-1999-5674 -31

MOTION TO FILE UNAUTHORIZED DOCUMENT AND RESPONSE OF THE INTERNATIONAL ASSOCIATION OF MACHINISTS AND AEROSPACE WORKERS, AFL-CIO TO THE JOINT APPLICANTS' REPLY TO THE IAM'S ANSWER

MOTION

On September 1, 1999, Northwest Airlines, KLM Airlines and Alitalia Airlines (the "joint applicants") filed a reply to the IAM's Answer to their Application for approval of and antitrust immunity for agreements pursuant to 49 U.S.C. §§ 41308 and 41309. Their reply contains several misrepresentations and omissions material to the Department's consideration of the proposed alliance. In fairness, the IAM ought to be afforded the opportunity to respond and, accordingly, requests permission to file the instant reply.

RESPONSE

In their Reply to the **IAM's** Answer, the joint applicants fail to address the allegations made by the Department of Justice in its lawsuit against Northwest and Continental. Nor do they describe any of the effects Northwest's relationship with Continental will have upon the proposed alliance or competition. In addition, the joint applicants grossly mischaracterize the service they and Continental currently provide between the United States and Italy. Based upon the record these parties have proffered, the Department lacks the information necessary to properly and adequately assess the impact the proposed alliance will have upon competition and the public interest.

I. **The Joint Applicants Reply Is Devoid Of Any Reference To The Pending Litigation Filed By The Department Of Justice Against Northwest And Continental.**

In its Answer, the **IAM** listed the principal claims asserted in the antitrust litigation brought by the Justice Department against Northwest and Continental. None of the applicants make any mention of this lawsuit nor do they attempt to refute any of the Department of Justice's contentions regarding Northwest's control of Continental and the adverse effects such control will have upon **competition**.¹ Instead, the joint applicants only allude to the DOT's knowledge of the relationship between

¹ Northwest's silence on this matter is not overcome by Continental's Reply. The position taken in that submission does not absolve Northwest, as an applicant, of its responsibility to specifically address the antitrust claims raised by the Department of Justice.

Northwest and Continental by stating, "**The** Department is fully aware of the details regarding the commercial relationship between Northwest and Continental." Joint Reply at 5. The record to date in this proceeding, however, does not include a description of that relationship. If, as the applicants imply, the Department is relying upon evidence which has not been submitted in this case, the DOT should make such evidence part of the record and give interested parties the opportunity to review and comment on these yet to be disclosed "**details.**"

II. **The** Joint Applicants Implausibly Deny That Northwest And Continental Coordinate Their Schedules.

Notwithstanding the fact that Northwest and Continental have formed a partnership with an extensive code-sharing arrangement, the joint applicants contend that they each "**deal** with each other at **arm's** length as competitors" and that "Northwest and Continental do not coordinate schedules in the competitive **sense.**" Joint Reply at 5. Apparently, the Department is to believe that Northwest competes with Continental as vigorously as it does with any other major carrier. Consequently, according to the joint applicants, Northwest derives no benefit from its alliance with Continental.

First, that contention is belied by the manner in which Northwest, itself, advertises its partnership with Continental. According to Northwest, "**The** alliance between Northwest Airlines and Continental Airlines means more flights to more destinations, more choices, more flexibility." Fast Company Magazine,

September 1999, attached as Exhibit 1. Obviously, these advantages result from cooperation and not competition.

Second, although the joint applicants concede that Northwest and Continental coordinate their schedules, incredibly they assert that such coordination is not done in the "competitive sense," but in some other undisclosed manner. *In* order for the Department to determine the exact contours of the competitive overlap that exists between the joint applicants and Continental, it **should** require the parties to disclose, for each route flown during the past twelve months, the number of passengers ticketed on either Continental or Northwest who, in fact, traveled on a flight operated by the other carrier. Only by determining the precise amount of code-sharing between Continental and Northwest can the Department properly assess the interplay between the Northwest-Continental relationship and the proposed alliance and how that will affect competition.

Finally, Northwest attempts to discount the benefits of its code-sharing with Continental by alleging that this arrangement does not extend to flights for which their hubs serve as a passenger's point of origin or destination. Continental, however, does concede that it and Northwest "**codeshare** through the hubs for connecting service behind or beyond the **hubs.**" Continental Reply at 3-4. Obviously, the principal benefit these carriers derive from code-sharing is that it enables each airline to provide service to cities to which they do not otherwise operate. For example, for the passenger who is either

originating in Newark or connecting through Newark from Europe, code-sharing enables him to fly on Northwest through Minneapolis to any of the hundreds of cities Northwest serves from this hub. In order for the Department to determine the full extent to which this alliance may expand the existing competitive overlap, **Northwest** should be required to provide detailed information regarding the amount of code-shared traffic it has flown on each route it has operated over the past twelve months.

III. Contrary To The Assertion By The Joint Applicants, Northwest And, Continental Have Code-shared For Traffic On The Local Segments Between Their Respective Hubs.

Both Continental and Northwest contend that their **code-**sharing relationship does not include flights for which their hubs serve as both the point of origin and destination for the passenger. This assertion is belied by the flight information listed on Continental% Web site on August 20, 1999 for travel on October 10, 1999. The Web site displayed several flights between a Continental and Northwest hub which carried Continental% designator code, but were to be operated by Northwest. Daniel Akins, an airline analyst retained by the **IAM**, reviewed the same information again on September 2, 1999. At that time, the Northwest flights were removed and only those flights actually operated by Continental were listed for travel between the hub cities. Akins Declaration at ¶¶ 11-12, attached as Exhibit 2. Without speculating as to why these changes were made to Continental's Web site, the joint applicants contention that Continental and Northwest have never engaged in hub-to-hub **code-**

sharing is not true.

