

DEPT. OF TRANSPORTATION

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BEFORE THE
U.S. DEPARTMENT OF TRANSPORTATION
WASHINGTON, DC

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Applications of)
)
)
AMERICA WEST AIRLINES, INC.)
AMERICAN AIRLINES, INC.)
AMERICAN TRANS AIR, INC.)
DELTA AIR LINES, INC.)
FRONTIER AIRLINES, INC.)
NATIONAL AIRLINES, INC.)
NORTHWEST AIRLINES, INC.)
TRANS WORLD AIRLINES, INC.)
UNITED AIR LINES, INC.)
)
)
 for exemptions from Subparts K & S of)
 14 CFR Part 93 pursuant to 49 U.S.C. 41718)
 (beyond-perimeter slot exemptions))
)

Docket No. OST-2000-7181 -49

ANSWER OF
THE LAS VEGAS PARTIES
(LAS VEGAS McCARRAN INTERNATIONAL AIRPORT,
THE LAS VEGAS CHAMBER OF COMMERCE,
THE LAS VEGAS VISITOR AND CONVENTION AUTHORITY, AND
THE NEVADA DEVELOPMENT AUTHORITY)

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Dated: 22 May, 2000

McCarran International Airport (LAS) using slots available under the slot exemptions provided under § 41718 of the Transportation Code (49 U.S.C. § 41718).

On May 3, 2000, National Airlines filed for an exemption from 49 U.S.C. 49104(a)(5), 49109, 49111(e) and 41714, and Subparts K and S of 14 C.F.R. Part 93 to allow them to operate three daily nonstop round trip services between DCA and LAS. These flights would be operated with state-of-the-art Boeing B757 aircraft with 175 seats in two classes.

On May 5, 2000, America West Airlines filed for exemption under the same provisions to allow them to operate two daily nonstop roundtrips between DCA and LAS with 190-seat B757 aircraft having two classes.

The Wendell H. Ford Aviation Investment and Reform Act for the 21st Century ("AIR 21") requires the Department to grant twelve slot exemptions on routes between DCA and domestic hub airports located beyond the existing 1,250-mile DCA perimeter. The objectives of the Congress in providing these additional slot exemptions is clearly set forth and framed by § 41718 (a):

1. "... to operate limited frequencies and aircraft on selected routes between Ronald Reagan Washington National Airport and domestic hub airports . . ."
2. "(1) provide air transportation with domestic network benefits in areas

beyond the perimeter . . .”

3. “(2) increasing competition by new entrant air carriers or in multiple markets;”
4. “(3) not reduce travel options for communities served by small hub airports and medium hub airports within the perimeter . . .”
5. “(4) not result in meaningfully increased travel delays.”

The award of services as requested by National Airlines and America West Airlines would allow the Department to maximize its opportunity to fulfill these objectives as established by Congress.

The Las Vegas applicants should be granted their respective slot exemptions for the following reasons:

1. The applications of American Airlines, Delta Airlines, Northwest Airlines, Trans World Airlines and United Airlines for services to Los Angeles, Salt Lake City and Seattle should be rejected on the basis that they do not provide increased competition by new entrant air carriers. Each of these carriers operate significant capacity from DCA today.

2. The service proposed by Frontier from Denver should be rejected since, among other weaknesses, it offers service with B737-300 aircraft having only 136 seats. Thus, while Frontier is a new entrant low fare carrier, it cannot be expected to match either the price or comfort for the local or beyond network markets that can be provided by both National Airlines (offering 175 seats) and America West (offering 190 seats) with B757-200 aircraft. Clearly, this proposal is lacking in both adequate capacity in terms of seats, compared to the proposed B757 service to Las Vegas, and it additionally lacks the comfort provided by the B757. Consequently, given the limited nature of the public resource that is available in terms of DCA slots beyond the 1,250-mile perimeter, there is little justification for allocating any of those limited resources to services that cannot compete on the basis of quality, low cost and comfort with the proposed services from Las Vegas.

3. Nonstop service to Las Vegas by National Airlines and/or America West Airlines satisfies the unique requirements that there be network benefits from a domestic hub and new entrant competition. Both are new entrants, as defined by Conference Report Language Section 231, and both carriers are new entrants in the sense that one has been operating for less than one year, and the other is one of the

sole surviving carriers of the post-1978 Deregulation Act era.

4. Las Vegas is the fastest growing community in the United States in terms of population, second fastest growing in terms of households, and 8th fastest growing in terms of Retail Sales.
5. Las Vegas has added very significant hotel and convention facility capacity during the past two years, and consequently has the capability to satisfy both the business convention and leisure tourism market demand from the Washington Area.
6. Providing the slot exemptions to Las Vegas will ensure lower air fares for the consumer since Las Vegas is home to the large domestic network operations of Southwest Airlines, America West Airlines, and the new entrant all-B757 operator National Airlines, which is already operating 11 aircraft. No destination other than Las Vegas beyond the 1,250-mile perimeter can claim a market share of 49% by low fare and/or new entrant carriers.
7. Long-haul Las Vegas services to the eastern part of the country operate at some of the highest load factors in the U.S. domestic industry. Moreover, current Las Vegas-Washington area nonstop flights have the highest load factors among the beyond-perimeter

applicant cities. Consequently, Las Vegas cannot grow as a community or serve the entire Washington market adequately until it receives additional capacity. That capacity would come in the form of B757 services from National Airlines (three round trips per day) and America West (two round trips per day).

In summary, for all of the foregoing reasons, The Las Vegas Parties fully endorse the proposals of National Airlines and America West Airlines for B757 service from Las Vegas to Ronald Reagan Washington National Airport. More detailed supporting data and information is provided in the enclosed Testimony of the Las Vegas Parties and attendant Exhibits.

Respectfully submitted:



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CERTIFICATE OF SERVICE

I hereby certify that I have on this date served a copy of the foregoing Answer of The Las Vegas Parties on all persons named on the attached Service List by causing copies to be sent by hand or by Federal Express overnight delivery.



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DATED: May 22, 2000

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LAS VEGAS

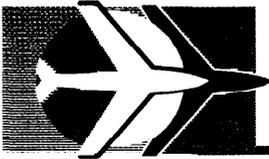


Answer, Testimony And Exhibits Of The Las Vegas Parties

**Before The U.S. Department Of Transportation
Ronald Reagan Washington National Airport
Beyond-Perimeter Slot Exemption Proceeding**

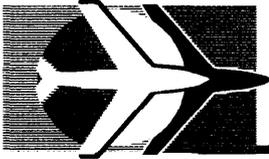
Docket OST-2000-7181

May 22, 2000



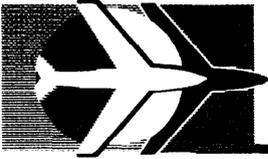
Ronald Reagan Washington National Airport Beyond-Perimeter Slot Exemption Proceeding

Exhibit Number	Title/Description	Number of Pages
LAS-DT	Direct Testimony Of Randall H. Walker	9
LAS-I 00	Introduction To Series 100 Exhibits	2
LAS-I 01	Las Vegas - Open 24 Hours A Day!	1
LAS-I 02	Las Vegas Sightseeing	1
LAS-I 03	Las Vegas Shopping	1
LAS-I 04	Las Vegas Area Map & Visitor's Guide	1
LAS-I 05	Las Vegas World Class Family Entertainment	1
LAS-I 06	Las Vegas Shows	1
LAS-I 07	Las Vegas Entertainment Guide	1
LAS-I 08	Las Vegas Has The Most Extravagant Mega-Resorts	1
LAS-I 09	Las Vegas: A Golfer's Paradise	1
LAS-I 10	Las Vegas Golf Brochure	1
LAS-I 11	Las Vegas Is A Day Trip Away From Major National Parks And Attractions	1
LAS-I 12	Las Vegas Leads The U.S. In Growth: A Summary	1
LAS-I 13	Las Vegas: A High Quality Of Life Makes Southern Nevada An Ideal Place To Live	1
LAS-114	Las Vegas Key Demographic Statistics	1
LAS-I 15	Las Vegas Population Growth	1
LAS-116	Comparative Population And Growth Rates Between Applicant Cities	1
LAS-I 17	Las Vegas Household Growth	1
LAS-I 18	Comparative Households And Growth Rates Between Applicant Cities	1
LAS-I 19	Las Vegas Effective Buying Income (EBI) Growth	1



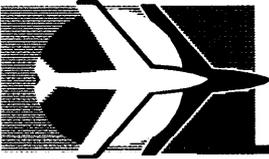
Ronald Reagan Washington National Airport *Beyond-Perimeter Slot* Exemption Proceeding

Exhibit Number	Title/Description	Number of Pages
LAS-120	Comparative EBI and Growth Rates Between Applicant Cities	1
LAS-121	Las Vegas Per Capita EBI	1
LAS-I 22	Comparative Per Capita EBI And Growth Rates Between Applicant Cities	1
LAS-I 23	Las Vegas Retail Sales Growth	1
LAS-I 24	Comparative Retail Sales And Growth Rates Between Applicant Cities	1
LAS-I 25	Las Vegas Employment Growth	1
LAS-126	Comparative Employment And Growth Rates Between Applicant Cities	1
LAS-127	Las Vegas Named "Most Livable Big City In America" By Federal Reserve Bank Study	1
LAS-I 28	Las Vegas: Growing . . . And . . . Growing . . . And . . . Growing	1
LAS-129	Las Vegas Ranks First In Population & Household Growth	1
LAS-I 30	Las Vegas: Not Just A Place To Play	1
LAS-I 31	Nevada Means Business	1
LAS-132	Las Vegas Employment	1
LAS-I 33	Las Vegas Job Growth	1
LAS-I 34	Las Vegas Projected Job Growth	1
LAS-I 35	Comparative Job Growth Between Applicant Cities	1
LAS-I 36	Las Vegas Hotel Room Growth	1
LAS-I 37	Las Vegas Continues To See Hotel Room Expansion	1
LAS-138	17 Conventions With 10,000 Or More Attendees In 2000	1
LAS-I 39	Las Vegas Visitor Growth	1
LAS-140	Summary Table Of Notable Visitor Demographics	1



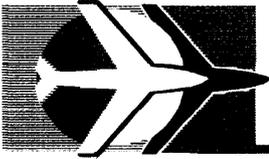
Ronald Reagan Washington National Airport Beyond- Perimeter Slot Exemption Proceeding

Exhibit Number	Title/Description	Number of Pages
LAS-141	Las Vegas = Visitor Satisfaction	1
LAS-142	Las Vegas Is Served By 18 Domestic Airlines	1
LAS-I 43	Las Vegas Is Served By 7 International Airlines	1
LAS-144	Las Vegas Offers Service To 70 Nonstop Domestic Destinations	1
LAS-I 45	Las Vegas Offers Service To 5 Nonstop Foreign Destinations	1
LAS-146	Las Vegas Has 371 Daily Domestic Departures	1
LAS-147	Las Vegas Total Domestic Passengers And Growth Rates	1
LAS-I 48	Las Vegas Is The 16th Busiest Airport In The World	1
LAS-149	Las Vegas Total Passenger Market Share: YE 3Q99	1
LAS-200	Introduction To Series 200 Exhibits	1
LAS-201	Las Vegas-Washington Area O&D Fares Have Declined	1
LAS-202	LAS-DCA O&D Fares Have Risen Without Nonstop Service	1
LAS-203	LAS-DCA O&D Fares Have Risen More Than Other Cities' Fares	1
LAS-204	While LAS-DCA O&D Yields Are The 2nd Highest Of The 7 Cities	1
LAS-205	And LAS-DCA O&D Fares Are The 3rd Highest In Absolute Terms	1
LAS-206	Major LAS-West Coast Markets Have Low Fares For Onward Trips	1
LAS-300	Introduction To Series 300 Exhibits	3
LAS-301	On A System Basis, The Major Carriers Are Substantially Larger Than The New Entrant Carriers	4
LAS-302	The Major Carrier Applicants Already Have Far More DCA Slots Than The New Entrant Applicants	1
LAS-303	The Major Carriers Already Carry Far More DCA Passengers Than The New Entrant Applicants	1
LAS-304	American's Proposed LAX-DCA Nonstops Look Suspiciously Like Current LAX-IAD Nonstops	2



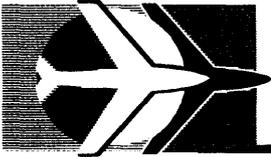
Ronald Reagan Washington National Airport Beyond- Perimeter Slot Exemption Proceeding

Exhibit Number	Title/Description	Number of Pages
LAS-305	Delta's Proposed SLC-DCA Nonstops Look Suspiciously Like Current SLC-IAD Nonstops	2
LAS-306	United's Proposed LAX-DCA Nonstops Look Suspiciously Like Current LAX-IAD Nonstops	2
LAS-307	Awarding Slots To Northwest Will Not Maximize Public Benefits	1
LAS-308	American's Six Behind-LAX Jet Connecting Markets Already Have Frequent Service To DCA	1
LAS-309	American's 4 Behind-LAX Markets Receiving 1st Online, One-Stop Service To DCA Are Very Small	1
LAS-310	Northwest Itself Does Not Serve Any City From SEA That It Claims Will Benefit From SEA-DCA Service	2
LAS-311	Northwest's 3 Behind-SEA Markets Receiving 1st Online, One-Stop Service To DCA Are Very Small	1
LAS-312	TWA's Total Of Six Behind-LAX Markets Will Offer Little Support To Its Proposed LAX-DCA Service	1
LAS-313	United's Six Largest Behind-LAX Connecting Markets Have Better Service On Nonstops To IAD	3
LAS-314	90% Of United's Projected Pool Of LAX-DCA Connecting Traffic Already Has Equal Or Better Service To Washington	1
LAS-315	United Alone Already Has More LAX-Washington Nonstops Than LAS Has In Total	1
LAS-316	DCA Slots Should Only Go To Low Fare, New Entrant Carriers	1
LAS-317	On A System Unit Cost Basis, The New Entrant Applicants Are More Efficient Than The Major Carriers	1
LAS-318	Frontier's Proposed DEN-DCA Nonstops Look Suspiciously Like Current DEN-BWI Nonstops	2
LAS-319	Awarding Slots To Frontier Will Not Maximize Public Benefits	1



Ronald Reagan Washington National Airport Beyond-Perimeter Slot Exemption Proceeding

Exhibit Number	Title/Description	Number of Pages
LAS-320	DOT Can Avoid Creating A New Monopoly Market At DCA By Selecting Both Low Fare, New Entrant Applicants At LAS	1
LAS-321	Single-Plane Service In The LAS-DCA Market Is Very Limited	1
LAS-322	The LAS-DCA Market Has Among The Fewest One-Stop Flights	3
LAS-323	The LAS-Washington Area Market Has Fewer Nonstops Than Most Of The Applicant Cities	3
LAS-324	LAS-Washington Area O&D Passengers Had The Most Growth	1
LAS-325	LAS-Washington Area O&D Passengers Have Grown	1
LAS-326	LAS-DCA O&D Passengers Have Declined Without Nonstop Service	1
LAS-327	LAS-Washington Area Nonstops Generate High Load Factors	1
LAS-328	At Least 65% Of United's LAS-IAD Onboard Passengers Are Through Or Connecting, Limiting Seats For Local Passengers	1
LAS-329	LAS-DCA Connections Involve Circuitry Of Up To 53%	2
LAS-330	Both LAS-DCA Applicants Are "New Entrants"	1
LAS-331	Summary Of LAS-DCA Nonstop Service Proposals	1
LAS-332	The LAS-DCA Applicants Are Successful East Coast Operators	3
LAS-333	Las Vegas Generates High Load Factors To The East	1
LAS-334	The LAS-DCA Applicants Serve Many Markets Behind LAS	3
LAS-335	If DOT Grants The Requested Slots To The LAS Applicants, Then The Other Applicant Carriers Offer Little Incremental Value	5
LAS-336	LAS-Washington Area Nonstops Had The Highest Load Factors	1
LAS-400	Introduction To Series 400 Exhibits	1
LAS-401	Las Vegas McCarran International Airport	1
LAS-402	Key Features Of McCarran International Airport	1



Ronald Reagan Washington *National* Airport Beyond-Perimeter *Slot* Exemption Proceeding

Exhibit Number	Title/Description	Number of Pages
LAS-403	Facilities: Runway Lengths	1
LAS-404	Facilities: Recently Opened New Terminal	1
LAS-405	McCarran International Airport Layout	8
LAS-406	Facilities: Future Expansion	1
LAS-501	Letters Of Support	18

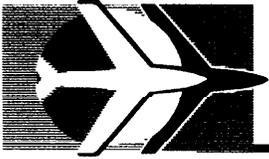


Testimony of

Randall H. Walker

Director of Aviation

Clark County Department of Aviation



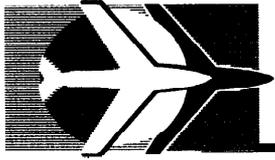
**TESTIMONY OF RANDALL H. WALKER
EXECUTIVE DIRECTOR, CLARK COUNTY DEPARTMENT OF
AVIATION**

On behalf of the Las Vegas Parties, I am pleased to submit this testimony in support of National Airlines and American West Airlines to be awarded slots for the operation of **B-757** services between Ronald Reagan Washington National Airport (**DCA**) and Las Vegas **McCarran** International Airport (**LAS**), pursuant to The Wendell H. Ford Aviation Investment and Reform Act for the 21st Century (“**AIR 21**”).

Consistent with the intent of Congress to enhance competition and network benefits through the provision of **12** additional slots for use between **DCA** and cities beyond the **1,250** mile perimeter, we strongly endorse the applications of National Airlines for three daily non-stop round trip services between **DCA** and **LAS** using **B757** aircraft and for America West Airlines for two daily non-stop round trip services between **DCA** and **LAS** using **B757** aircraft.

Las Vegas and the State of Nevada offer the Department of Transportation (the Department) a unique opportunity to satisfy the intent of Congress as set forth in **AIR 21** and the accompanying Conference Report #**106-513**.

The objectives of Congress, “to provide network benefits in areas beyond the perimeter.. .” and “increasing competition by new entrant air carriers, or in multiple markets,” are objectives readily achieved by proposed services of National Airlines and America West Airlines. Moreover, Las Vegas is the ideal destination to maximize the consumer benefits consistent with the stated objectives of Congress.



THE LEISURE DESTINATION CAPITAL

Las Vegas has an outstanding and growing infrastructure for tourism. It is open **24** hours a day with sightseeing, shopping, sports, and entertainment.

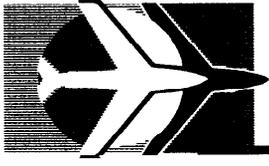
Shopping is equally attractive to the visitor from across the country and around the world. Diversity can be found in The Boulevard Mall, Paris-Las Vegas, Forum Shops and Grand Canal **Shoppes @** The Venetian, to mention just a few.

The town boasts world class family entertainment including “Battle of Buccaneer Bay,” **Caesars Palace “Omnimax Theatre,”** “MGM Grand Adventures Theme Park,” and many other historical and archeological parks and museums. Shows are famous worldwide and include such outstanding events as **Cirque Du Soleil**, Legends of **Motown**, The Three Tenors, and Siegfried and Roy.