IV. **The** Joint Applicants Repeatedly Misrepresent The Service **They** Currently Provide Between The United States And Italy.

The joint applicants apparently believe that they can resolve the issue of competitive overlap by simply claiming that **Northwest's** designator code does not appear on any flight operated to Italy. That assertion, however, is both irrelevant and erroneous. First, the real issue is not whose designator code may appear on a flight, but rather, the extent to which a carrier participates in the ticketing and transportation of passengers on a particular route. Today, an individual can use the Northwest Web site to book a ticket from Minneapolis to Italy. In fact, there are no less than three different combinations of carriers serving these routes that are displayed on Northwest's Web site.

First, on certain flights KLM will be both the listed carrier and the actual operator for both segments. **See** Akins Declaration at Exh. B. Second, on other flights, the designator code for both segments is KLM, but the first leg (Minneapolis-Amsterdam) is operated by Northwest and the second leg (Amsterdam-Rome) is operated by **KLM**. **See** Exhibit 3. Third, on other flights, **KLM's** code is listed for both segments, but the **carrier operates** neither leg: instead, Northwest flies the **Minneapolis-Amsterdam** segment and **Alitalia** operates the second segment. Akins Declaration at Exh. B.

Similarly, on its Web site, Continental offers Minneapolis-

Rome service for which, in certain cases, the domestic leg, Minneapolis-Newark, is flown by Northwest. On both segments, however, Continental% designator code appears.

Instead of dealing with what is clearly competing U.S.-Italy service, the joint applicants claim that so long as Northwest's designator code does not appear, there is no overlap with which to contend. The fact is, however, that it is immaterial whether the code for KLM, Northwest or Continental is listed. What remains true is that through its alliances with both KLM and Continental, Northwest and **KLM** are offering the same service to Italy as are Northwest and Continental. Since Northwest is clearly ticketing and transporting passengers on U.S.-Italy routes, the joint applicants must explain how the proposed alliance affects the existing service in this market.*

CONCLUSION

If the Department is to determine the effects of the proposed alliance upon competition and the public interest, it cannot rely upon the erroneous information and superficial

² Inexplicably, the display of information Mr. Akins reviewed on Northwest% and Continental's Web sites was markedly different in August and September. On August 20 the Northwest Web-site showed Northwest% code for both the **Minneapolis-**Amsterdam segment as well as the Amsterdam-Rome portion. Moreover, on a subsequent page of the Web site, the airlines **which actually operated** each flight were displayed. By September 7, in every case but one, Northwest was no longer shown as the **listed carrier and** the information indicating which airline **actually operated the flight had** been removed. Akins Declaration at ¶¶ 8-9. In addition, information pertaining to Northwest's participation in Continental's service to Rome was also removed from Continental% Web site. Akins Declaration at ¶ 10.

analysis the joint applicants have proffered. These parties **would prefer** that the Department simply accept, without examination, their claim that the current relationships between **Northwest and** Continental, Northwest and **KLM**, Continental and **Alitalia** and Alitalia and **KLM** have little or no bearing upon the **Department's** consideration of this application. The most cursory review, however, of their overlapping service and coordination of **schedules** compels the Department to assess to what degree the aforementioned airlines are already aligned, and the extent to which **the** pre-existing alliances in conjunction with the proposed alliance will reduce competition and harm the public interest. For all the reasons stated in the instant Response and the **IAM's** previously filed Answer, the Department of Transportation should deny the! Application.

Respectfully submitted,



Robert S. Clayman
GUERRIERI, EDMOND & CLAYMAN
1625 Massachusetts Ave.
Suite 700
Washington, D.C. 20036
(202) 624-7400
fax: (202) 624-7420

Dated: September 9, 1999

CERTIFICATE OF SERVICE

I **hereby** certify that on this 9th day of September, 1999, copies of the Motion To File Unauthorized Document and Response Of The International Association of Machinists And Aerospace Workers, AFL-CIO To The Joint Reply To The **IAM's** Answer were served upon all persons named on the attached service list by first-class mail, postage prepaid.



Robert S. Clayman

George 3'. Aste
Vice President-International
Affairs
900 19th St., N.W., Suite 350
Washington, D. C. 20006

Richard J. Fahy, Jr.
Consulting Attorney
900 19th St., N.W.
Suite 350
Washington, D. C. 20006

Kathleen A. Soled
Sr. Vice President
& General Counsel
One City Centre, 18th Fl.
515 N. Sixth St.
St. Louis, MO 63101

Richard D. Mathias
Zuckert, **Scoutt & Rasenberger,**
LLP
888 17th St., N.W., Suite 600
Washington, D. C. 20006

Robert **E.** Cohn
Shaw, **Pittman,** Potts
& Trowbridge
2300 N St., N.W.
Washington, D. C. 20037

Lawrence M. **Nagin**
Executive Vice President/
General Counsel
USAirways, Inc.
Crystal Park Four
2345 Crystal Dr.
Arlington, VA 22227

Megan Rae Poldy
Associate General Counsel
Northwest Airlines, Inc.
901 15th St., N.W., Suite 310
Washington, D. C. 20005

Moffett B. Roller
Roller & Bauer
1020 19th St., N.W., Suite 400
Washington, D. C. 20036

Robert **P.** Silverberg
Bagileo, Silverberg & Goldman
1101 30th St., N.W., Suite 120
Washington, D. C. 20036

Stephen **Gelband**
Hewes, **Gelband, Lambert**
& Dann, P.C.
1000 Potomac St., N.W.
Suite 300
Washington, D. C. 20007

R. Bruce Keiner, Jr.
Crowell & Moring
1001 Pennsylvania Ave., N.W.
Washington, D. C. 20004

Elliot M. Seiden
Vice President
Law & Government Affairs
David G. Mishkin
Vice President
International Affairs
Northwest Airlines, Inc.
901 15th St., N.W., Suite 310
Washington, D. C. 20005

Paul Mifsud
Vice President, Government
& Legal Affairs
KLM Royal Dutch Airlines
2501 M St., N.W.
Washington, D. C. 20037

Pierre Murphy
One **Westin** Center
2445 M St., N.W., Suite 260
Washington, D. C. 20037

Marshall S. Sinick
Squire, Sanders and Dempsey
1201 Pennsylvania Ave., N.W.
Suite 500
Washington, D. C. 20004

Dennis N. Barnes
Morgan, Lewis & Bockius
1800 M St., N.W., Suite 600N
Washington, D. C. 20036

Nathaniel P. Breed, Jr.
Shaw, **Pittman,** Potts
& Trowbridge
2300 N St., N.W.
Washington, D. C. 20037

Robert Beckman
Bode & Beckman
1150 Connecticut Ave., N.W.
9th Floor
Washington, D. C. 20036

Theodore I. **Seamon**
Hewes, **Gelband, Lambert**
& Dann, P.C.
1000 Potomac St., N.W.
Suite **300**
Washington, D. C. 20007

James **W.** Tello
Filler, Weller & Tello, P.C.
117 N. Henry St.
Alexandria, VA 22314-0784

Hershel Kamen
Managing Director
International & Regulatory
Affairs
Continental Airlines, Inc.
1600 Smith St., HQSGV, 831F
Houston, TX 77002

Allan W. Markam
2733 36th St., N.W.
Washington, D. C. 20007-1422

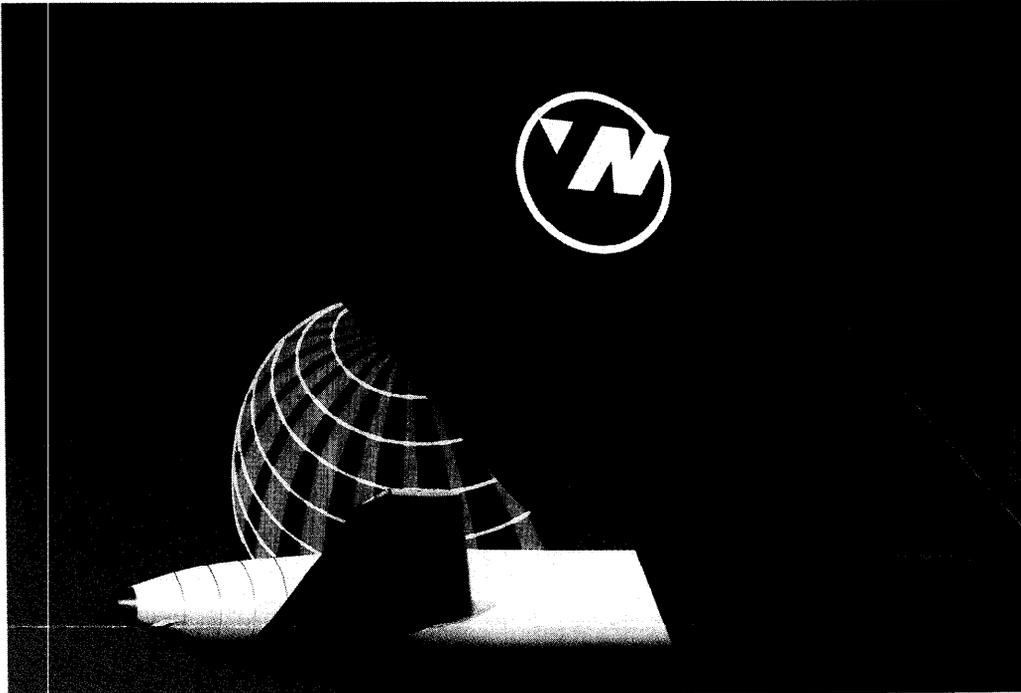
R. Tenney Johnson
2121 **K** St., N.W., Suite 800
Washington, D. C. 20037

Malcolm L. Bengé
Zuckert,, **Scoutt & Rasenberger,**
LLP
888 17th St., N.W., Suite 600
Washington, D. C. 20006

David **Kirstein**
Baker & Hostetler, LLP
1050 Connecticut Ave., N.W.
Suite **1100**
Washington, D. C. 20036

David **L.** Vaughan
Kelley, Drye & Warren
1200 19th St., N.W., Suite 500
Washington, D. C. 20036

**Free WorldPerks® miles,
no matter which airline
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The alliance between Northwest Airlines and Continental Airlines means more flights to more destinations, more choices, more flexibility. And here's the big reward: Now you can earn and redeem Northwest

The Northwest Airlines and Continental Airlines alliance puts you miles ahead.

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1-800-225-2525 / www.nwa.com

BEFORE THE
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Joint Application of)
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ALITALIA-LINEE AEREE ITALIANE-S.p.A.)
KLM ROYAL DUTCH AIRLINES)
NORTHWEST AIRLINES, INC.)

Docket OST-1999-5674

for approval of and Antitrust Immunity)
for Alliance Agreements pursuant to)
49 U.S.C. §§ 41308 and 41309)

DECLARATION OF DANIEL AKINS

Daniel Akins hereby declares, in accordance with 28 U.S.C. § 1746, as follows:

1. I am the President of Akins and Associates, a consulting firm which specializes in the transportation industry. Companies and organizations which have retained me over the past three years include Boeing, McDonnell-Douglas, Air Canada, the City of Oakland, Metropolitan Washington Airport Authority, the Air Line Pilots Association and the Transportation-Communications Union. Attached as Exhibit A is a copy of my curriculum vitae.