Las Vegas boasts some of the premier hotels of the world including the newly opened Paris, **Bellagio**, Venetian, and other excellent properties such as **Luxor**, Caesar’s Palace, Treasure Island, and New York, New York.

Las Vegas is “A Golfer’s Paradise.” There are **44** high quality golf courses in the area.

Las Vegas is also close to major national parks and sightseeing attractions such as Death Valley, Lake Mead, Hoover Dam, and the Grand Canyon.



THE COMMUNITY

Las Vegas is a leader in growth among the Applicant cities in this proceeding. According to Demographics USA for 1993-1998, it ranked 1st in population growth, 2nd in Household growth, 8th in Retail Sales, and 9th in Effective Buying Income Growth, among all U.S. cities.

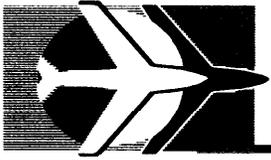
Driving this growth is a combination of factors including a lower cost of living than most western urban areas and more disposable income than comparable areas-housing costs are \$50,000 less than Los Angeles and \$100,000 less than San Diego. The sun shines 320 days a year, on average.

Equally significant, the forecast population compound annual growth rate (CAGR) for 1998 through 2003 is 3.1% for Las Vegas, significantly outstripping the growth forecasts for other competitor cities in this proceeding--2.6% for Phoenix; 1.6% for Denver; 1.3% for Salt Lake City and Seattle; 1.1% for San Francisco, and 0.7% for Los Angeles. Forecast growth rates for other key economic drivers such as Effective Buying Income, Retail Sales, and Households are equally strong.

The same can be said for employment growth rates where, according to Demographics USA, Las Vegas' employment has grown over the past five years by 6.3% per annum, a rate greater than other competitor cities in this proceeding.

Las Vegas has been named "Most Livable Big City in America," by a Federal Reserve Bank of St. Louis Study (Wall Street Journal 6/23/99). This far outstrips any competitor city in this proceeding with Phoenix 3rd, Denver 12th, Salt Lake City 20th, Seattle 22nd, San Francisco 53rd, and Los Angeles 59th.

Las Vegas is also becoming a successful business center. Since 1990, Las Vegas employment and high technology job growth have both ranked # 1 in the U.S. Gross State



Product and new business incorporations have also grown rapidly according to the Bureau of Economic Analysis and Dun and Bradstreet analysis.

Forecast data for the year 2010 projects Las Vegas job growth at 42%, while the U.S. average forecast growth is only 15.4%. In terms of the applicant cities, none are forecast to see job growth beyond the 28% level.

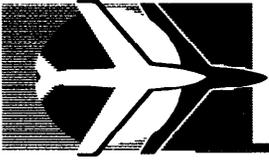
The unique vitality of Las Vegas is evidenced by the fact that visitor growth during the 1990's has been at a rate of 5.4% per annum, and during the past few years hotel capacity has been increased by almost 20,000 rooms, or approximately 20%. During the past year alone, visitor growth has been 10.5%, hotel occupancy has increased 2.2 percentage points, and convention attendance has risen by 14.3%. Moreover, according to survey data, visitors to Las Vegas evidence a high degree of satisfaction—94% are “very satisfied”.

MCCARRAN INTERNATIONAL AIRPORT

Las Vegas is served by 18 U.S. carriers offering nonstop service to 70 domestic destinations and 7 foreign air carriers (two of the seven scheduled to begin service in June of 2000) offer service to seven nonstop foreign destinations. There were 371 daily departures, on average, during the year ended third quarter of 1999, and the annual growth in departures between 1993 and the year ended third quarter of 1999 was 6.3%. Local traffic has grown by 8.5% per annum between 1993 and the year ended third quarter of 1999, and now is nearly 23 million passengers.

Las Vegas **McCarran** ranks 16th in worldwide passenger traffic, well ahead of other applicant cities other than Los Angeles and San Francisco.

Las Vegas **McCarran** International Airport is not only one of the least dominated hub airports, it is home to three significant low fare new entrant air carriers, i.e. Southwest Airlines, **America** West Airlines, and the new start-up, all B-757 operator, National Airlines.



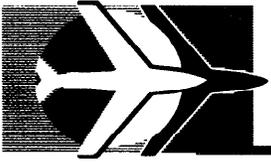
The market shares of the various carriers reflect the competitive environment with Southwest at 33%, America West at 15% and others ranging downward from United's 11%.

For the year ended third quarter of 1999, the three low fare carriers represented 50% of the market.

THE LAS VEGAS-WASHINGTON MARKET

Between 1993 and year ended third quarter of 1999, local fares in the Washington-Las Vegas market have declined by an average of 1.1% per annum; but, during the same time frame, air fares in the LAS-DCA market have risen by 1.1% per annum reflecting the fact that there is no nonstop service in the market. In addition, the annual growth rate in airfares during these same years in the LAS-DCA market has outstripped airfare growth rates in all other competitive city pair markets participating in this proceeding. And, in a further demonstration of the need for new entrant low fare competition in the Las Vegas-DCA market, the average annual increase in airfares in the Las Vegas-DCA market can be contrasted to the average annual decline in air fares in the Denver and Salt Lake City markets of roughly 5% since 1993. This increase in air fares over the past five years between DCA and Las Vegas results in DCA-LAS average yields being the second highest (PHX is the highest) of all the applicant cities.

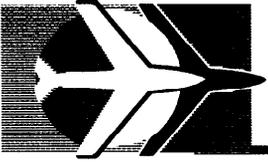
West coast markets, on the other hand, have extremely low Origin & Destination Fares to Las Vegas, thus permitting single interline connections beyond/behind Las Vegas. For example, the average fare for the year ended third quarter of 1999 for Burbank and Oakland were \$54.87 and \$51.23, respectively.



MAJOR NETWORK CARRIERS ADD LITTLE VALUE

The major network carriers, American, Delta, Northwest, TWA, and United, have applied for routes to major west coast destinations. However, these carriers' applications should be rejected on the basis that:

1. Each already has a major network in operation.
2. None of the majors satisfy the requirement for new entrant **competition that will** provide additional network benefits.
3. The largest of these network carriers, American, Delta, and United, with passenger **enplanements** in excess of **80** million per annum hardly need additional route authority in limited entry markets where they already hold large market shares.
4. Both National Airlines, a recent new start-up, and America West, generate substantially less traffic.
5. America West has **12** slots at **DCA**, and National Airlines has none. Thus, both qualify as new entrants. On the other hand, American operates **64** daily slots; Delta **92** daily slots; Northwest **40** daily slots, and United **36** daily slots.
6. In terms of total passengers at **DCA**, America West handled **74,000**, National Airlines none, while American and Delta each carried over two (**2**) million, Northwest in excess of one (**1**) million, with TWA handling roughly a half million and United almost one (**1**) million.
7. The proposed schedules of carriers such as American, Delta, and United look suspiciously like existing services to **Dulles International Airport (IAD)**, suggesting that one or more of these carriers might just move flights from one Washington Airport to another, adding nothing to the regional market capacity.
8. Northwest, on the other hand, while offering a new service fails to offer optimal benefits. While America West offers **190** seats per departure and National Airlines offers **175** seats to Las Vegas, Northwest offers only **124** seats per departure to Seattle. This is compounded by the fact that Northwest offers only



one flight per day, while National offers three, and America West, two flights per day. Finally, in its Application, Northwest claims that it will provide network benefits to a host of cities from Seattle that it does not serve from Seattle.

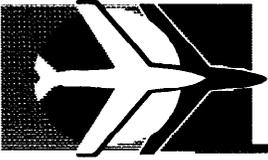
9. In the context of network benefits as set forth in the legislation, United's six largest behind LAX markets have better service to Washington via non-stop services to **Dulles**, than they would get on connections via LAX.

In summary, and for the reasons set forth above, and specified in more detail in Exhibits LAS 301-316, the applications of the major network carriers should be rejected.

THE LIMITED RESOURCES, SLOTS, SHOULD BE ALLOCATED TO NEW ENTRANT CARRIERS.

National Airlines is offering three flights per day on **B-757** aircraft with **175** seats. In addition to this quality offering, National boasts a seat mile cost of only **4.47** cents. America West, also a low cost new entrant for **DCA** is offering two flights per day and operates at a seat mile cost below 8 cents. On the other hand, the major network carriers average costs per seat mile range between 9 and 10 cents. This being the case, it will clearly be economically viable for National Airlines and America West Airlines to offer lower fares than the major network carriers over a sustained period of time.

Moreover, while Frontier's application for Denver pretends to be a competitive offering, it suffers from serious flaws. First, Frontier is already operating **DEN-BWI**, and thus could very well move its **BWI** aircraft to **DCA**, if successful. More importantly, the Department is dealing with a situation wherein it must maximize the allocation of a limited public resource. Frontier, offering **B-737** service with only **136** seats, offers substantially less capacity to the public than either National Airlines with its **175-seat** configuration or American West with its **190-seat** configuration.



SELECTING NATIONAL AIRLINES AND AMERICA WEST AIRLINES OFFERS THE DEPARTMENT THE BEST OPPORTUNITY TO MEET THE CONGRESSIONAL MANDATE AND TO MAXIMIZE THE ALLOCATION OF LIMITED RESOURCES TO ACHIEVE THE GREATEST PUBLIC BENEFIT

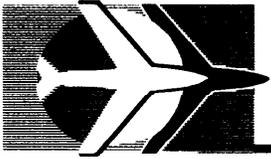
Today, single-plane service in the LAS market is extremely limited. In fact, the LAS-DCA market has **among** the fewest daily one-stop flights of any of the applicant cities -- 1 by Continental via Houston. Moreover, Las Vegas has among the fewest daily nonstop flights to the Washington area -- 5. Other applicant cities such as Denver, Los Angeles, Phoenix, and San Francisco offer between eight and **18** flights per day.

Notwithstanding this lack of capacity, Las Vegas-Washington O&D traffic has grown by an average of **14.4%** per annum during the years between **1993** and the year ended third quarter of **1999**. On the other hand, all other applicant cities have experienced only single-digit growth during these years. But, despite this growth, the LAS-DCA traffic has declined by **3.5%** per annum due to the absence of service, and the higher fares.

In further evidence of the need for LAS service to DCA, existing services to IAD and BWI are generating average load factors over the past year in excess of **80%**. In addition, the LAS-DCA passenger will suffer significant **circuitry** penalties if an award is not made to Las Vegas.

The overwhelming preponderance of public benefit can be derived by awarding DCA slots to the DCA-LAS applicants.

1. Both Las Vegas applicants are new entrants under the definition set forth in "AIR 21." America West currently has six slots and National none.



2. National Airlines with three **B757** round trip flights per day with **175** seats and America West with two round trip flights per day with **190** seats both offer solutions to a market that is suffering inadequate capacity, relatively high load factors, and higher than justified fares.
3. The ability of the Las Vegas carriers to successfully serve the market can be demonstrated by the fact that both currently serve major east coast markets successfully.
4. Currently, the Las Vegas-east coast markets are experiencing load factors generally in excess of **70%** and, in a number of cases, in excess of **80%**.
5. Finally, the Las Vegas applicants serve or provide network benefits to beyond Las Vegas markets and the addition of Las Vegas non-stop services to **DCA** is sorely needed to alleviate an extremely high **80%** load factor situation in the Las Vegas-Washington area market. Alternatively, load factors in other applicant city markets fall below this **80%** level and, in the case of Salt Lake City, below **60%**.

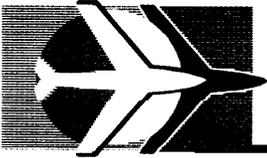
SUMMARY

In summary, and for all of the reasons cited above, Las Vegas should be awarded slots to Ronald Reagan Washington National Airport. Las Vegas, and the applicant carriers proposing service to Las Vegas, offer the best opportunity for the Department to satisfy the parameters set forth by Congress and to maximize network benefits and promote competition. Las Vegas is the only city where the applicant carriers are both low cost new entrants that can offer a competitive spur to the major network carriers and thus enhance the public benefits through lower airfares.



The Las Vegas Strip

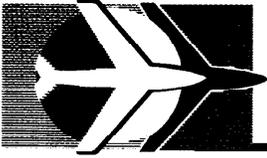
Series **100** Exhibits'



Introduction To Series 100 Exhibits

Las Vegas has an outstanding and growing infrastructure for tourism. It is open **24** hours a day with sightseeing, shopping, sports, and entertainment. Shopping is equally attractive to the visitor from across the country and around the world (Exhibits **LAS-101** to **LAS-104**). Las Vegas boasts some of the premier hotels of the world, and offers world class family entertainment including “Battle of Buccaneer Bay,” **Caesars** Palace “Omnimax Theatre,” “**MGM** Grand Adventures Theme Park,” and many other historical and archeological parks and museums. Shows are famous worldwide and include such outstanding events as **Cirque Du Soleil**, Legends of **Motown**, The Three Tenors, and Siegfried and Roy. Las Vegas is “A Golfers Paradise” with **44** high quality golf courses in the area. It is also close to major national parks and sightseeing attractions such as Death Valley, Lake Mead, Hoover Dam, and the Grand Canyon (Exhibits **LAS-105** to **LAS-I 11**).

Las Vegas is a leader in growth among the applicant cities in this proceeding. According to Demographics USA for **1993-1998**, it ranked first in Population growth, **2nd** in Household growth, **8th** in Retail Sales, and **9th** in Effective Buying Income Growth, among all U.S. cities. Driving this growth was a combination of factors including a lower cost of living than most western urban areas and more disposable income than comparable areas (Exhibits **LAS-I 12** to **LAS-124**).

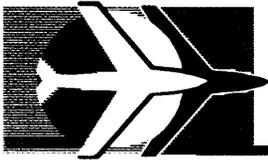


Introduction To Series 100 Exhibits

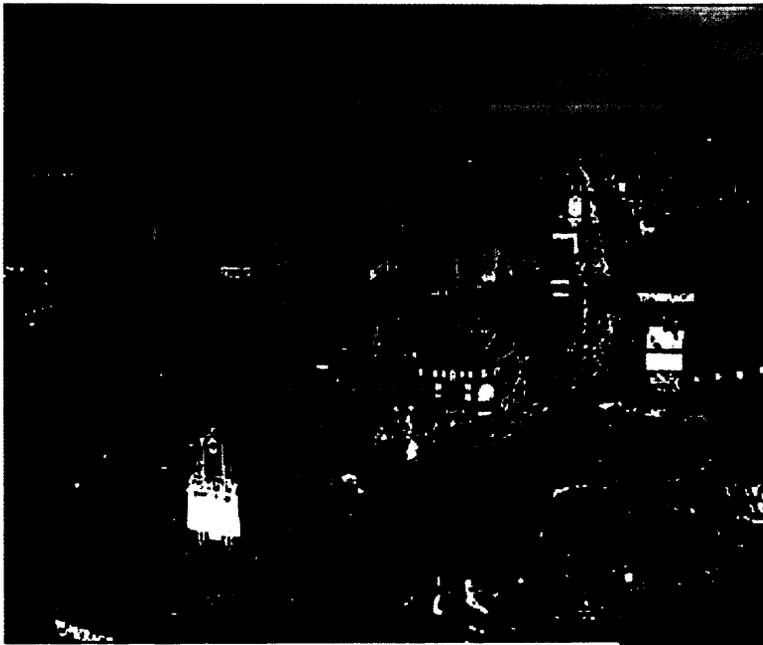
Equally important, the forecast population compound annual growth rate (CAGR) for 1998 through 2003 is 3.1% for Las Vegas, significantly outstripping the growth forecasts for other competitor cities in this proceeding. Forecast growth rates for other key economic drivers such as Effective Buying Income, Retail Sales, and Households are equally strong. The same can be said for employment growth rates where, according to Demographics USA, Las Vegas' employment has grown over the past five years by 6.3% per annum, a rate greater than other competitor cities in this proceeding. Forecast data for the year 2010 projects Las Vegas job growth at 42%, while the U.S. average forecast growth is only 15.4%. In terms of the other applicant cities, none are forecast to see job growth beyond the 28% level (Exhibits LAS-125 to LAS-135).

The unique vitality of Las Vegas is evidenced by the fact that visitor growth during the 1990's has been at a rate of 5.4% per annum, and during the past few years, hotel capacity has increased by almost 20,000 rooms, or approximately 20% (Exhibits LAS-I 36 to LAS-141).

Las Vegas is served by 18 U.S. carriers (including three major low fare, new entrant operators) offering nonstop service to 70 domestic cities, and by 7 foreign air carriers (two of which are scheduled to begin service in June 2000) offering nonstop flights to seven foreign cities. There were 371 average daily departures during the year ended third quarter of 1999. Local traffic grew by 8.5% yearly between 1993 and the year ended third quarter of 1999, and now totals nearly 23 million annual passengers, ranking Las Vegas 16th in worldwide passenger traffic. The three low fare carriers handled 49% of Las Vegas' domestic traffic (Exhibits LAS-142 to LAS-149).



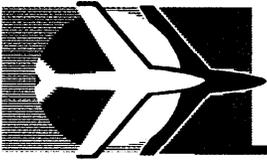
Las Vegas - Open 24 Hours A Day!