2. On August 20, 1999, I reviewed the schedules of Northwest and Continental regarding the service each carrier provides to Rome and Milan, Italy by logging onto the Web sites of Northwest and Continental. I also logged onto the Official Airline Guide ("OAG"). On the Northwest Web site I entered a request for a list of all Northwest flights from Minneapolis to

Rome and Minneapolis to Milan for October 10, 1999 - a randomly selected date. I also entered a request on the Continental Web site for Continental flights operated on the same routes on the same date.

3. For the requested routes, the Northwest Web site displayed only those flights for which the codes for Northwest and its partner, KLM, were listed. Similarly, the Continental Web site showed only flights for which codes for the Continental and its code-sharing partner, Alitalia, were listed.

4. On both the Northwest and Continental Web sites, I entered a request for a list of the carriers which actually operated the flights which were previously provided. In each instance, the Web site indicated on a "**Flight** Details" page which carrier actually operated that particular flight.

5. For example, on Northwest's Web page marked "**Best** Fares for your selected dates," Northwest was the carrier listed for Flights 56 (Minneapolis-Amsterdam) and 4541 (Amsterdam-Rome). On the same Web page, another option showed Flights 6056 (Minneapolis-Amsterdam) and 4541 with **KLM** as the listed carrier.

6. On a subsequent Web page marked "**Flight** Details," the carriers actually operating these flights were shown as follows: Northwest operating Flight 56 and 6056, and Alitalia operating Flight 4541. Flights 56 and 6056 are the same flight, the only difference being that when Northwest Flight 56 carries **KLM's** code it is renumbered as **KLM** Flight 6056.

7. As another example, the Continental Web page marked

****Best fares for your selected dates,**** showed Continental as the carrier whose code was listed for Flight 5770 (**Minneapolis-Newark**) and Flight 42 (Newark-Rome). On the page marked ****Flight Details,"** Northwest was shown as the operator for Flight 5770 and Continental was the operator listed for Flight 42.

8. On September 2 and 7, I again reviewed the Northwest Web-site. The display of information regarding the Minneapolis to Rome and Milan flights for travel on October 10, 1999 was markedly different from what it had been on August 20. In every instance! with one exception, where Northwest's code had been listed on the page entitled, **"Best fares for your selected dates,**** only **KLM's** code now appeared on these flights. Also, the information I had retrieved from the Northwest's Web site on August 20 concerning which airline actually operated the flight was **removed.**

9. For example, on the page entitled, ****Best fares for your selected dates,"** Flight 56 (Minneapolis-Amsterdam) and Flight 4541 (Amsterdam-Rome) which had carried Northwest's code were no longer listed. **KLM's** code, however, was still shown on Flights 6056 and 4541. See Exhibit B. In addition, the page marked, **"Flight Details**** no longer indicated that Northwest was the actual operator of Flight 6056 or that Alitalia actually flew Flight 4541. In fact, Flight 56 did not appear at all on this **page.** Instead, only **KLM** was shown as the operating carrier **for** Flights 6056 and 4541. See Exhibit C. According to the OAG, Northwest continues to operate Flight 6056 and Alitalia remains

the operator of Flight 4541.

10. As of September 7, the information on Continental's Web site had also undergone changes. On the page marked, "**Best** Fares for your selected dates," Continental's code was still shown for Flight 5770 (Minneapolis-Newark) and Flight 42 (Newark-Rome). See Exhibit D. On the page marked "**Flight Details**," however, Northwest was no longer shown as the operator for Flight 5770. Instead, on that page only Continental's name appeared above Flight 5770 as well as Flight 42, but with no information regarding which airline was actually operating these flights. See Exhibit E. According to the OAG, the actual operator of Flight 5770 is Northwest.

11. On August 20, 1999, I also requested information on the Continental Web-site regarding service between Minneapolis and Newark, Memphis and Newark, Memphis and Detroit, and Memphis and Houston. On the page entitled, "**Best** fares for your selected **flights**," all the flights listed Continental's code. On the page marked, "**Flight** Details," many of these flights showed Northwest as the actual operator.

12. On September 2, 1999, I reviewed the same information on Continental's Web site. As compared to the display shown on August 20, only flights between the hub cities of Continental and Northwest which were actually operated by Continental appeared on the page entitled, "**Best** fares for your selected **dates**."

13. Another anomaly appeared on Northwest's Web site on September 2, 1999. One option showed the **KLM** code for Flight **664**

(Minneapolis-Amsterdam) and Flight 1597 (Amsterdam-Rome). **See** Exhibit B. According to the OAG, Flights 664 and 1597 are operated by **KLM**. Another itinerary listed Flight 8664 (Minneapolis-Amsterdam) with Northwest's code. Directly beneath this flight, Flight 1597 (Amsterdam-Rome) was listed with **KLM's** code. **See** Exhibit F. Based upon the OAG, Flights 664 and 8664 are the same flight. I could not determine from the information provided on the Web site or in the OAG why Northwest's code would appear **on** some of Northwest's U.S.-Italy itineraries and not on others.

14. On August 20 when I logged onto the Web sites for Northwest and Continental, I was on vacation and did not have access to a printer. I, therefore, could not make a hard copy of the information I reviewed. By September 2, I had returned to my office and had the capability of printing from the Web. I printed Exhibits B, C, and F from the Northwest Web site and Exhibits D and E from the Continental Web site.

DANIEL W. AKINS
EXPERIENCE

Akins & Associates 1998- Present

Provide economic consulting services and data analysis for airlines, airports, labor, and related concerns. Recent projects include:

- o For Boeing Aircraft Company evaluation of **global availability** of **short-field airports**.
- o Prepared an **international market competitive analysis** for Boston Logan Airport.
- o On **Behalf** of LSG/SKY Chefs **evaluated financial benchmarking model** in support of **food and beverage contract negotiations** with a **major carrier**
- o On **behalf** of Best, Inc. **evaluated the potential intermodal impact** of **air cargo** on **rail operations** in **Joliet Illinois** and its **relationship** to the **site of a new Chicago airport**.
- o On **behalf** of Southern Air Transport prepared an **economic analysis** in support of their application **before** the U.S. DOT for **all-cargo service** between the U.S. and Argentina

AIRTRANS, INC. 1993 - 1997

Vice President - Recent projects include:

- o For the State of Virginia **evaluated competitive position** of the Commonwealth's **commercial airports** and **formulated proposals** to address **deficiencies in service**.
- o On behalf of **American Express Travel Related Services** ongoing **analysis** regarding the **use and economic impact** of **ticket redemption** through **airline frequent flyer programs**.
- o **Analytical support** for **McDonnell-Douglas Corporation** regarding the **commercial viability** of **converting military cargo aircraft (C-17)** to **civilian freight service (MD-17)**.
- o **Ongoing air service development assistance** for **Port of Oakland, California**.
- o Prepared **written economic testimony** before the U.S. DOT supporting the **successful bid** of **American International Airways** to **begin air cargo service** between the U.S. and **Brazil**
- o **Separate analysis** of the **economic benefits** to **Nashville and Phoenix** resulting from the **operation of a nonstop London route**.
- o Prepared **traffic forecast and market share analysis** of **top 100 U.S. airports** for **AT&T**.
- o **Composed model of international traffic synergy potential** for **Lufthansa German Airways** and **Davis Companies** in support of their **joint bid** for **Continental Airlines**.
- o **Prepared an evaluation of Regional Jets** for **United Airlines Pilot MEC**
- o Prepared **report for presentation** to **TWA BOD** on the **potential monetary value** and **strategic significance** of **TWA's international and domestic assets**

DANIEL W. AKINS**YIELD DATA SERVICES, INC. 1989-1993**

*Vice President - Founding Partner in airline consultancy and on-line aviation data vending firm.
Projects included:*

- o **Testimony in U.S. District Court concerning valuation of pilot compensation at several Major Airlines.**
- o **Testified as principal economist in interest arbitration of United Airlines and Pan Am pilots regarding the purchase of London Heathrow Airport operations.**
- o **Analysis of airline traffic and capacity share for Northwest Airlines in U.S. markets.**
- o **Econometric forecast of passenger and cargo traffic for Nantes, Pays de Loire, France.**
- o **Worldwide air cargo market forecast for World Airways.**
- o **Forecast near-term air cargo trade between the U.S. and several South American countries for U.S.-Brazil route case proceeding before the U.S. DOT.**
- o **Forecast of airline labor costs for Touche, Ross & Co.**
- o **Testimony in interest arbitration of Alaska Airlines - Jet America pilot seniority integration-**
- o **Testimony on behalf of Pan Am flight attendants in interest arbitration involving closure of SFO base.**
- o **Market fare analysis on behalf of Air Transport Association of America for congressional testimony.**

KURTH & COMPANY, INC. 1986 - 1988

*Manager of Aviation Research - Marketing and management consultant to air carriers and airports.
Projects included:*

- o **Analysis of fleet purchasing history at Delta Airlines.**
- o **Study regarding bankruptcy of Frontier Airlines.**
- o **Prepared traffic and financial exhibits in support of employee integration proceedings of Northwest-Republic, USAir- Piedmont, Delta- Western, and Continental-Frontier.**
- o **Testified before Postal Rate Commission on cost attribution of Third and Fourth Class Mail.**

DANIEL W. AKINS

Page 3

AIR LINE PILOTS ASSOCIATION. 1984-1986

Senior Economist - Provided technical assistance and policy analysis on economic, financial, and operational aspects of air transport industry for pilot organization. Projects included:

- o Forecasting traffic and capacity to estimate economic performance and labor requirements at various airlines.
- o Industry expert at U.S. Department of Transportation in cases regarding the employment effects of deregulation of U.S. airlines.
- o Analysis of effects of two-tier wage structures on operating costs and competition.

R.L. BANKS & ASSOCIATES, INC. 1983-1984

Transport Economist - Served in consulting capacity for corporate and public clients for economic evaluation of maritime, road, rail, and air transportation projects. Involved in all phases of consulting, from development to project evaluation and completion. Applied economic theory and econometric techniques to evaluate problems in the movement of both passengers and freight.

Projects included:

- o Economic analysis of rail-road-waterway competition to evaluate effects of selling nation's largest barge line to a large railroad.
- o Evaluation of containerized shipping through all Atlantic ports in Canada and US
- o Econometric investigation concerning retirement rates of fixed rail investments.
- o Analysis of volume of freight interchanged between Conrail and the seven largest U.S. Railroads.

EDUCATION

LONDON SCHOOL OF ECONOMICS, 1982-1983

Postgraduate Diploma in Economics, Mark of Merit Honours. Specialized in transport economics, econometric modeling and forecasting. Conducted an analysis of the need, siting and timing of a third major port in London. Studied road congestion externalities, public transit operation, urban transport planning and investment policy.

GUSTAVUS ADOLPHUS COLLEGE, 1977-1981

B.A. Cum Laude Honors, Economics. Majored in economics and urban planning. Undertook on-site analysis of relationship between urban growth patterns and highway development.