*NEON LIGHT
CAPITAL OF THE
WORLD*



*EYE-CATCHING
ARCHITECTURE*



Las Vegas Sightseeing

- Paris
- New York,
New York
- Luxor
- Venetian
- Bellagio
- Caesar's
Palace
- Treasure
Island

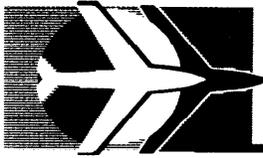




Las Vegas Shopping

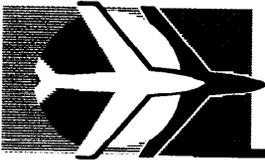
- The Boulevard Mall
- Paris - Las Vegas
- Forum Shops at Caesars
- The Fashion Show Mall
- Grand Canal Shoppes @ the Venetian





Las Vegas Area Map & Visitor's Guide

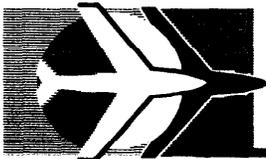




Las Vegas World Class Family *Entertainment*

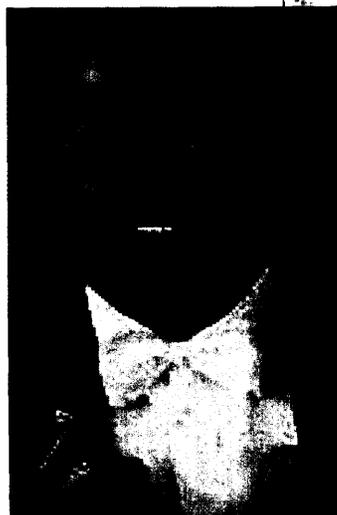
- Battle of Buccaneer Bay
- Caesars Palace Omnimax Theatre
- Bellagio Gallery of Fine Art
- MGM Grand Adventures Theme Park
- Nevada Zoological Foundation
- Lost City Museum of Archaeology
- Las Vegas Natural History Museum

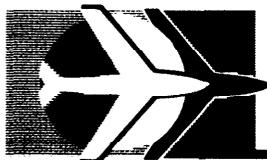




Las Vegas Shows

- Cirque Du Soleil
- Legends of Motown
- The Three Tenors
- Houdini Lives Again
- Siegfried & Roy
- Tina Turner
- Lord of the Dance
- A Tribute to Elvis





Las Vegas *Entertainment* Guide

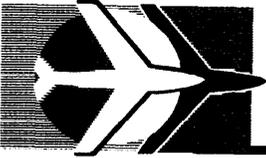
OFFICIAL GUIDE TO ENTERTAINMENT
EVENTS AND GAMING TOURNAMENTS

Las vegas SHOW guide

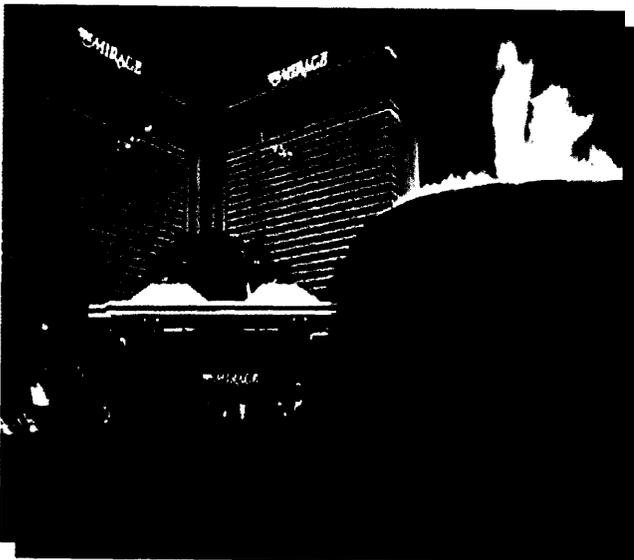
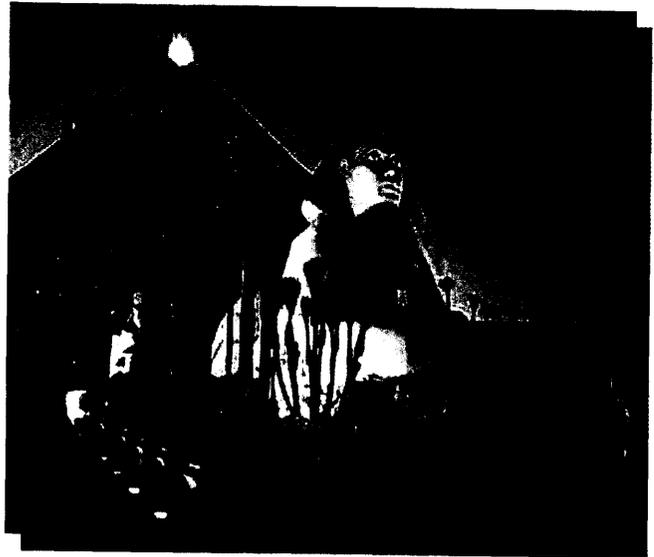
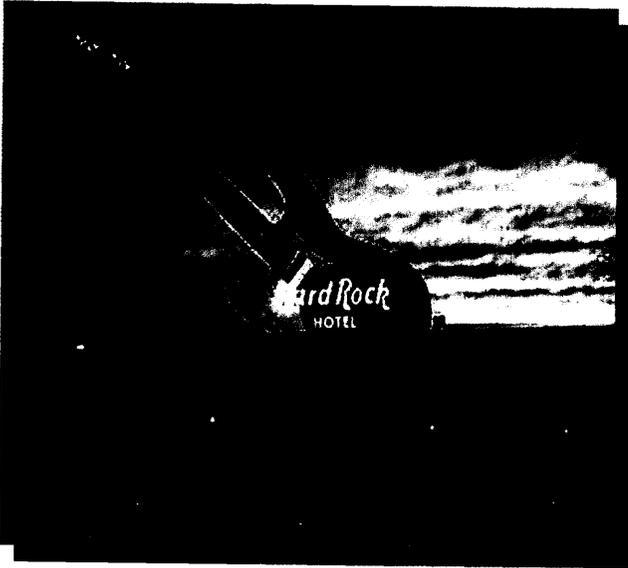


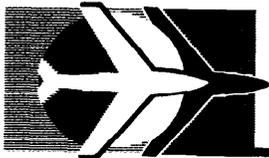
SECOND QUARTER 2000 AND BEYOND

The complex block is a vertical graphic with a dark, textured background. At the top, it reads "OFFICIAL GUIDE TO ENTERTAINMENT EVENTS AND GAMING TOURNAMENTS" in a small, white, sans-serif font. Below this is the main title "Las vegas SHOW guide" in a large, white, stylized font. The word "Las" is on the first line, "vegas" on the second, "SHOW" on the third, and "guide" on the fourth. In the lower-left quadrant, there is a circular, illuminated sign that says "Fabulous LAS VEGAS NEVADA". At the bottom, the text "SECOND QUARTER 2000 AND BEYOND" is written in a small, white, sans-serif font.

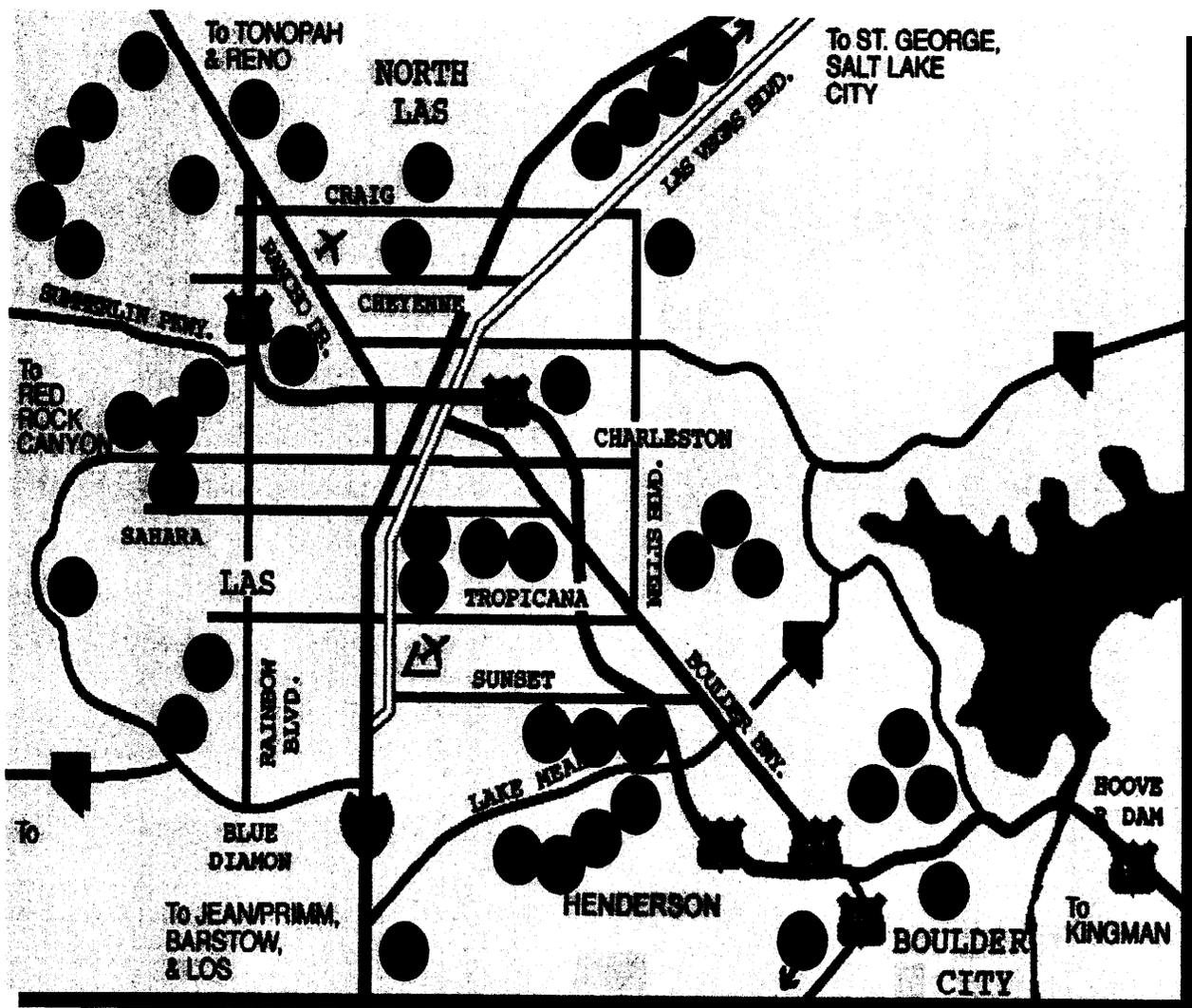


Las Vegas Has The *Most* Extravagant *Mega-Resorts*

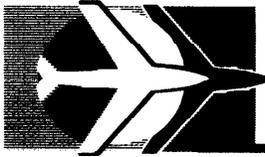




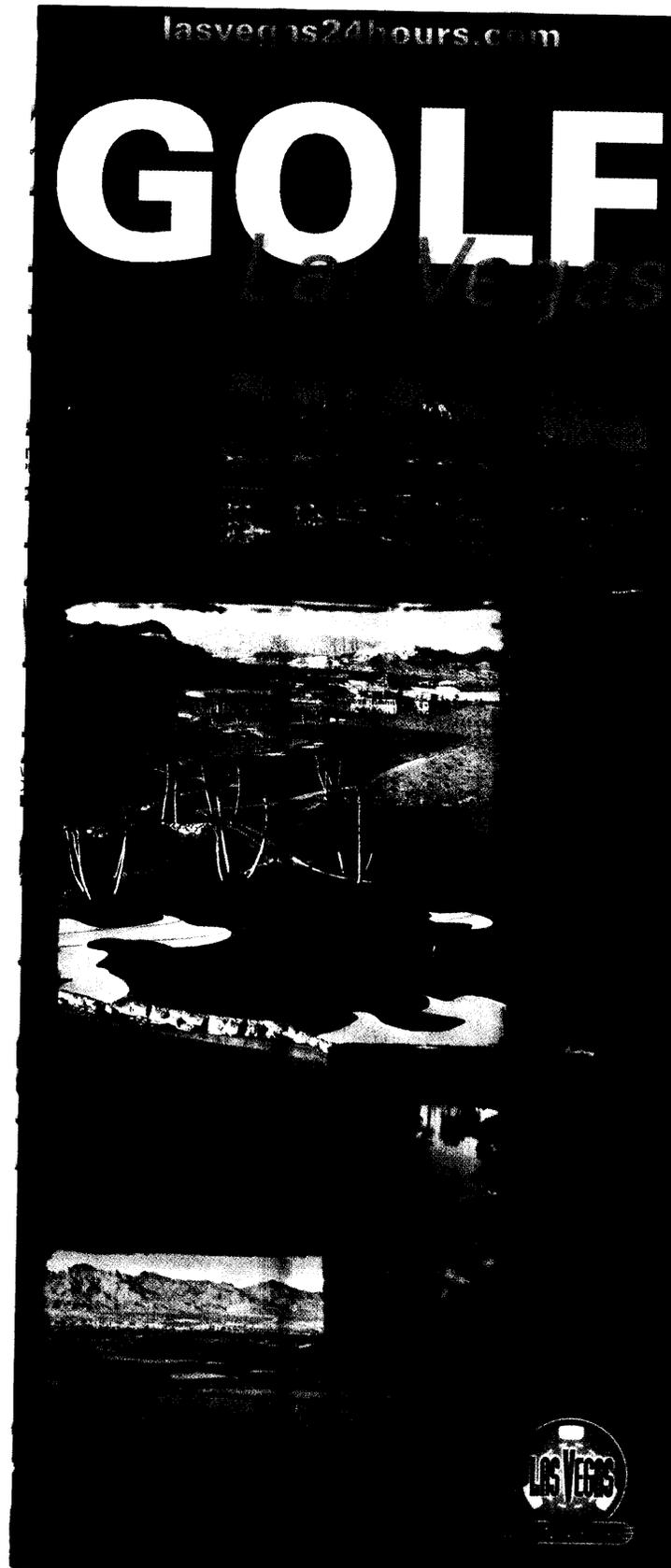
Las Vegas: A Golfer's Paradise

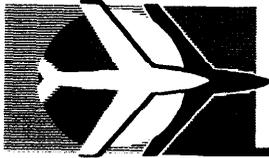


***44 High Quality Golf Courses in the
Las Vegas Area!***



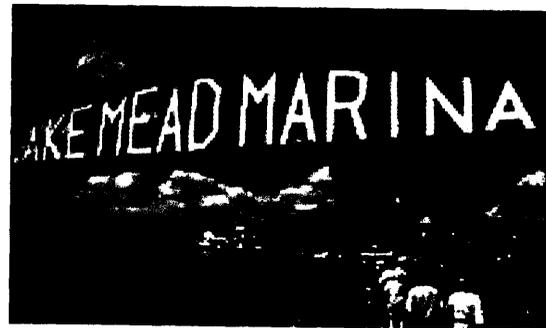
Las Vegas Golf Brochure

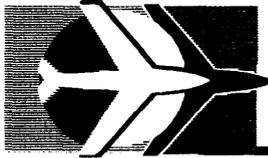




Las Vegas Is A Day Trip Away From Major National Parks And Attractions

- Death Valley
- Lake Mead
- Hoover Dam
- Grand Canyon
- Mt. Charleston
- Red Rock Canyon
- Valley of Fire State Park



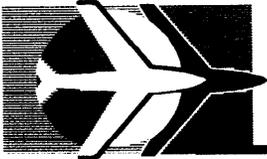


Las Vegas leads The US In Growth: A Summary

CATEGORY	RANK ^{1/}		
	1998 Current	2003 Projected	Growth Rate
<i>Population</i>	41	33	1st
<i>Households</i>	39	33	2nd
<i>Retail Sales</i>	36	32	8th
<i>EBI</i>	44	38	9th

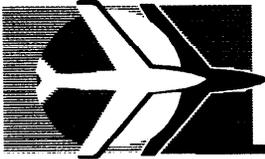
^{1/} Versus other US cities

Source: Demographics USA 1999 - County Edition



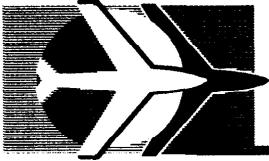
Las Vegas: A High Quality Of Life Makes Southern Nevada An *Ideal Place To Live*

- **Lower cost of living than most western urban areas**
- **More disposable income than comparable areas; housing \$50k less than Los Angeles & \$100k less than San Diego**
- **Annual average of 320 sunshine days**
- **Ample recreational activities**



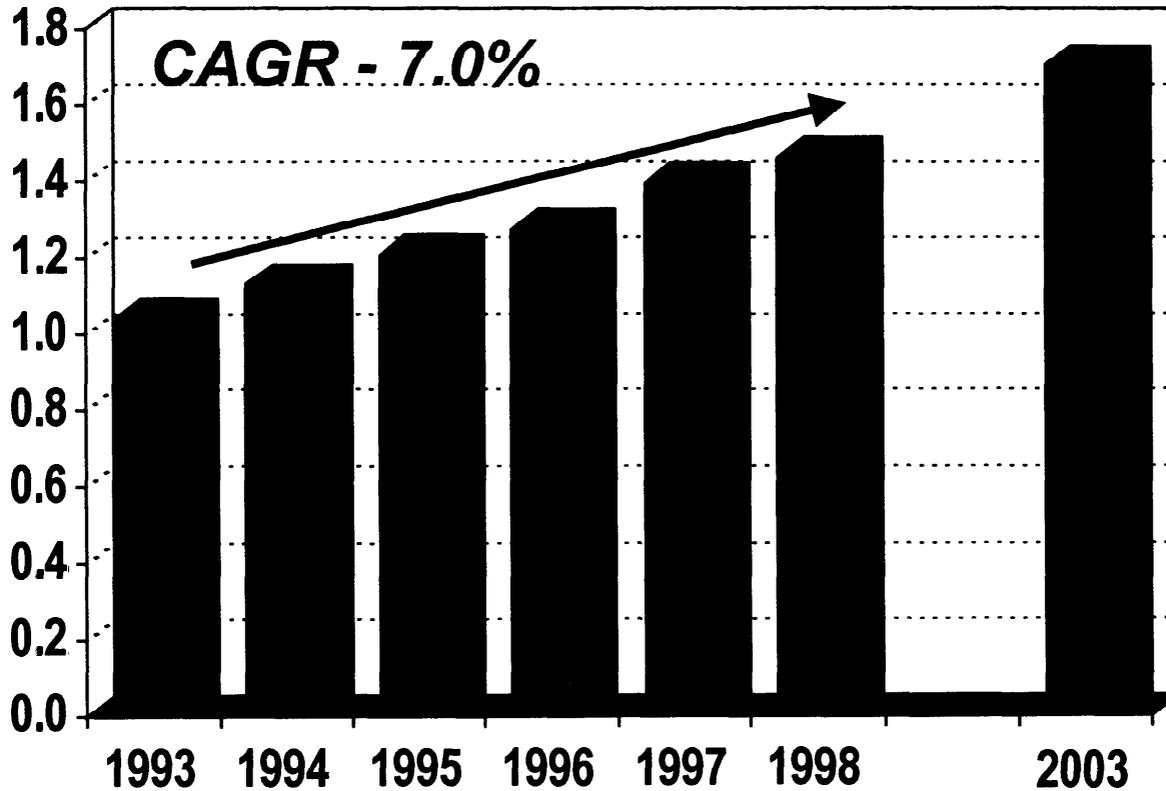
Las Vegas Key Demographic *Statistics*

Category	CAGR '98-'03	
	LAS	US AVG
Population	3.1%	0.9%
Total Retail Sales	7.3%	4.5%
Effective Buying Income	7.2%	4.5%
Average Household EBI	3.7%	3.4%
Per Capita EBI	3.9%	3.6%



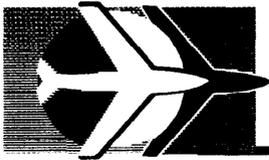
Las Vegas Population Growth

Millions



Population Forecast for 2003: 1,702,400
Projected CAGR 1998-2003: 3.1%

Note: CAGR - Compound Annual Growth Rate
Source: Demographics USA 1999 - County Edition