INSTITUTE OF EUROPEAN STUDIES, London, U.K., Autumn 1980

Studied European monetary relations and industrial organization at London School of Economics.

PROFESSIONAL AFFILIATIONS

Member: Austin Airport Advisory Board, Transportation Research Board, Transportation Research Forum, American Economic Association.



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Sun Minneapolis to Rome (FCO)
 10-Oct-99(MSP) Arrive 9:25 AM
 Depart 3:15 +1 day
 11h 10m PM



Flight: 664 / 1597
 Connect in Amsterdam (AMS)

Sat Rome (FCO) to Minneapolis
 30-Oct-99 Depart 6:50 (MSP)
 AM Arrive 12:55
 13h 5m PM



Flight: 1596 / 665
 Connect in Amsterdam (AMS)

[▶ Review details and purchase options.](#)



Sun Minneapolis to Rome (FCO)
 10-Oct-99(MSP) Arrive 3:00 PM
 Depart 8:55 +1 day
 11h 5m P M



Flight: 6056 / 4541
 Connect in Amsterdam (AMS)

Sat Rome (FCO) to Minneapolis
 30-Oct-99 Depart 6:50 (MSP)
 AM Arrive 12:55
 13h 5m PM



Flight: 1596 / 665
 Connect in Amsterdam (AMS)

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Sun Minneapolis to Rome (FCO)
 10-Oct-99(MSP) Arrive 3:00 PM
 Depart 3:15 +1 day
 16h 45m PM



Flight: 664 14541
 Connect in Amsterdam (AMS)

Sat Rome (FCO) to Minneapolis
 30-Oct-99 Depart 6:50 (MSP)
 AM Arrive 12:55
 13h 5m PM



Flight: 15961665
 Connect in Amsterdam (AMS)

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RESERVATIONS

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Summary

1 Ticket I
Round trip
MSP Minnreapolis
 to
FCO Rome

Leave: 1 Sun 0-Oct-99
Return: Sat 30-Oct-99

1 adult \$850.00
 Taxes \$56.38
Total cost \$906.38

OPTIONS

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Flight Details

Here is a detailed description of the flight(s) you selected, **along** with any rules and **restrictions** that apply.

1 Review the flight details

4155 Minneapolis (MSP) to Amsterdam (AMS)
 8h 0m Depart **8:55 PM** Arrive **11:55 AM**
 +1 day **Flight: 6056**

Economy/Coach Class, Dinner, Boeing 747

809 mi Amsterdam to Rome (FCO)
 2h 15m (AMS) Arrive **3:00 PM** **Flight: 4541**
 Depart **12:45 PM**

Economy/Coach Class, Airbus A320

Total miles: 4964 mi
 Total flight time: **10hr 15min** (11 hr 5min with connections)

809 mi Rome (FCO) to Amsterdam (AMS)
 2h 35m Depart **6:50 AM** Arrive **9:25 AM**
Flight 1596

Economy/Coach Class, Breakfast, Boeing 737

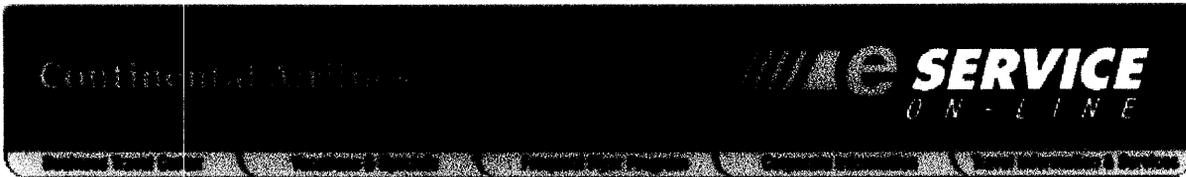
4155 Amsterdam (AMS) to Minneapolis (MSP)
 8h 40m Depart **11:15 AM** Arrive **12:55 PM**
Flight 665

Economy/Coach Class, Boeing 747

Total miles: 4984 mi
 Total flight time: **11hr 15min** (13hr 5min with connections)

2 Review the rules and restrictions

- Penalties apply.
- [View the complete rules and restrictions](#) for this fare.
- I have **read** and **accept** the **rules** and **restrictions**.



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Flight Wizard

Best fares for your selected dates

Note: These results cover a metro area with several airports. Review your choices carefully.

To find lower fares, read our [Insider's Shopping Tips](#).

Modify your search

Departing:
(MM/DD/YY)

10/10/1999

8:00 AM

Returning:
(MM/DD/YY)

10/25/1999

8:00 AM

Direct flights only

More search options

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OPTIONS

* [Build your own trip](#)
If you're having trouble finding the perfect **times**

* [Cancel](#)
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Sun Minneapolis to Rome (FCO)
1 o-act-99 (MSP) Arrive 7:40 AM
15h 25m Depart 9:15 AM +1 day

Continental
Flight: 315 / 46
Connect in Newark (EWR)

Mon Rome (FCO) to Minneapolis
25-Oct-99 (MSP) Depart 9:40 AM
14h 49m Arrive 5:29 PM

Continental
Flight: 41 / 695
Connect in Newark (EWR)

[Review details and purchase options.](#)



Sun Minneapolis to Rome (FCO)
1 o-act-99 (MSP) Arrive 7:40 AM
13h 20m Depart 11:20 AM +1 day

Continental
Flight: 5772 / 46
Connect in Newark (EWR)

Mon Rome (FCO) to Minneapolis
25-Oct-99 (MSP) Depart 9:40 AM
14h 49m Arrive 5:29 PM