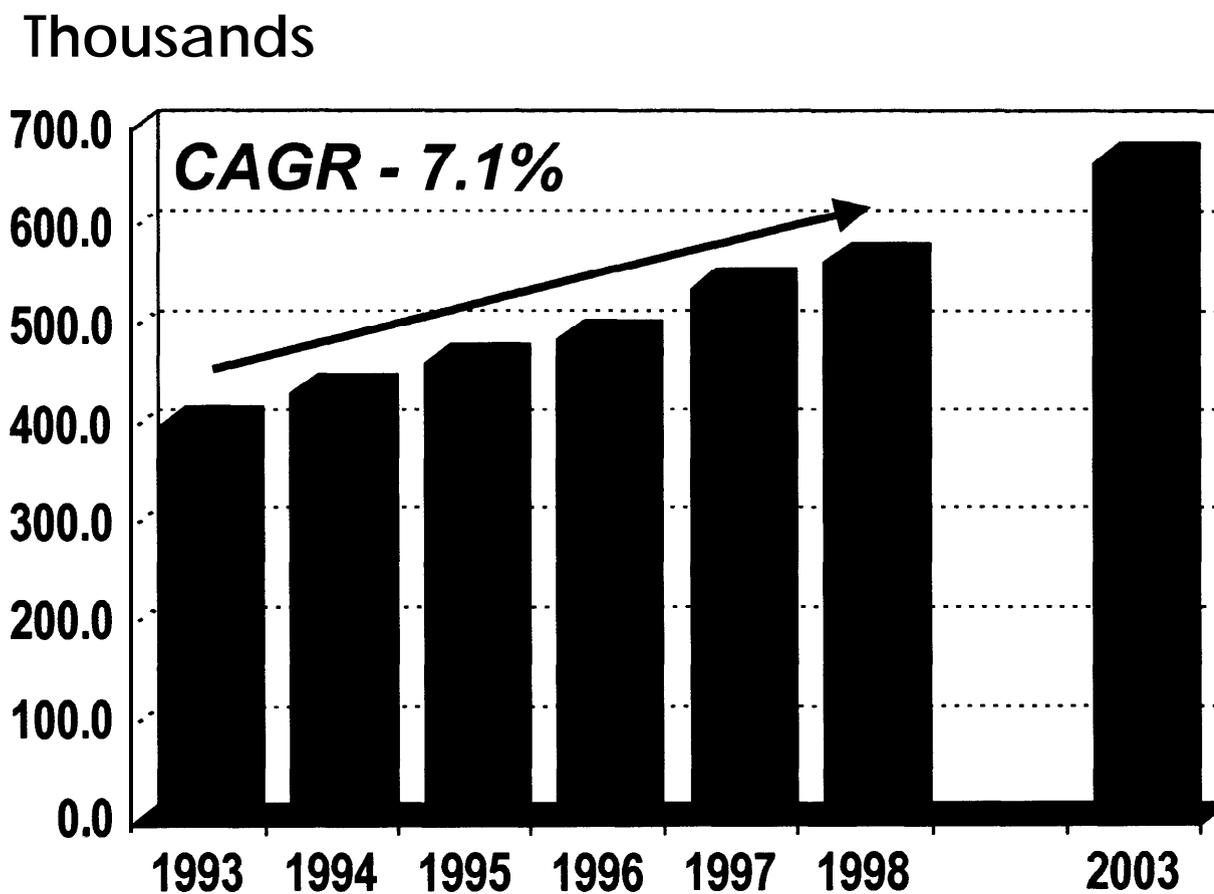
Comparative *Population* And *Growth Rates* Between Applicant *Cities*

Applicant	1998 Population (000s)	'93 - '98 CAGR	'98 - '03 CAGR
<i>Las Vegas</i>	<i>1,458.9</i>	<i>7.0%</i>	<i>3.1%</i>
Phoenix	3,007.8	4.2%	2.6%
Denver	1,978.4	2.1%	1.6%
Salt Lake City	1,265.1	1.6%	1.3%
Seattle	2,348.1	1.5%	1.3%
San Francisco	1,782.7	1.4%	1.1%
Los Angeles	9,735.8	1.2%	0.7%

Note: CAGR - Compound Annual Growth Rate
Source: Demographics USA 1999 - County Edition

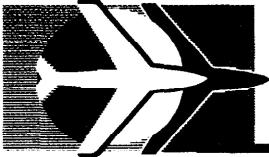


Las Vegas Household *Growth*



Household Forecast for 2003:
Projected CAGR 1998-2003:

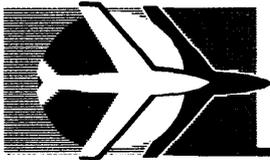
667,000
3.3%



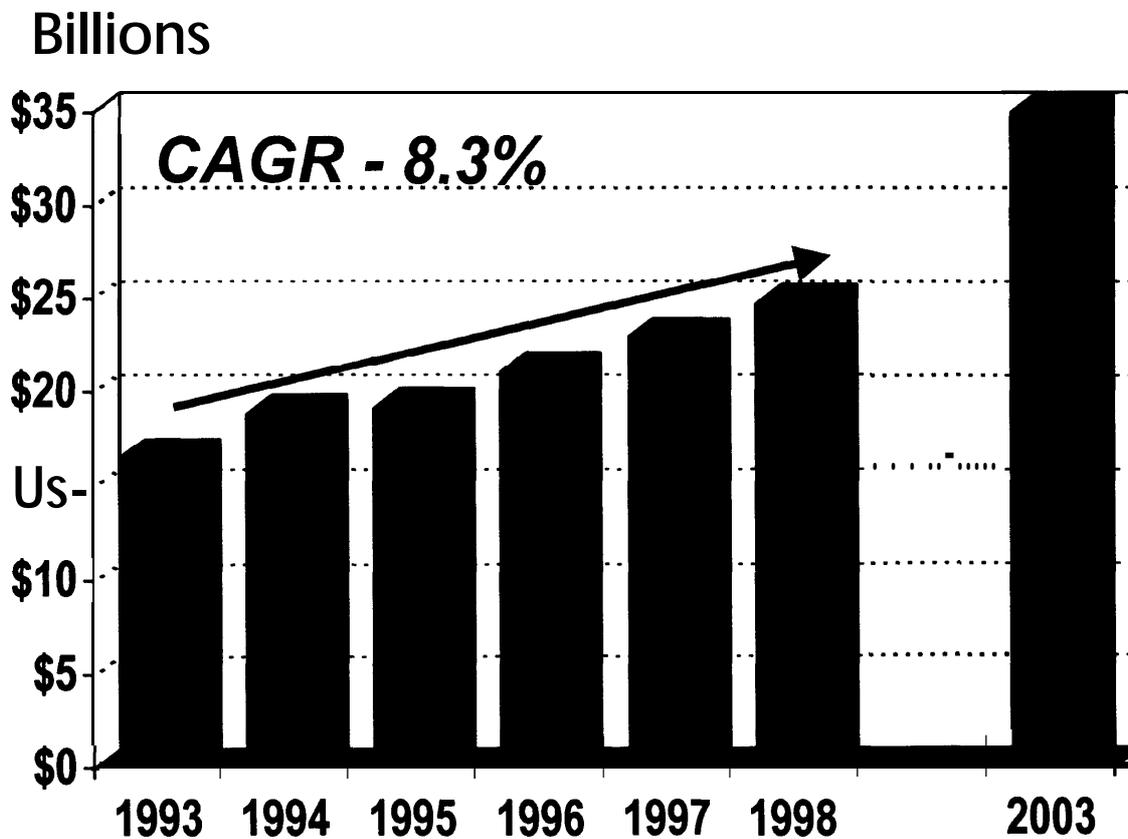
Comparative Households And Growth Rates Between Applicant Cities

Applicant	1998 Households (000s)	'93 - '98 CAGR	'98 - '03 CAGR
<i>Las Vegas</i>	566.8	7.1%	3.3%
Phoenix	1,148.3	4.3%	3.0%
Denver	799.3	2.1%	1.9%
Salt Lake City	419.1	2.1%	1.8%
Seattle	935.7	1.5%	1.5%
San Francisco	699.3	1.3%	0.9%
Los Angeles	3,194.8	1.0%	0.6%

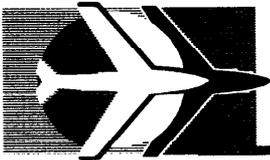
Note: CAGR - Compound Annual Growth Rate
Source: Demographics USA 1999 - County Edition



Las Vegas Effective Buying Income (*EBI*) Growth

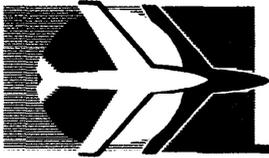


EBI Forecast for 2003 (bn):	\$35.0
Projected CAGR 1998-2003:	7.2%

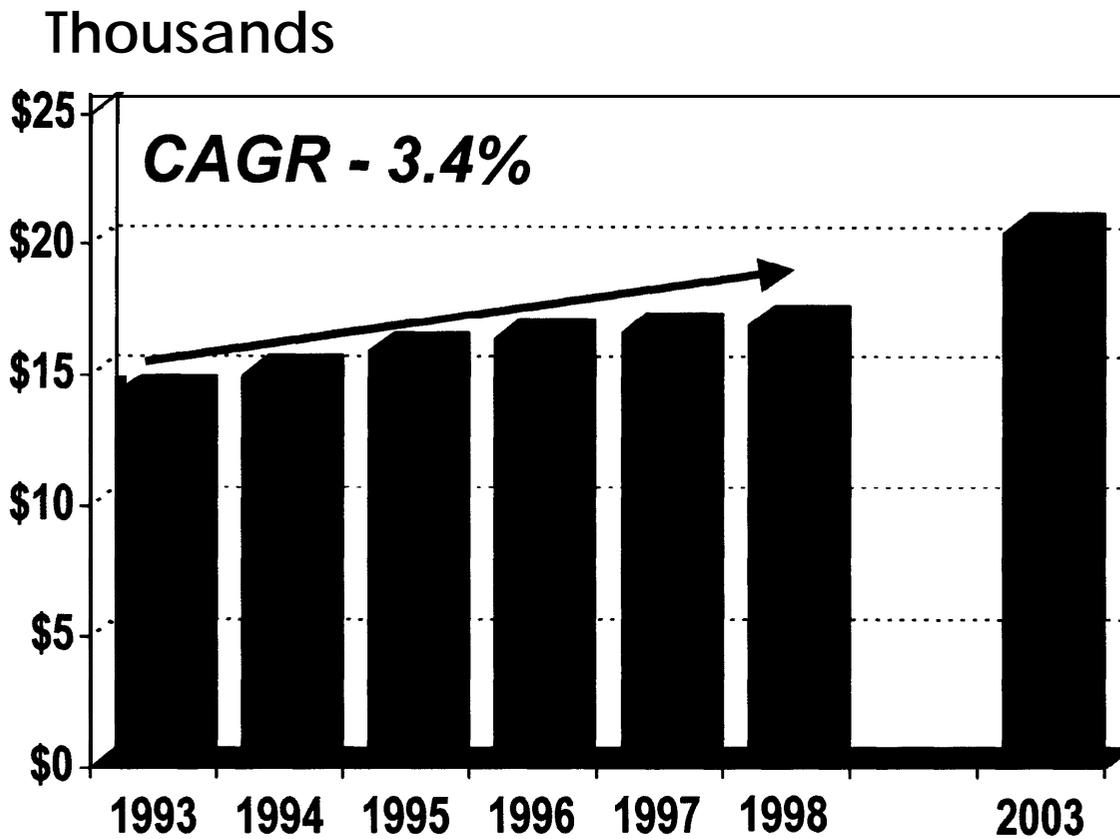


Comparative *EBI* And Growth Rates Between Applicant Cities

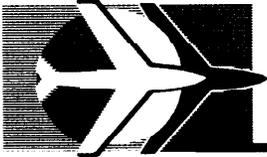
Applicant	1998 EBI (\$000s)	'93 - '98 CAGR	'98 - '03 CAGR
<i>Las Vegas</i>	24,740,539	8.3%	7.2%
Seattle	55,638,076	4.7%	7.2%
Salt Lake City	19,199,330	6.8%	6.1%
Phoenix	47,740,801	8.9%	6.0%
Denver	38,460,249	3.9%	5.2%
San Francisco	42,749,077	4.0%	4.3%
Los Angeles	147,629,445	4.4%	2.0%



Las Vegas Per Capita *EBI*

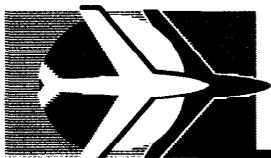


Per Capita EBI Forecast for 2003: \$20,560
Projected CAGR 1998-2003: 3.9%

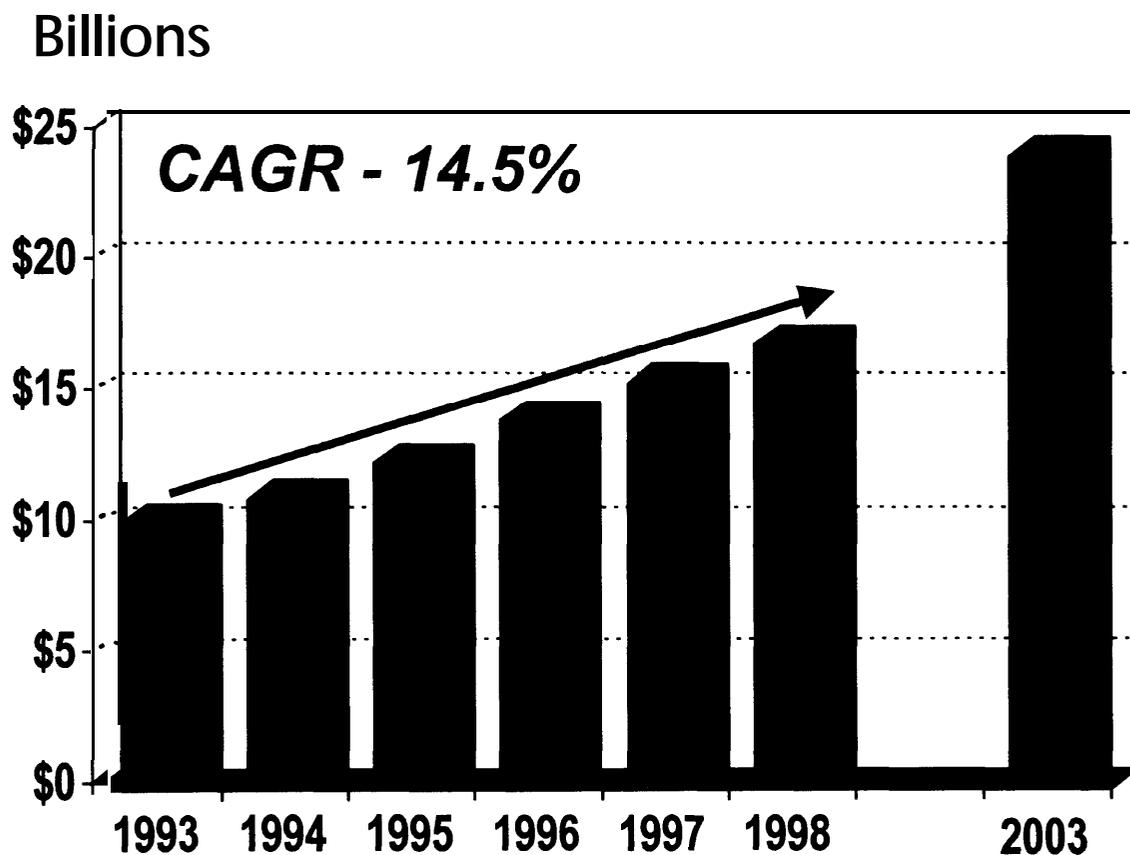


Comparative Per Capita *EBI* And Growth Rates Between Applicant Cities

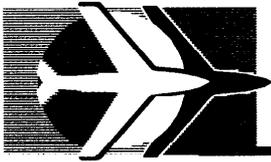
Applicant	1998 EBI Per Capita (\$000s)	'93 - '98 CAGR	'98 - '03 CAGR
<i>Las Vegas</i>	16,958	4.8%	3.9%
Phoenix	15,872	4.5%	3.1%
Salt Lake City	15,176	5.6%	4.8%
Denver	19,440	4.5%	3.5%
San Francisco	23,980	5.3%	3.2%
Los Angeles	15,164	2.1%	1.3%
Seattle	23,695	6.7%	5.8%



Las Vegas Retail Sales Growth



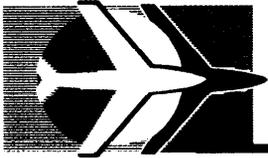
Retail Sales Forecast for 2003 (bn): **\$23.9**
Projected CAGR 1998-2003: **7.3%**



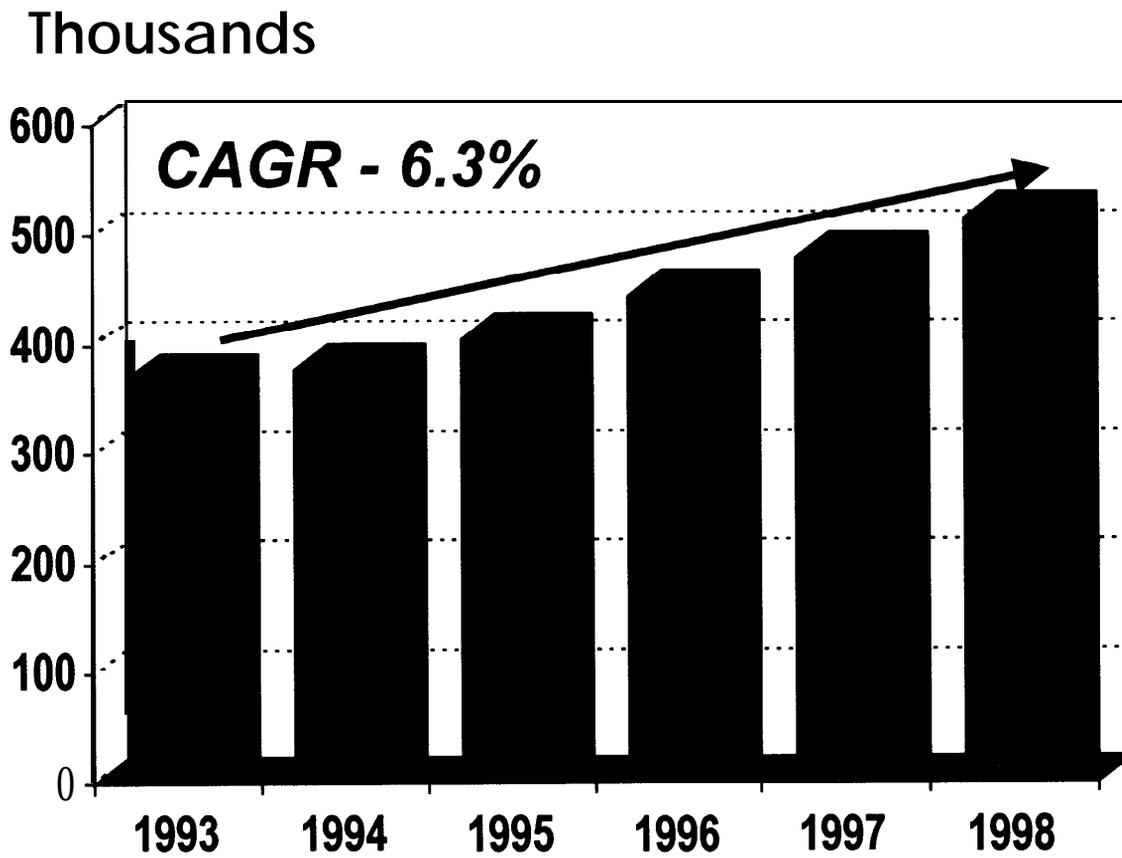
Comparative *Retail* Sales And Growth Rates Between Applicant Cities

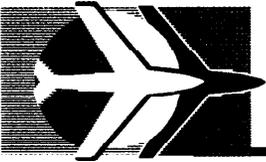
Applicant	1998 Retail Sales (\$000s)	'93 - '98 CAGR	'98 - '03 CAGR
<i>Las Vegas</i>	16,832.7	14.5%	7.3%
Phoenix	32,856.3	8.3%	6.9%
Seattle	26,329.5	5.7%	4.6%
Salt Lake City	12,313.6	5.5%	5.4%
Denver	21,863.0	4.4%	5.0%
San Francisco	19,658.0	3.6%	3.2%
Los Angeles	69,808.7	0.9%	1.2%

Note: CAGR - Compound Annual Growth Rate
Source: Demographics USA 1999 - County Edition



Las Vegas Employment Growth

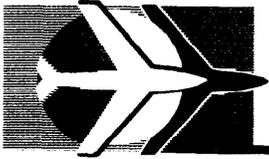




Comparative Employment And Growth Rates Between Applicant Cities

Applicant	1998 Employment	'93 - '98 CAGR
<i>Las Vegas</i>	514,860	6.3%
Phoenix	1,103,918	5.6%
Salt Lake City	524,565	5.5%
Denver	846,965	3.3%
Seattle	906,796	2.1%
San Francisco	847,876	-0.6%
Los Angeles	3,370,862	-1.2%

Note: CAGR - Compound Annual Growth Rate
Source: Demographics USA 1999 - County Edition

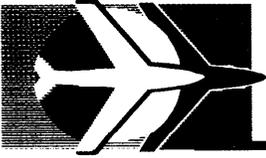


Las Vegas Named "Most Livable Big City In America" By Federal Reserve Bank Study

<u>1999 Rank</u>	<u>City</u>
1	LAS VEGAS
16	Phoenix
20	Denver
22	Salt Lake City
38	Seattle
39	San Francisco
	Los Angeles

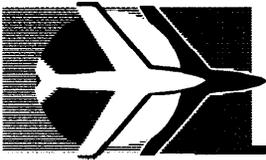
"Most Livable Big City in America"

Note: Based on 1990-1997 migration data
Source: Federal Reserve Bank of St. Louis; Wall Street Journal 6/23/99



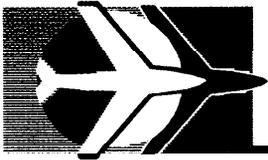
Las Vegas: Growing . . . and . . . Growing . . . and . . . Growing

Category	7 999 Amount	Increase vs. 7998
Visitors	33.8	10.5%
Hotel / motel occupancy	88.0%	2.2 points
Convention attendees	3.8 million	14.3%
Hotel / motel rooms	120,294	10.0%



Las Vegas Ranks First In U.S. Population & Household Growth

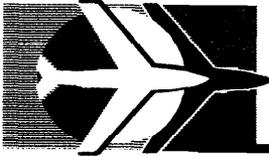
	% Change	U.S. Rank
TOTAL POPULATION^{1/}		
10 years	77.3%	1
1 year	4.7%	1
HOUSEHOLDS^{1/}		
10 years	79.1%	1
1 year	5.5%	1



Las Vegas: Not *Just* A Place To Play

SINCE 1990:

Category	U.S. Rank
Employment Growth	1
High-Tech Job Growth	1



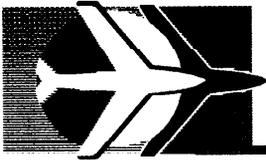
Nevada Means Business

	% Change vs. Previous Year	U.S. Rank
Gross State Product^{1/}	7.4%	2
New Business Incorporations^{2/} (# of Firms)	16.7%	2

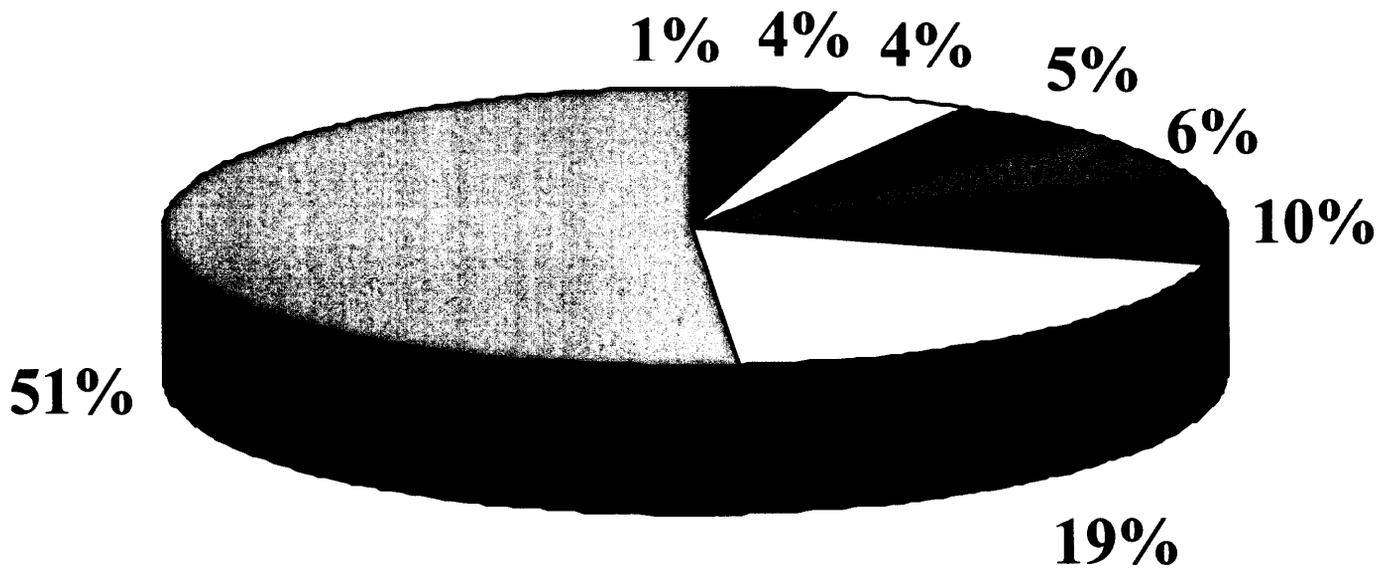
^{1/} Bureau of Economic Analysis data (1997)

^{2/} Dun & Bradstreet data (1998)

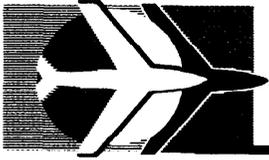
Source: Dismal Sciences, Inc.



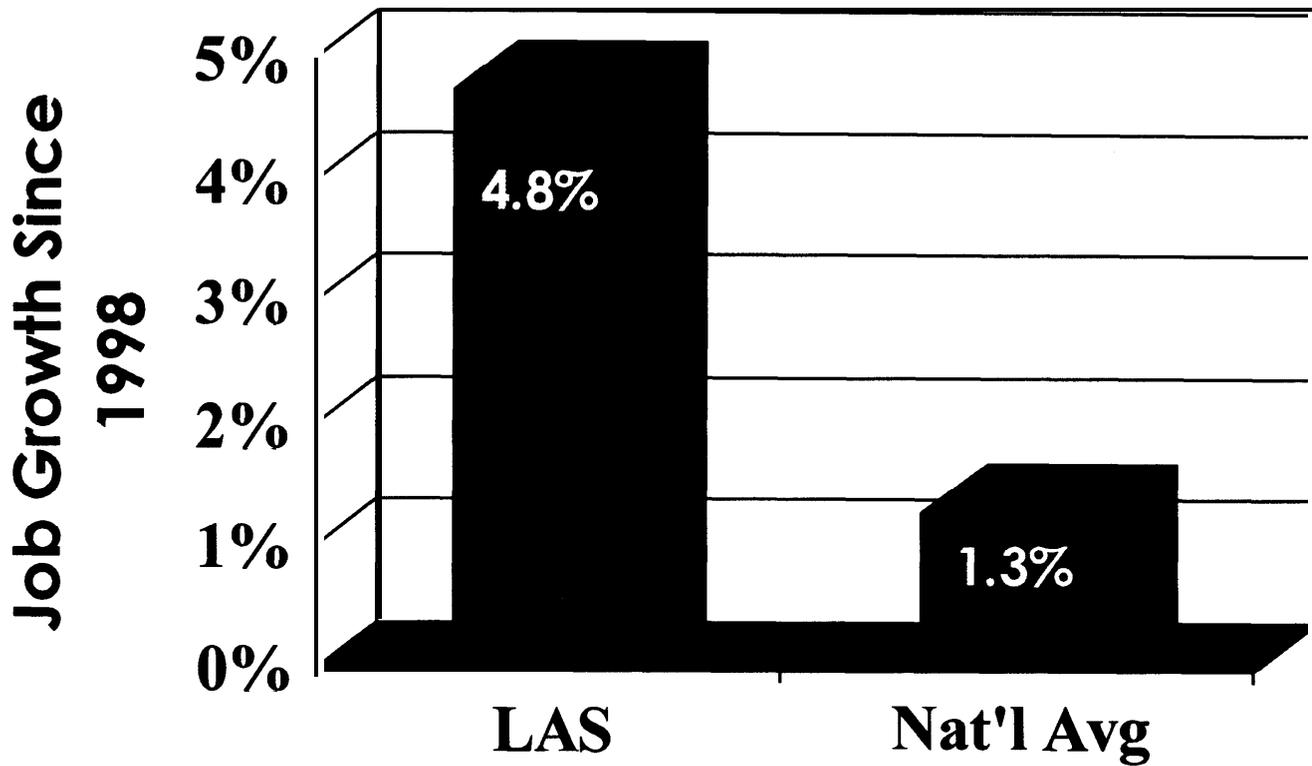
Las Vegas Employment



Sector	Employees (000)
Service	264.4
Retail Trade	99.1
Construction	52.6
Finance, Insurance, & Real Estate	30.2
Transportation & Public Utilities	24.0
Manufacturing	20.5
Wholesale Trade	18.3
Agricultural Services & Mining	5.8
TOTAL	514.9

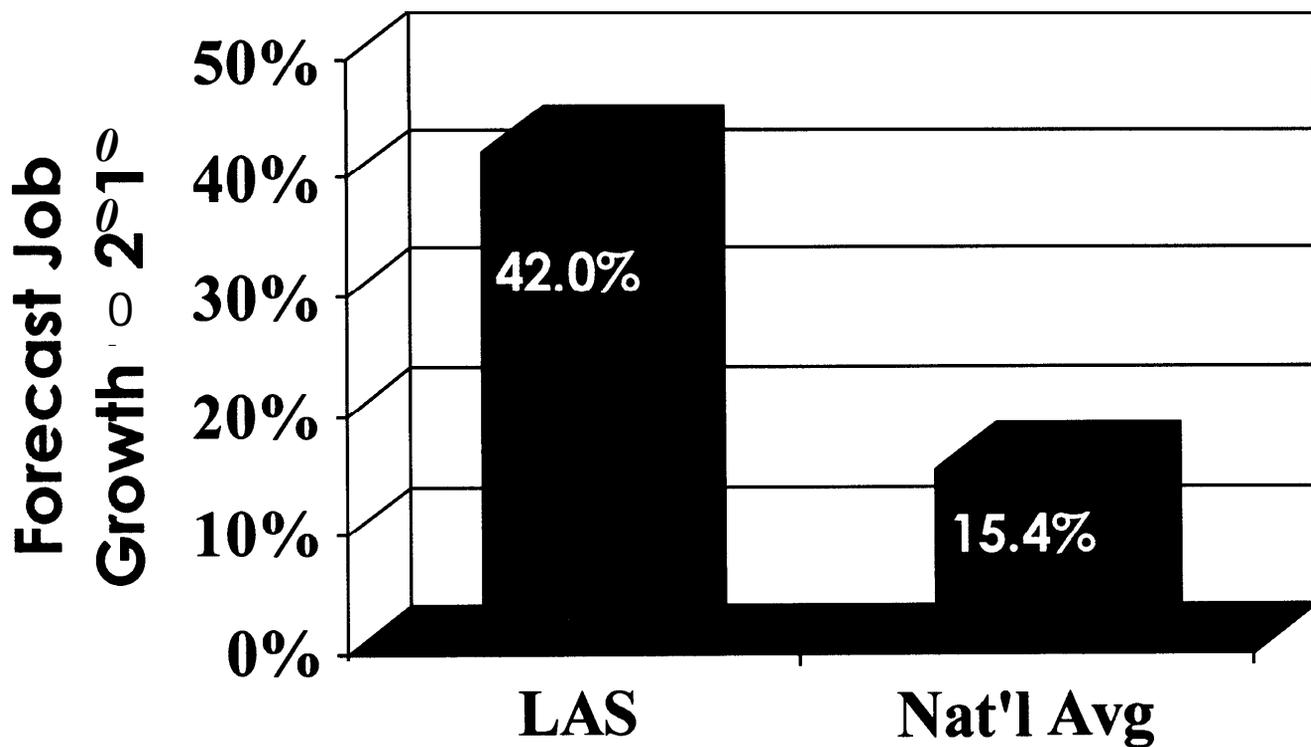


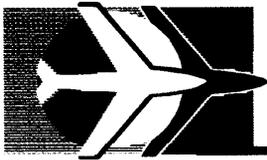
Las Vegas Job Growth





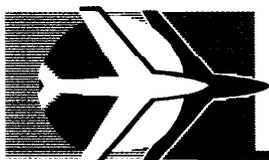
Las Vegas Projected Job Growth





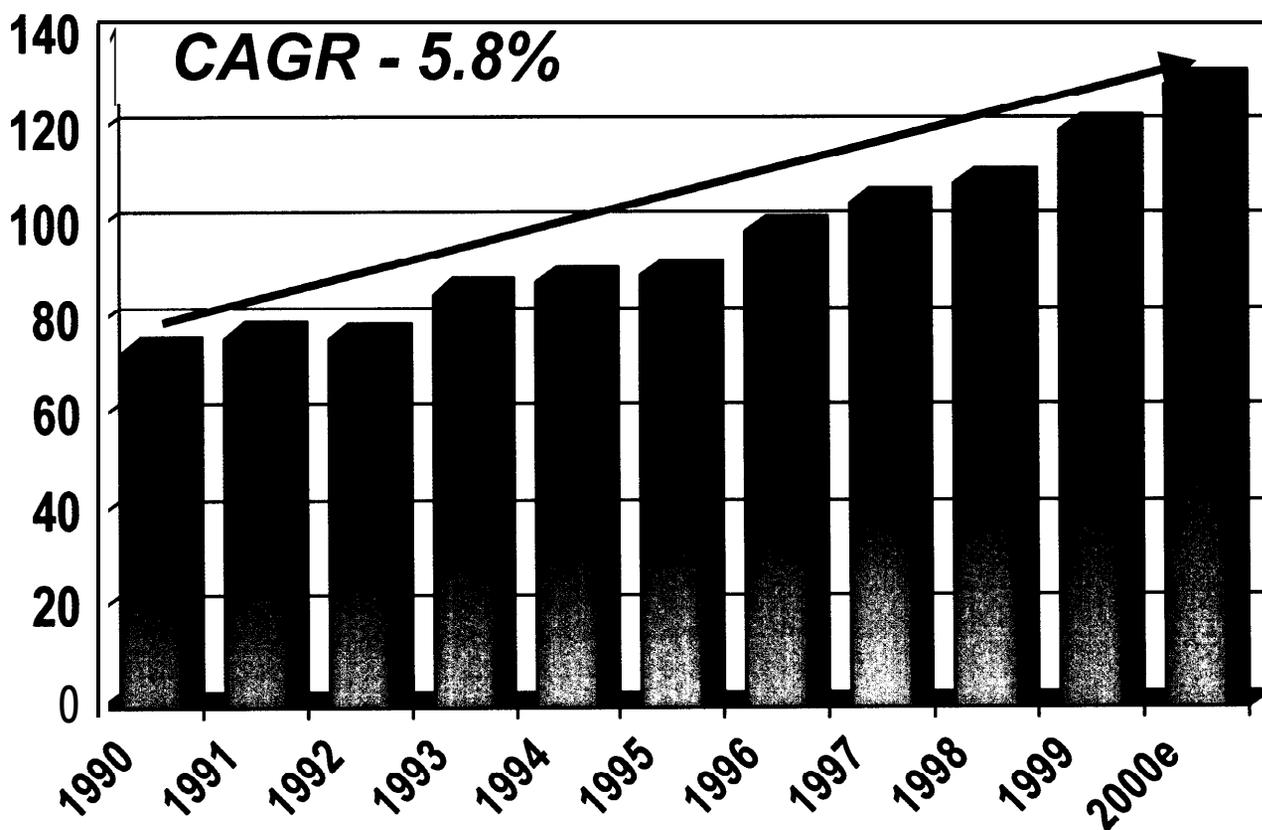
Comparative Job Growth Between Applicant Cities

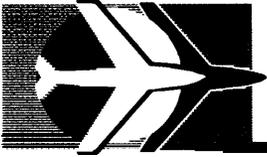
Applicant	Job Growth Since 1998	Forecast Job Growth to 2010
<i>Las Vegas</i>	4.76%	42.00%
Salt Lake City	1.05%	28.48%
Phoenix	5.52%	28.36%
Denver	3.73%	22.79%
San Francisco	2.31%	9.98%
Los Angeles	3.75%	6.18%
Seattle	3.19%	20.06%



Las Vegas Hotel Room Growth

Thousands

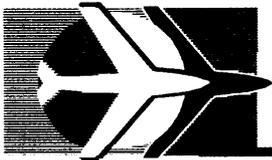




Las Vegas Continues To See *Hotel* Room Expansion

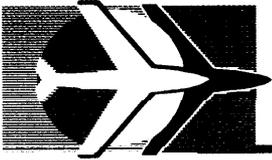
- Over 10,500 rooms opened in 1999
- 5,500 new rooms are planned in next 2 years:
 - **4,230 new rooms will open in 2000**
 - **1,338 new rooms planned to open in 2001**
- Several new “mega-resorts” opening:
 - **Marriott Marquis (1st Quarter 2000)**
 - **Aladdin (1st Half 2000)**