Continental
Flight: 41 / 695
Connect in Newark (EWR)

[Review details and purchase options.](#)



Sun Minneapolis to Rome (FCO)
1 o-act-99 (MSP) Arrive 7:40 AM
17h 25m Depart 7:15 AM +1 day

Continental
Flight: 5766 / 46
Connect in Newark (EWR)

Mon Rome (FCO) to Minneapolis
25-Oct-99 (MSP) Depart 9:40 AM
14h 49m Arrive 5:29 PM

Continental
Flight: 41 / 695
Connect in Newark (EWR)

[Review details and purchase options.](#)



Sun Minneapolis to Rome (FCO)
1 o-act-99 (MSP) Arrive 11:45 AM
12h 5m Depart 4:40 PM +1 day

Continental
Flight: 5306 / 42
Connect in Newark (EWR)

Mon Rome (FCO) to Minneapolis
25-Oct-99 (MSP) Depart 9:40 AM
14h 49m Arrive 5:29 PM

Continental
Flight: 41 / 695
Connect in Newark (EWR)

[Review details and purchase options.](#)



Sun Minneapolis to Rome (FCO)
1 o-act-99 (MSP) Arrive 11:45 AM
12h 15m Depart 4:30 PM +1 day

Continental
Flight: 1467 / 42
Connect in Newark (EWR)

Mon Rome (FCO)
25-Oct-99 Depart **9:40 AM**
 14h 49m

to Minneapolis
(MSP)
 Arrive **5:29 PM**

Continental 
 Flight: 41 / 695
 Connect in Newark (EWR)

 [Review details and purchase options.](#)



Sun Minneapolis
 1 Oct-99 **(MSP)**
 14h 10m Depart **2:35 PM**

to Rome (FCO)
 Arrive **11:45 AM**
 +1 day

Continental 
 Flight: 5770 / 42
 Connect in Newark (EWR)

Mon Rome (FCO)
25-Oct-99 Depart **9:40 AM**
 14h 49m

to Minneapolis
(MSP)
 Arrive **5:29 PM**

Continental 
 Flight: 41 / 695
 Connect in Newark (EWR)

 [Review details and purchase options.](#)



Sun Minneapolis
 1 Oct-99 **(MSP)**
 15h 45m Depart **1:00 PM**

to Rome (FCO)
 Arrive **11:45 AM**
 +1 day

Continental 
 Flight: 5100 / 42
 Connect in Newark (EWR)

Mon Rome (FCO)
25-Oct-99 Depart **9:40 AM**
 14h 49m

to Minneapolis
(MSP)
 Arrive **5:29 PM**

Continental 
 Flight: 41 / 695
 Connect in Newark (EWR)

 [Review details and purchase options.](#)



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Flight Wizard

Summary

1 Ticket / Round trip
MSP Minneapolis to
 FCO Rome
 Leave: Sun 10-Oct-99
Return: Mon 25-Oct-99

1 adult **\$1,565.00**
 Taxes \$54.78

Total cost **\$1,619.78**

OPTIONS

* [Cancel](#)
 Go to **Overview**

Flight Details

Here is a detailed description of the flight(s) you selected, along with any rules and restrictions that apply.

1 Review the flight details



1017 mi Minneapolis to Newark (EWR)
 2h 39m (MSP) Arrive 6: 14 PM
 Depart 2:35 PM

Continental
 Flight: 5770

Economy/Coach Class, Boeing MD80

4280 mi Newark (EWR) to Rome (FCO)
 8h 5m Depart 9:40 AM Arrive 11:45 AM
 +1 day

Continental
 Flight: 42

Economy/Coach Class, Dinner, Boeing DC1 0

Total miles: 5297 mi
 Total flight time: 1 Ohr 44min (14hr 10min with connections)



4280 mi Rome (FCO) to Newark (EWR)
 9h 20m Depart 9:40 AM Arrive 1:00 PM

Continental
 Flight: 41

Economy/Coach Class, Lunch, Boeing 777

1017 mi Newark (EWR) to Minneapolis (MSP)
 3h 14m Depart 3:15 PM Arrive 5:29 PM

Continental
 Flight: 695

Economy/Coach Class, Snack, Boeing 737-300

Total miles: 5297 mi
 Total flight time: 12hr 34min (14hr 49min with connections)

2 Review the rules and restrictions

• A fee of 10 percent will be charged for itinerary cancellation after the ticket is issued.

• [View the complete rules and restrictions for this fare.](#)

I have read and accept the rules and restrictions.

3 Select a booking option

Fares are not guaranteed until purchase.

[Review preferences, then purchase.](#)

[Reserve until midnight tomorrow.](#)

When you reserve, we'll hold your seat until midnight Pacific Time tomorrow. Your fare could go up any time before you pay for this ticket. We recommend you complete your purchase now.

[Save this information in an itinerary.](#)



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RESERVATIONS

BOOK A FLIGHT

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Summary

1 Ticket / Round trip
MSP Minneapolis
 to
FCO Rome

Leave: Sun 1 Oct-99
Return: Sat 30-Oct-99

1 adult \$718.00
 Taxes \$56.38
Total cost \$774.38

OPTIONS

[Cancel](#)
[Go to Overview](#)

Flight Details

Here is a detailed description of the flight(s) you selected, along with any rules and restrictions that apply.