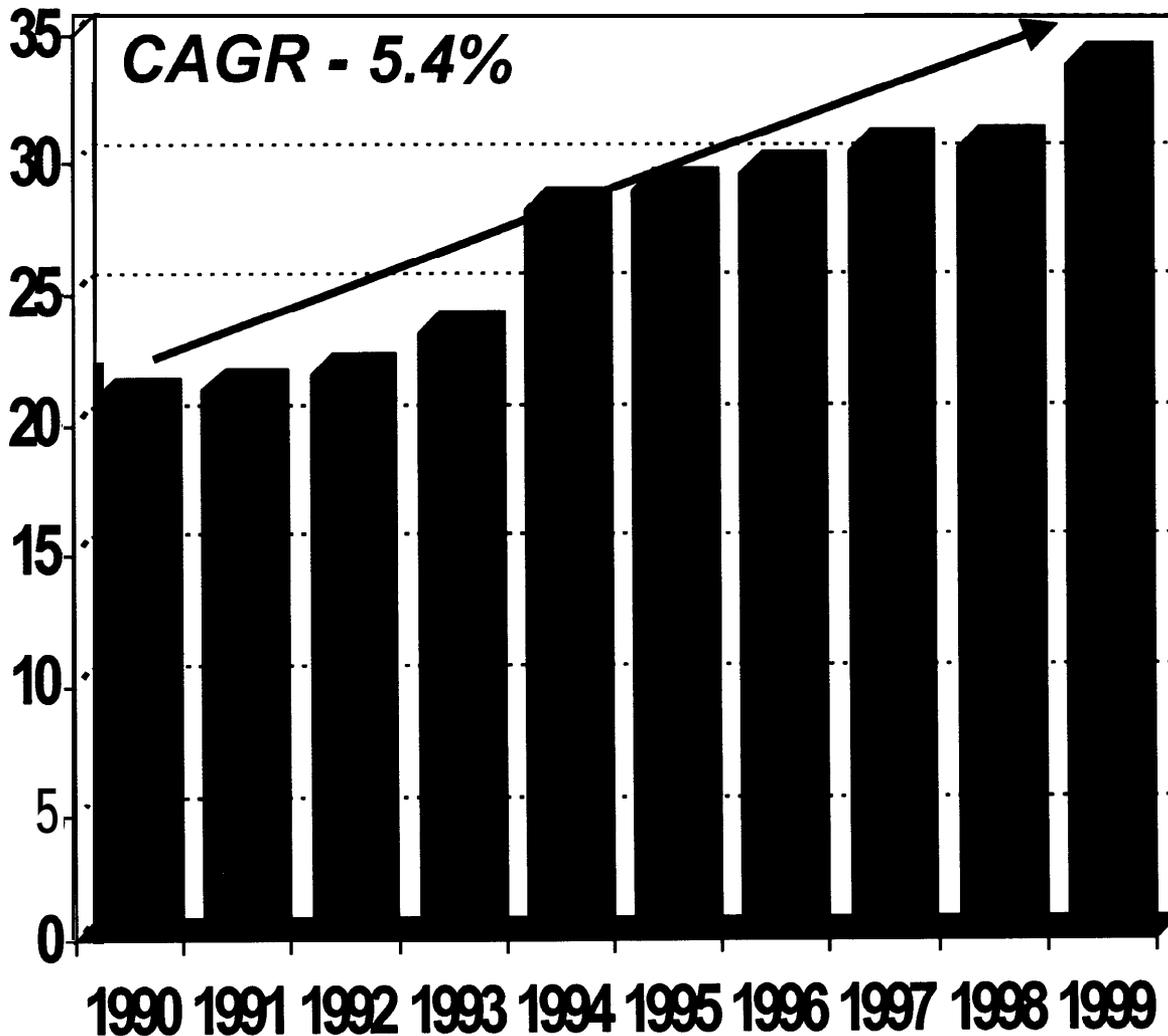
77 Conventions With 10,000 Or More Attendees In 2000

NOV	Comdex Fall / ZD Events Inc.	225,000
APR	National Association of Broadcasters	115,000
AUG	MAGIC Intl	90,000
MAY	Networld+Interop Las Vegas	75,000
AUG	Association of Surplus Dealers	51,000
OCT	National Mining Assn	40,000
SEP	PGA Intl Golf Show	33,000
JUN	Intl Trucking Show	32,000
AUG	Western Shoe Association	30,000
OCT	World Gaming Congress & Expo	23,000
DEC	American Society of Health System Pharmacists	16,000
JUN	Soc For Human Resource Management	15,000
JUL	Avon Products	14,000
JUN	Bass Hotels and Resorts	13,000
MAY	Electronic Distribution Show	10,000
JUN	International Carwash Assn	10,000
JUL	Video Software Dealers Assn	10,000

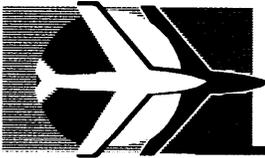


Las Vegas Visitor Growth

Millions

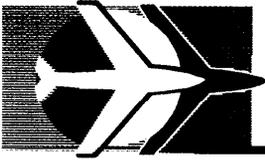


CAGR - Compound Annual Growth Rate
Source: Las Vegas Convention & Visitors Authority

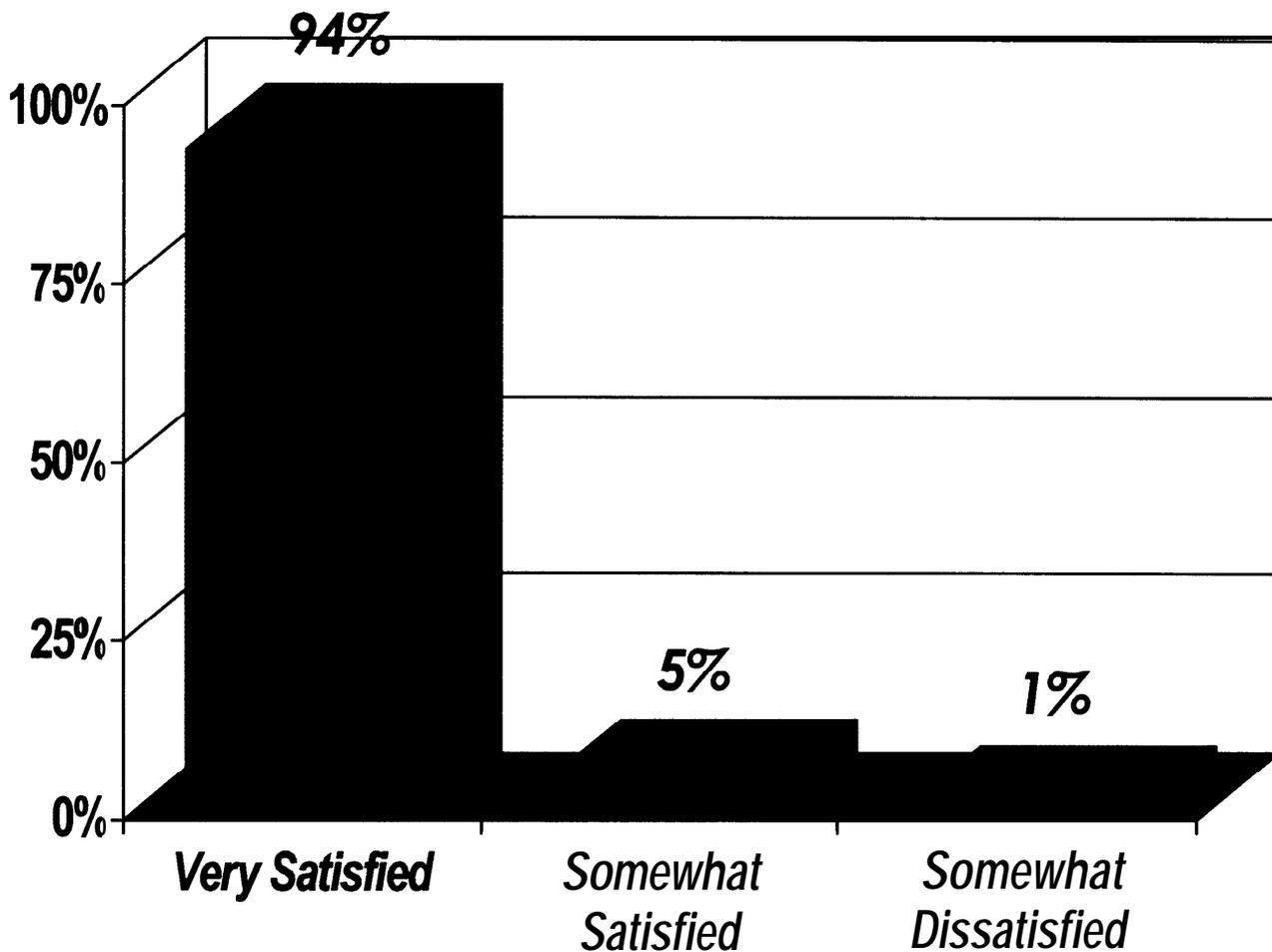


Summary Table Of *Notable* Visitor Demographics

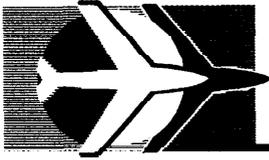
<i>Proportion of respondents who were 40 years old or older</i>	68%
<i>Average age</i>	48.3
<i>Proportion of respondents who were married</i>	70%
<i>Proportion of respondents with a household income of \$40,000 or more</i>	57%
<i>Proportion of respondents who were retired</i>	26%
<i>Proportion of respondents from California</i>	32%
<i>Proportion of respondents from a foreign country</i>	13%



Las Vegas = Visitor *Satisfaction*



Source: GLS Research, 1997 Las Vegas Visitor Profile Study



Las Vegas Is Served By 18 Domestic Scheduled Airlines

American

Alaska

Allegiant Air

American Trans Air

America West

Continental

Delta

Frontier

Hawaiian

Legend

National

Northwest

Scenic

Southwest

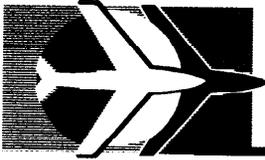
Sun Country

Sunrise Airlines

TWA

United

US Airways



Las Vegas Is Served By 7 International Airlines

AeroMexico

Air Canada

Aviacsa

Canada 3000

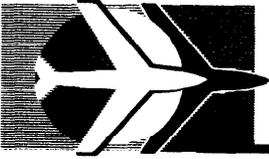
Condor Flugdienst

Japan Airlines

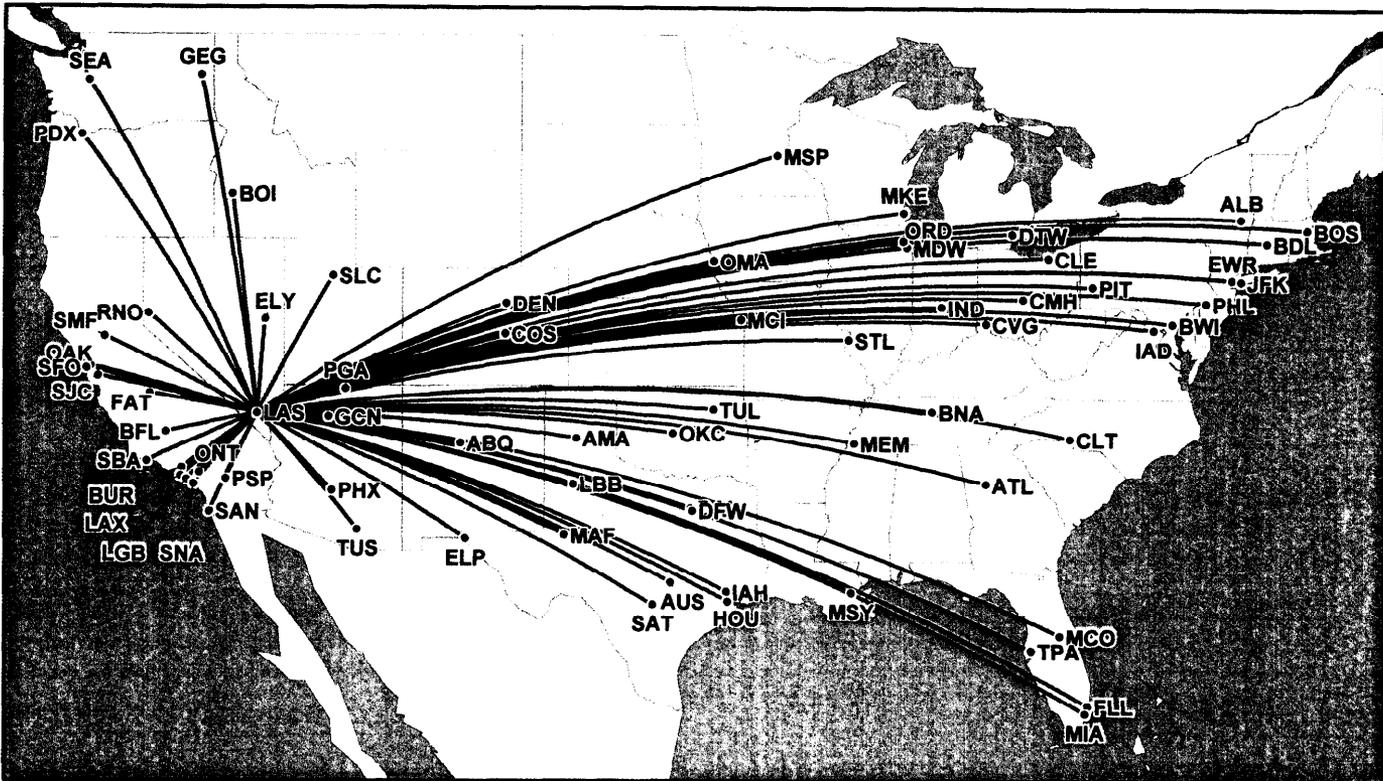
Virgin Atlantic

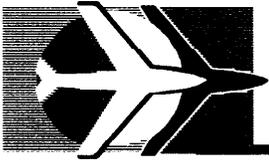
Note: **AeroMexico** service will begin June 15, 2000;
Virgin Atlantic service will begin June 8, 2000.

Source: May 2000 OAG

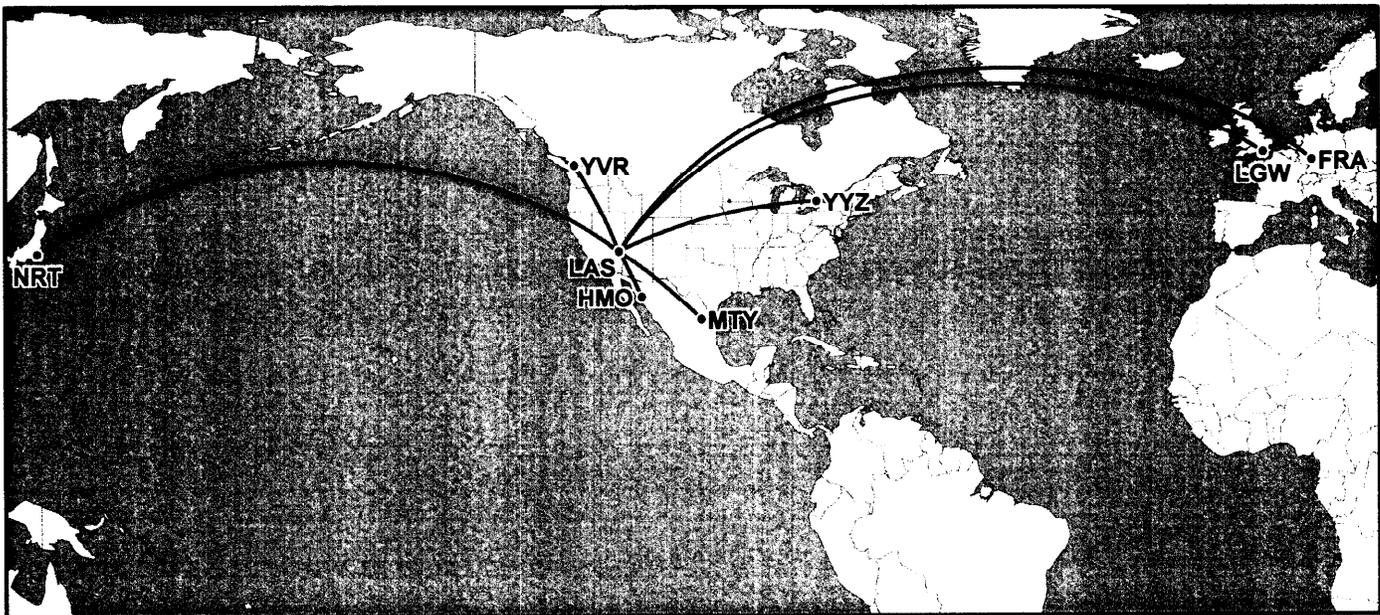


Las Vegas Offers Service To 70 Nonstop Domestic Destinations



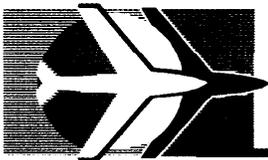


Las Vegas Offers Service To 7 *Nonstop* foreign *Destinations*

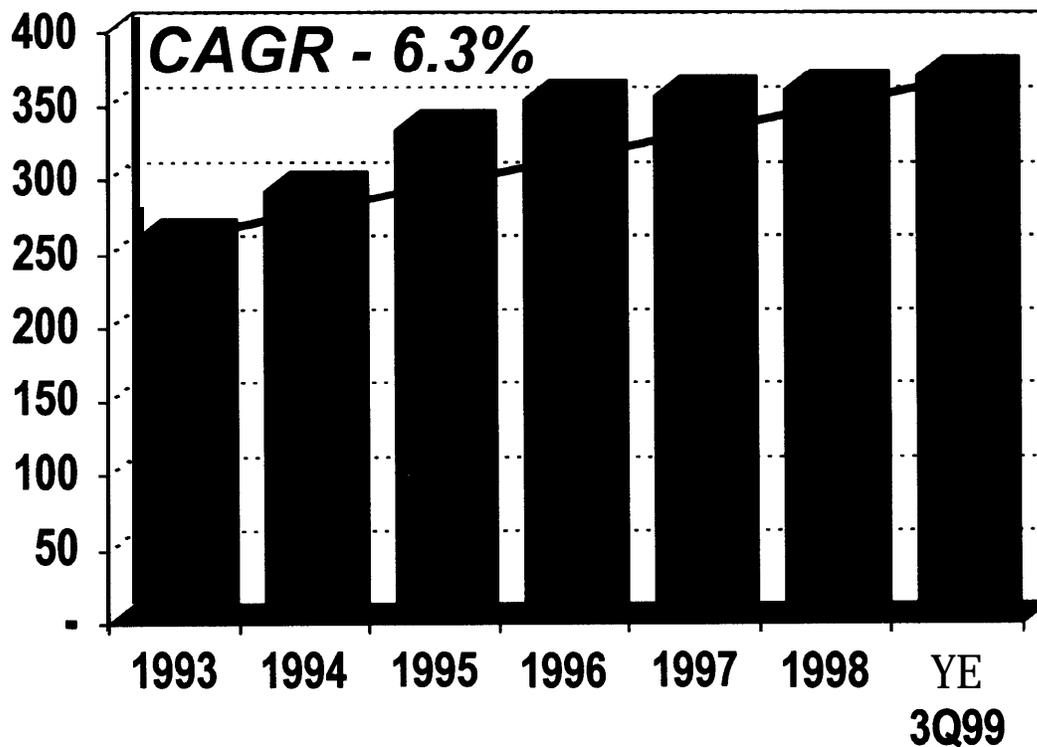


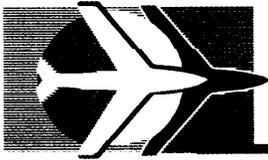
Note: Virgin Atlantic (LGW) and AeroMexico (HMO) are scheduled to initiate service June 2000

Source: May 2000 OAG



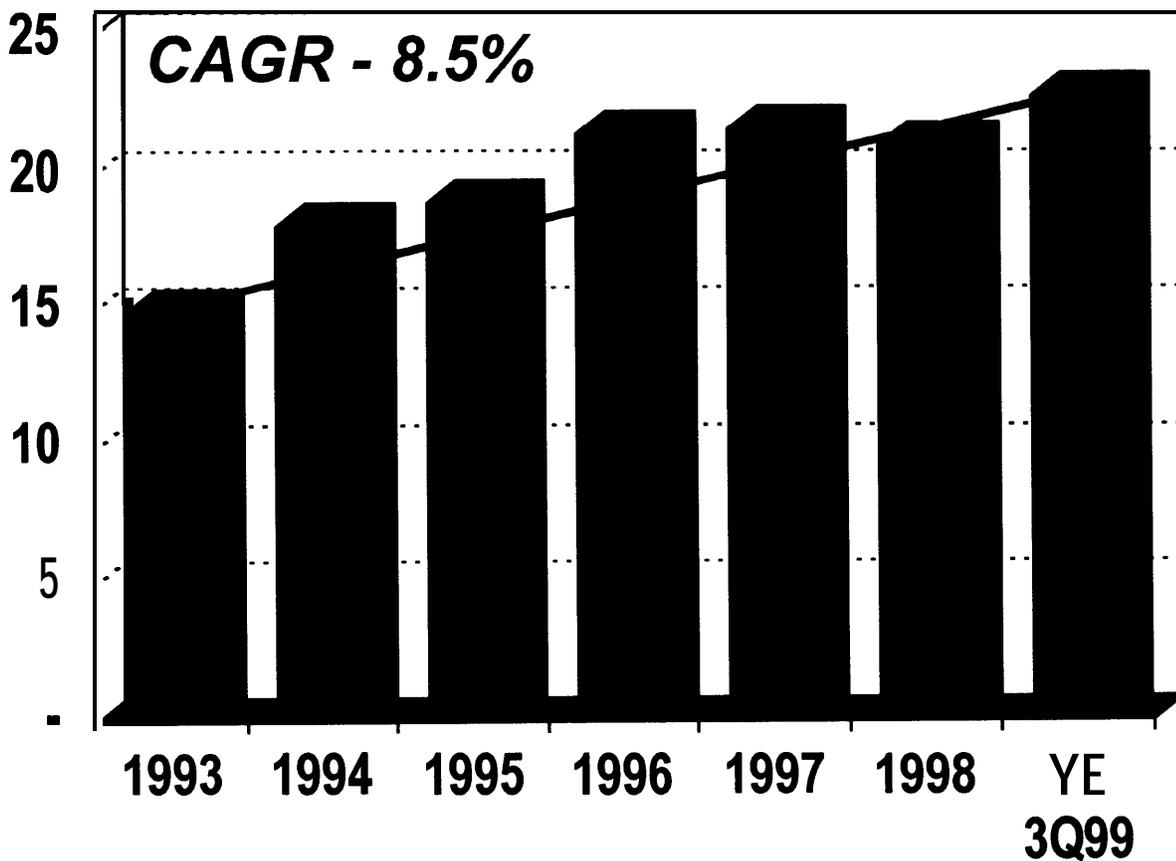
Las Vegas Has 371 Daily Domestic Departures

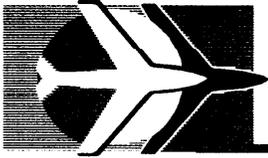




Las Vegas Total Domestic Passengers And Growth Rates

Millions



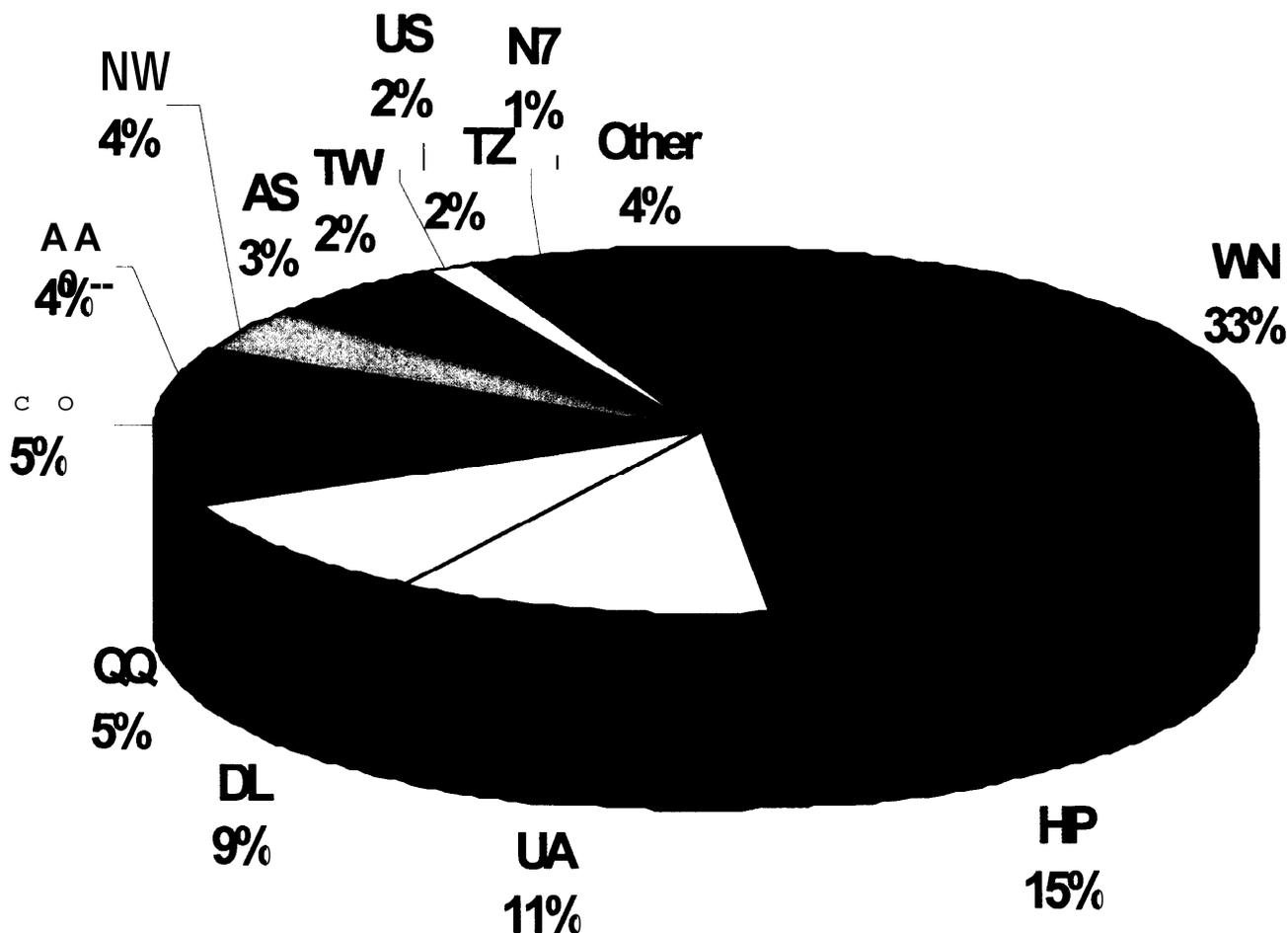


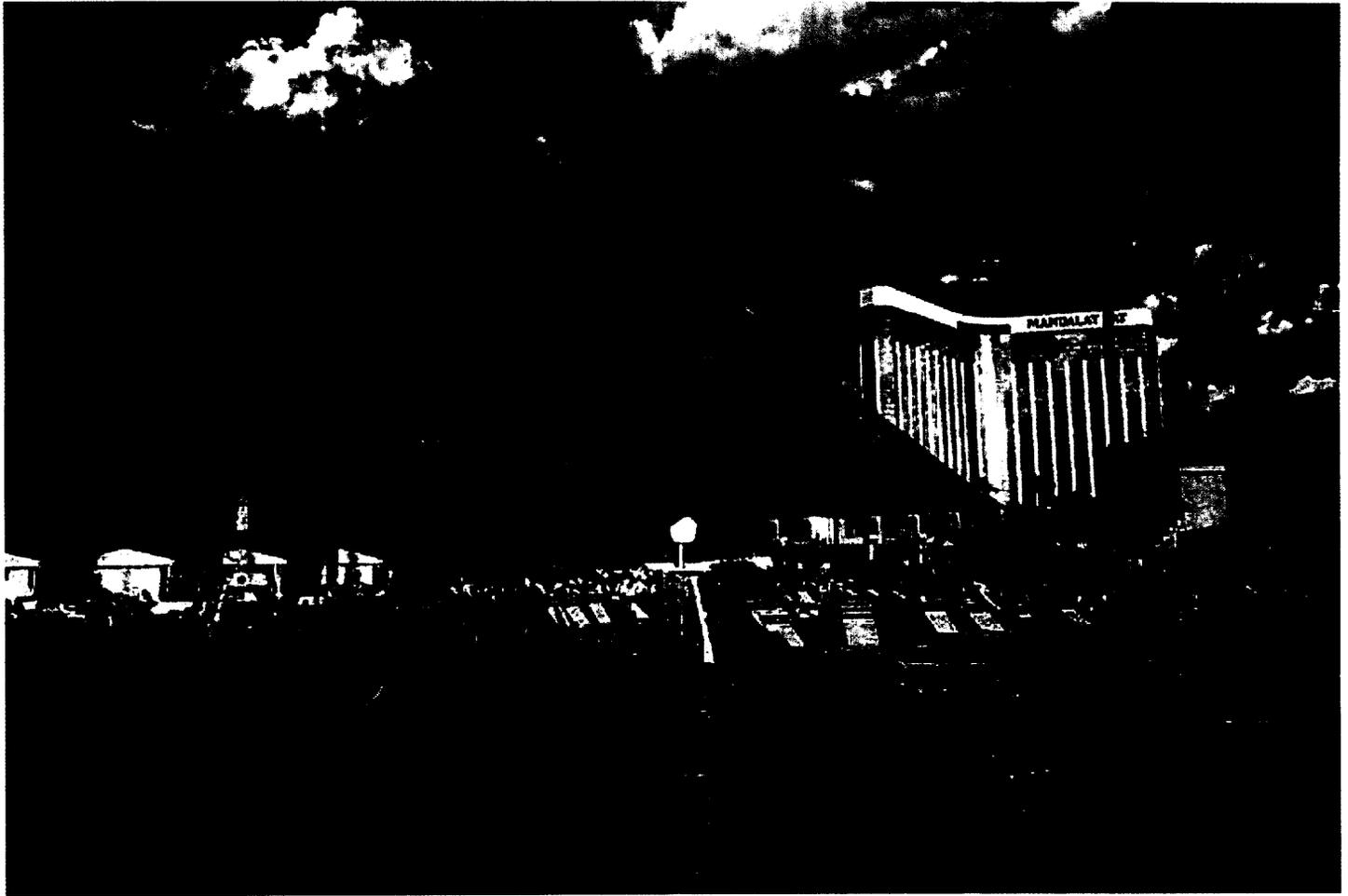
Las Vegas Is The *16th* Busiest Airport In The World

<u>Ranked by Passengers</u>	<u>Airport</u>
1	Atlanta
2	Chicago
3	Los Angeles
4	London (LHR)
5	Dallas / Ft. Worth
6	Tokyo (HND)
7	Frankfurt
8	Paris (CDG)
9	San Francisco
10	Denver
11	Amsterdam
12	Minneapolis
13	Detroit
14	Miami
15	Newark
16	<i>Las Vegas</i>
17	Phoenix
18	Seoul
19	Houston (IAH)
20	New York (JFK)



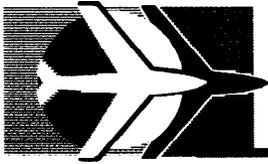
Las Vegas Total Passenger Market Share: YE 3Q99





Fun For The Entire Family

Series **200** Exhibits

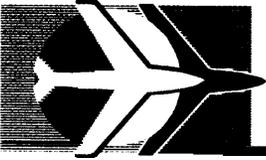


Introduction To Series 200 Exhibits

Between 1993 and year ended third quarter of 1999, local fares in the Washington-Las Vegas market have declined by an average of 1.1% per annum (Exhibit LAS-201). But during the same time frame, airfares in the LAS-DCA market have risen by 1.1% per annum reflecting the fact that there is no nonstop service in the market (Exhibit LAS-202). In addition, the annual growth rate in airfares during these same years in the LAS-DCA market has outstripped airfare growth rates in all other competitive city-pair markets participating in this proceeding.

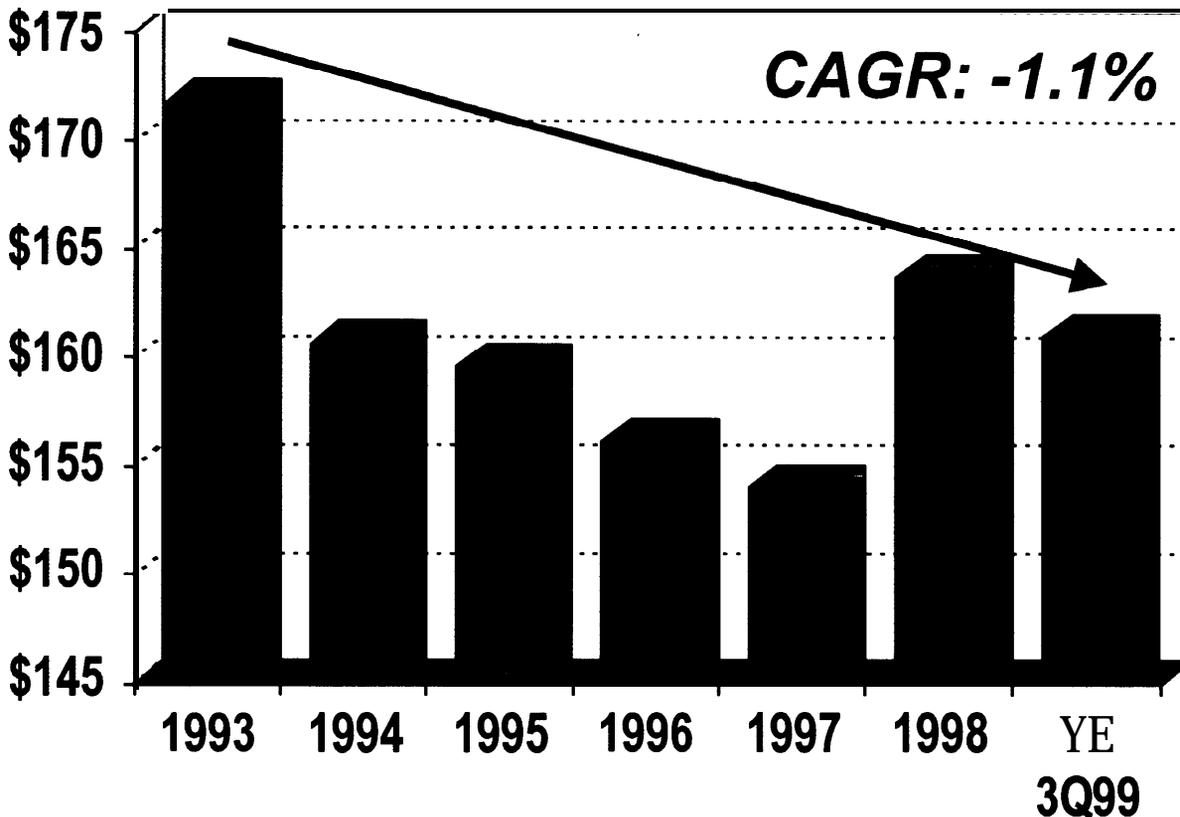
In a further demonstration of the need for new entrant low fare competition in the Las Vegas-DCA market, the average annual increase in airfares in the Las Vegas-DCA market can be contrasted to the average annual decline in air fares in the Denver and Salt Lake City markets of roughly 5% since 1993 (Exhibit LAS-203). This increase in air fares over the past five years between DCA and Las Vegas results in DCA-LAS average yields being the second highest (PHX is the highest) of all the applicant cities (Exhibit LAS-204), with DCA-LAS fares being the third highest among the seven cities, even higher than the fares from DCA to the coastal cities of Los Angeles and San Francisco (Exhibit LAS-205).

The west coast markets, on the other hand, have extremely low Origin & Destination fares to Las Vegas, thus permitting single interline connections beyond/behind Las Vegas for DCA passengers using new DCA-LAS service (Exhibit LAS-206).

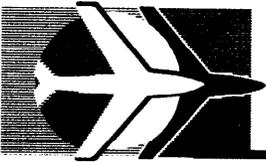


Las Vegas- Washington Area O&D Fares *Have Declined* . . .

Weighted Average Fare

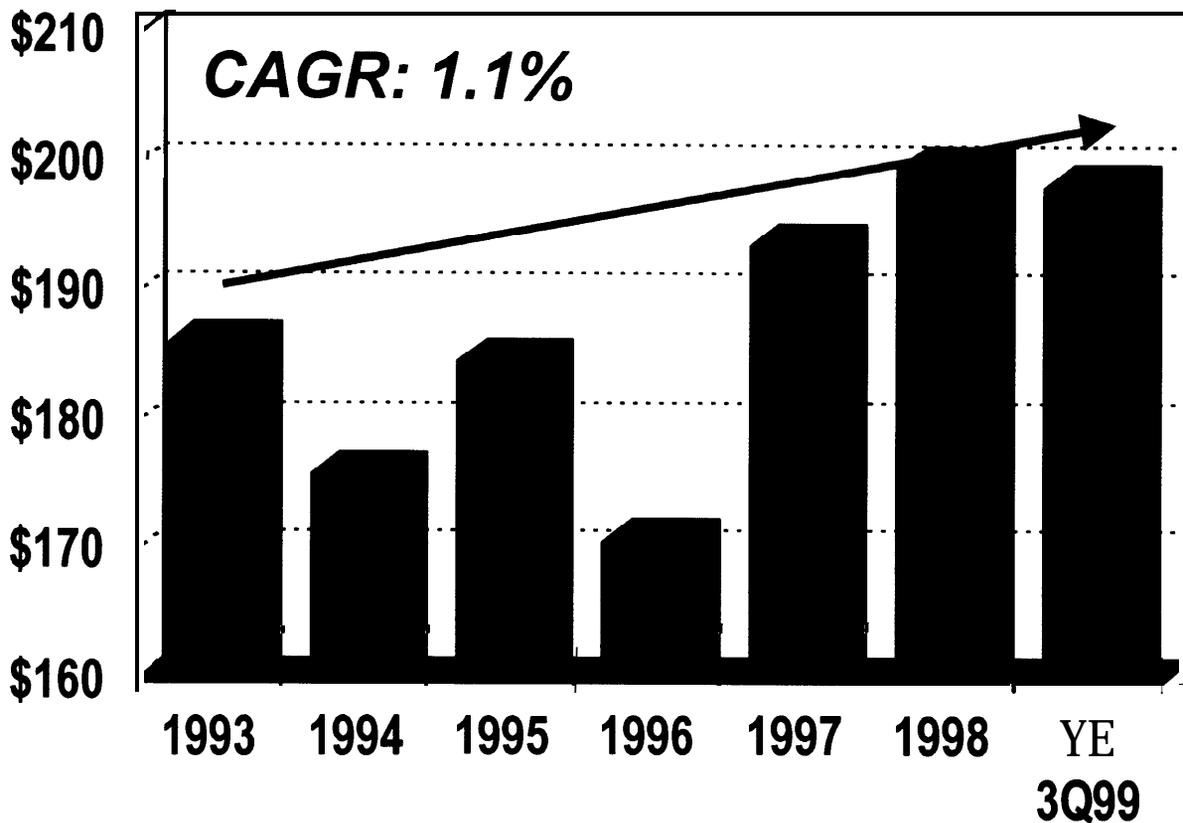


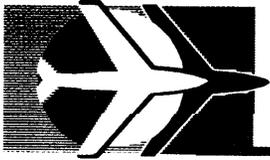
But ...