1 Review the flight details

4155 Minneapolis to Amsterdam
 mi **(MSP)** **(AMS)** Flight: 8664
 7h Depart 3:15 Arrive 6:10 AM
 55m P M +1 day

Economy/Coach Class, Boeing 747

809 mi Amsterdam to Rome (FCO)
 2h **(AMS)** Arrive 9:25 AM Flight: 1597
 20m Depart 7:05 AM

Economy/Coach Class, Breakfast, Boeing 737

Total miles: 4964 mi
 Total flight time: 1 Ohr 1 5min (11 hr 1 Omin with connections)

809 mi Rome (FCO) to Amsterdam
 2h Depart 6:50 **(AMS)** Flight: 1596
 35m AM Arrive 9:25 AM

Economy/Coach Class, Breakfast, Boeing 737

4155 Amsterdam to Minneapolis
 mi **(AMS)** **(MSP)** Flight: 8665
 8h Depart 11:15 Arrive 12: 55
 40m A M PM

Economy/Coach Class, Boeing 747

Total miles: 4964 mi
 Total flight time: 11 hr 1 5min (13hr 5min with connections)

2 Review the rules and restrictions

- Penalties apply.
- [View the complete rules and restrictions for this fare.](#)

I have read and accept the rules and restrictions.

Sun Minneapolis to Rome (FCO)
 10-Oct-99 **(MSP)** Arrive 6:55 PM
 Depart 8:55 +1 day
 15h 0m PM

 Flight: 6056 / 1605
 Connect in
 Amsterdam (AMS)

Sat Rome (FCO) to Minneapolis
 30-Oct-99 Depart 6:50 **(MSP)**
 AM Arrive 12:55
 13h 5m PM

 Flight: 1596 / 665
 Connect in
 Amsterdam (AMS)

[▶ Review details and purchase options.](#)



Sun Minneapolis to Rome (FCO)
 10-Oct-99 **(MSP)** Arrive 8:55 PM
 Depart 8:55 +1 day
 17h 0m P M

 Flight: 6056 / 4543
 Connect in
 Amsterdam (AMS)

Sat Rome (FCO) to Minneapolis
 30-Oct-99 Depart 6:50 **(MSP)**
 AM Arrive 12:55
 13h 5m PM

 Flight: 1596 / 665
 Connect in
 Amsterdam (AMS)

[▶ Review details and purchase options.](#)



Sun Minneapolis to Rome (FCO)
 10-Oct-99 **(MSP)** Arrive 10:40
 Depart 8:55 PM
 18h 45m PM +1 day

 Flight: 6056 / 1609
 Connect in
 Amsterdam (AMS)

Sat Rome (FCO) to Minneapolis
 30-Oct-99 Depart 6:50 **(MSP)**
 AM Arrive 12:55
 13h 5m PM

 Flight: 1596 / 665
 Connect in
 Amsterdam (AMS)

[▶ Review details and purchase options.](#)



Sun Minneapolis to Rome (FCO)
 10-Oct-99 **(MSP)** Arrive 9:25 AM
 Depart 3:15 +1 day
 11h 10m PM

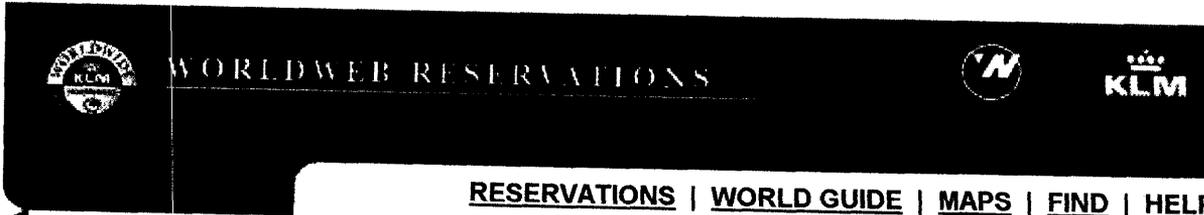
 Flight: 8664


 Flight: 1597
 Connect in
 Amsterdam (AMS)

Sat Rome (FCO) to Minneapolis
 30-Oct-99 Depart 6:50 **(MSP)**
 AM Arrive 12:55
 13h 5m PM

 Flight: 1596





RESERVATIONS

BOOK A FLIGHT

Modify your search

Departing:

(MM/DD/YY)

10/10/1999

7:00 AM

Returning:

(MM/DD/YY)

10/30/1999

7:00 AM

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Sun **Minneapolis**
10-Oct-99**(MSP)**

12hOm **Depart 3:15 PM**

Sat **Milan (LIN)**
30-Oct-99**Depart 6:55 AM**
13hOm



Sun **Minneapolis**
10-Oct-99**(MSP)**

13h 5m **Depart 3:15 PM**

sat **Milan (LIN)**
30-Oct-99**Depart 6:55 AM**
13h Om



Sun **Minneapolis**
10-Oct-99**(MSP)**

11h 45m **Depart 8:55 PM**

Sat **Milan (LIN)**
30-Oct-99**Depart 6:55 AM**
13h Om



to **Milan (LIN)**
Arrive 10:15 AM
+1 day

Flight: 664 / 1623
Connect in Amsterdam **(AMS)**

to **Minneapolis (MSP)**
Arrive 12:55 PM

Flight: **4530** / 665
Connect in Amsterdam **(AMS)**

[▶ Review details and purchase options.](#)

to **Milan (LIN)**
Arrive 11:20 AM
+1 day

Flight: 664 / **4531**
Connect in Amsterdam **(AMS)**

to **Minneapolis (MSP)**
Arrive 12:55 PM

Flight: 4530 / 665
Connect in Amsterdam **(AMS)**

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to **Milan (LIN)**
Arrive 3:40 PM
+1 day

Flight: 6056 / 1627
Connect in Amsterdam **(AMS)**

to **Minneapolis (MSP)**
Arrive 12:55 PM

Flight: 4530 / 665
Connect in Amsterdam **(AMS)**

[@ Review details and purchase options.](#)