LAS-DCA O&D Fares Have Risen *Without* Nonstop Service

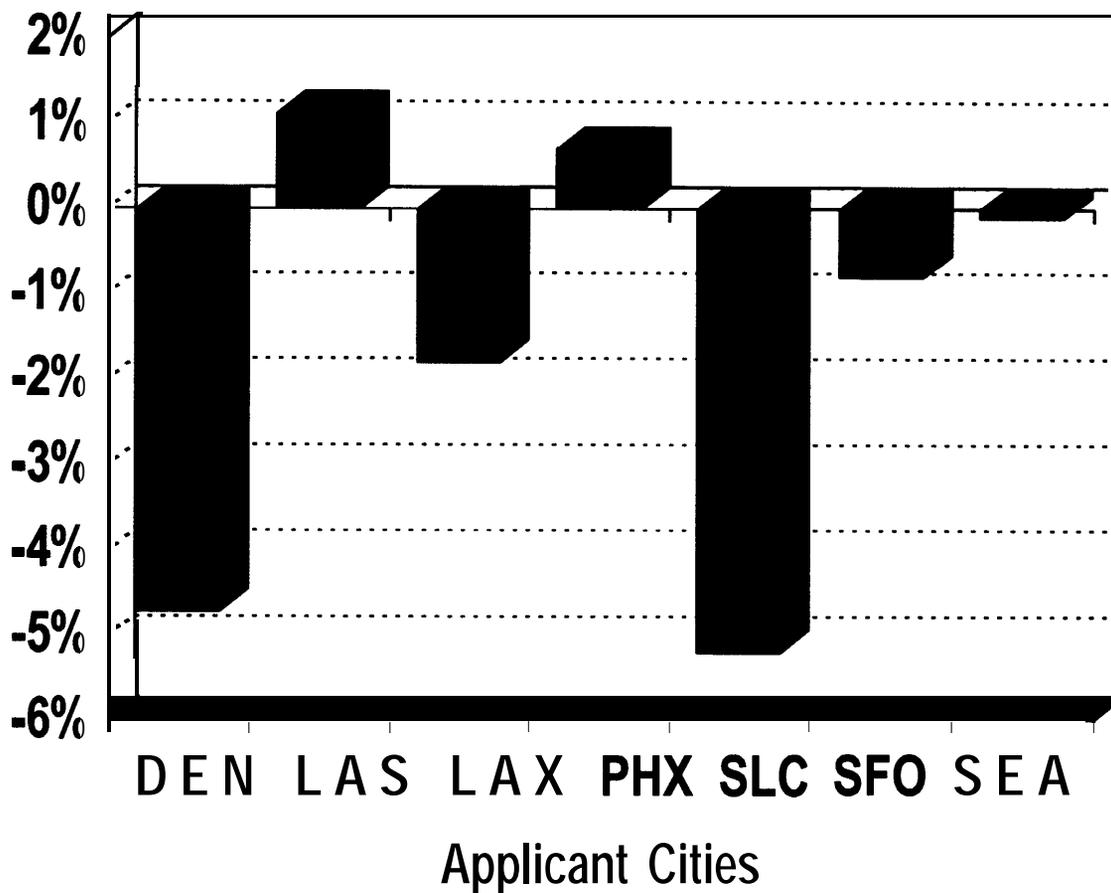
Weighted Average Fare

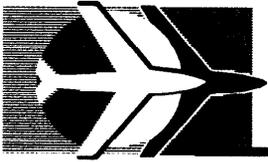




LAS-DCA O&D Fares Have Risen More *Than* Other Cities' Fares . . .

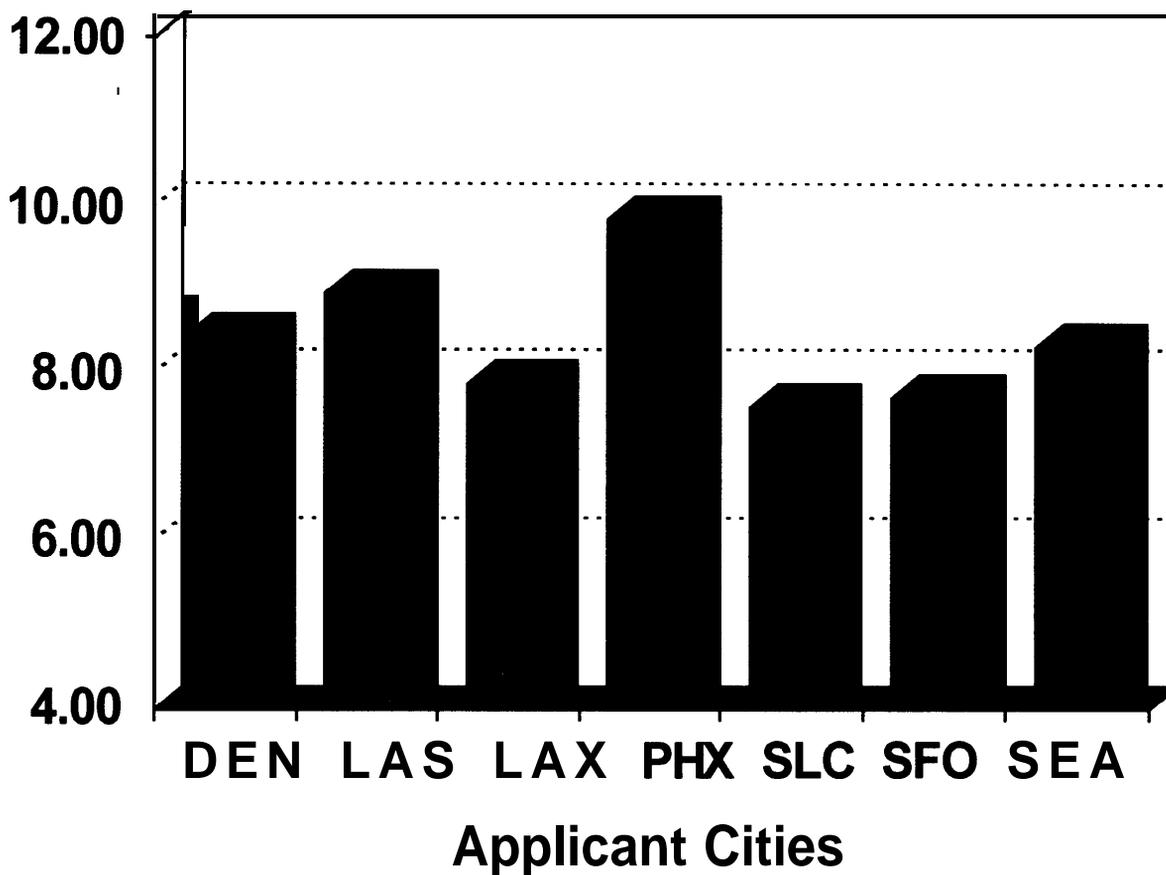
Compound Annual Growth Rate

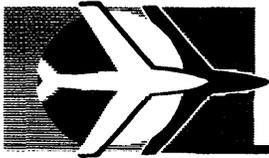




... While *LAS-DCA* O&D Yields Are The 2nd Highest Of The 7 Cities...

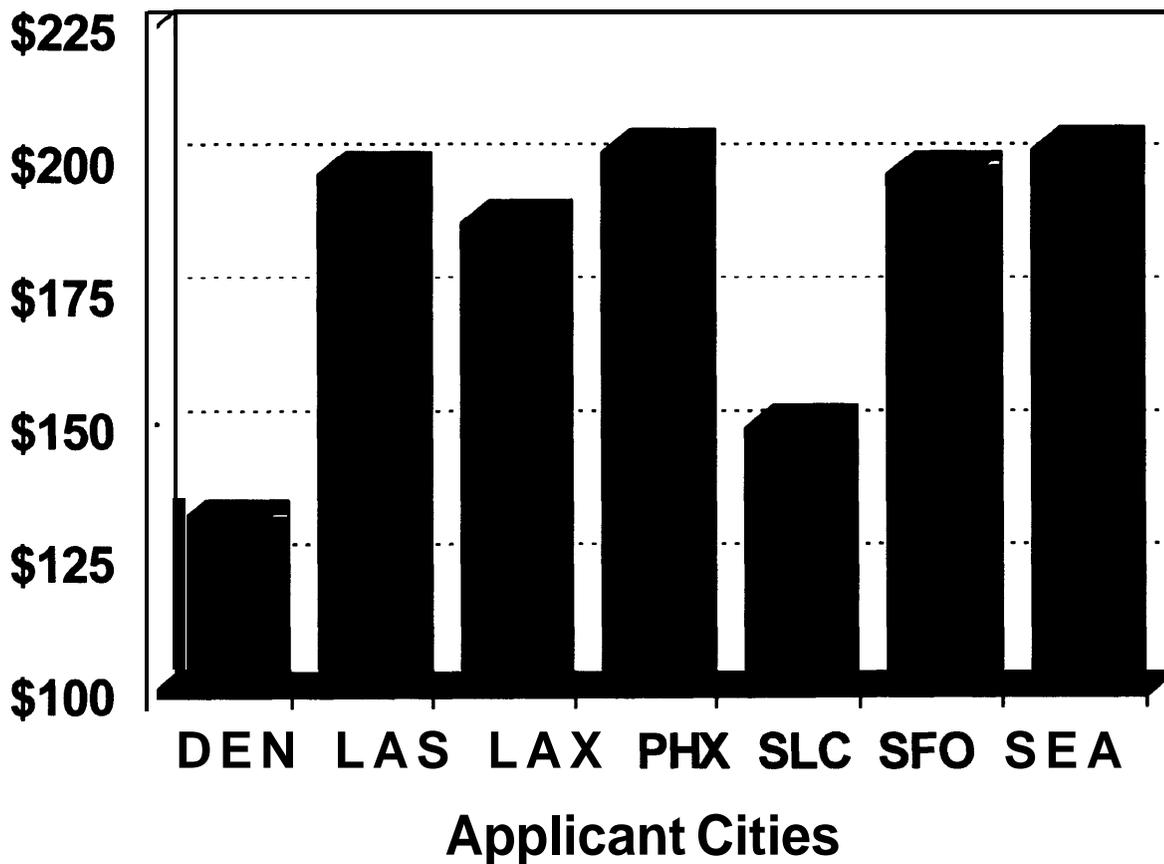
YE 3Q99 Average Yield





... And *LAS-DCA O&D Fares* Are The 3rd Highest In Absolute Terms

YE 3Q99 Average Fare

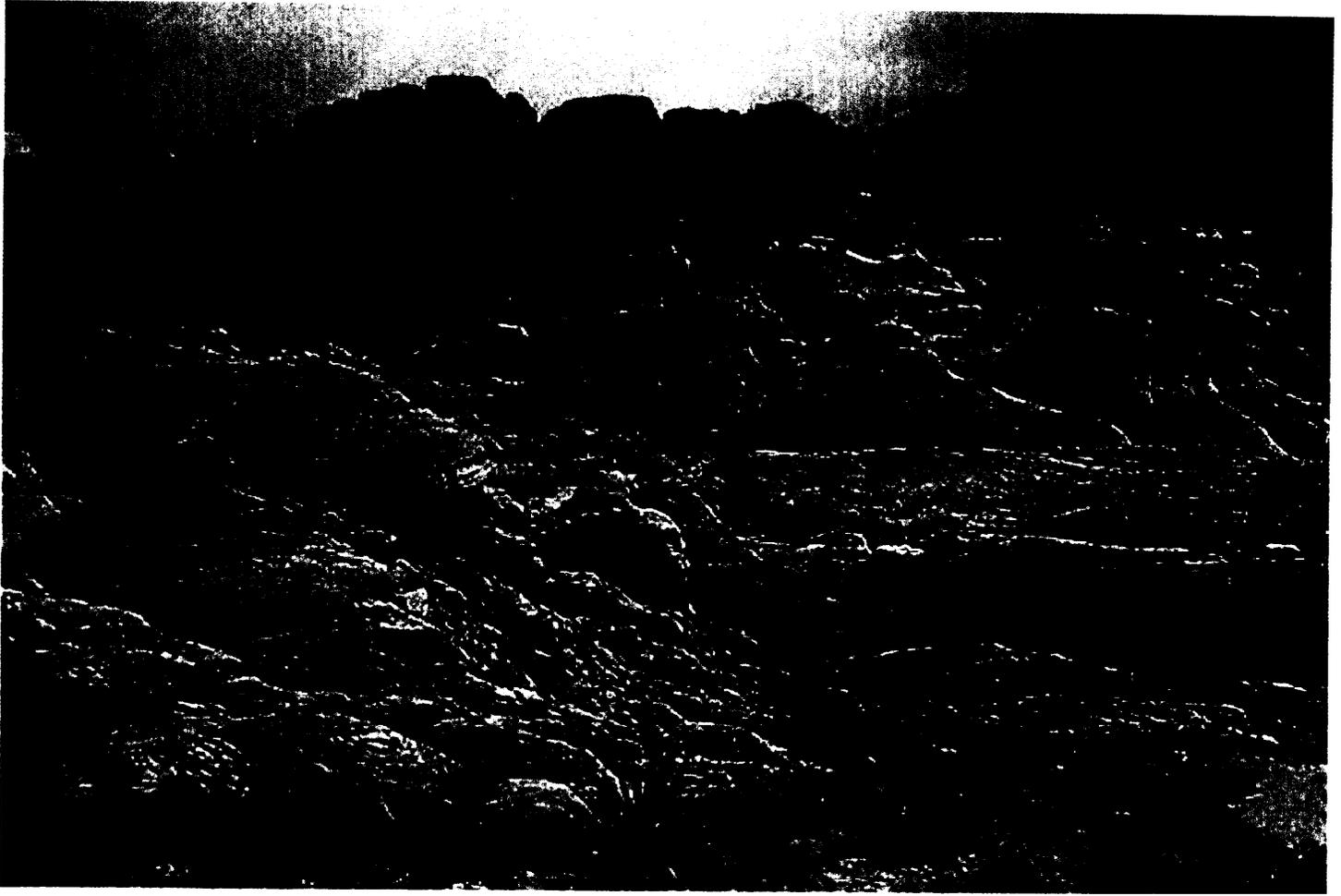




Major LAS-West Coast Markets Have Low Fares For Onward Trips

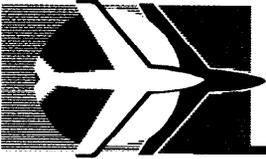
Market	Carriers	O&D Fares
Boise	WN	\$78.70
Burbank	WN	\$54.87
Los Angeles	AA/DL/HA/HP/NW/ N7/UA/WN	\$51.23
Oakland	HP/WN	\$72.96
Ontario	HP/WN	\$53.98
Orange County	AA/HP	\$70.82
Phoenix	HP/WN	\$52.10
Portland	AS/DL/HP/WN	\$77.95
Reno	AA/HP/WN	\$51.04
Sacramento	HP/WN	\$69.89
Salt Lake City	DL/WN	\$61.38
San Diego	HP/WN	\$55.40
San Francisco	HP/N7/UA	\$74.68
San Jose	AA/HP/WN	\$66.77
Seattle	AS/HP/WN	\$87.40
Spokane	HP/WN	\$100.29
Tucson	HP/WN	\$50.61

Source: U.S. DOT OD1A (YE 3Q99)
and May 2000 OAG



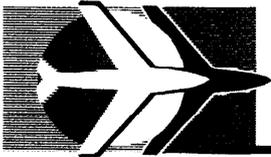
Red Rock Canyon -Awesome Natural Beauty

Series **300** Exhibits



Introduction To Series 300 Exhibits

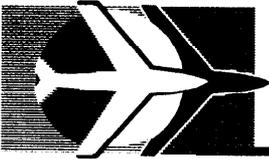
The major network carriers, American, Delta, Northwest, TWA, and United, have applied for routes to large beyond-perimeter destinations. However, these carriers' applications should be rejected on the basis that: (1) The major carriers are substantially larger by any measure than the new entrant applicants (Exhibit LAS-301); (2) The major carriers already have far more DCA slots (Exhibit LAS-302) and carry more DCA passengers (Exhibit LAS-303) than the new entrant applicants; (3) The proposed schedules of carriers such as American, Delta, and United look suspiciously like existing services at Dulles International Airport (IAD), suggesting that one or more of these carriers might just move flights from one Washington airport to another, adding nothing to the regional market capacity (Exhibits LAS-304 to LAS-306); (4) Northwest failed to maximize the utility of the DCA slots by proposing to operate a smaller aircraft, the 124-seat A319, on its DCA-SEA route rather than the much larger B757 proposed by the LAS applicants (Exhibit LAS-307); (5) The network benefits claimed by American, Northwest and TWA are very small, offering little support to their respective proposals and, in the case of Northwest, involving cities that it does not even serve from Seattle (Exhibits LAS-308 to LAS-312); and (6) United's largest connecting markets either have better and faster service to Washington on nonstops to IAD rather than connections at LAX to DCA or already have better and more frequent connecting opportunities to DCA via Chicago O'Hare International Airport (Exhibits LAS-313 and LAS-314). Furthermore, United alone already has more LAX-Washington nonstops than LAS has in total to the Washington area by all carriers (Exhibit LAS-315).



Introduction To Series 300 Exhibits

DCA slots, a limited resource, should be allocated to the low fare, new entrant carriers (Exhibit LAS-316). They are more efficient and will be better able to offer low fares over a sustained period of time (Exhibit LAS-317). But Frontier is the wrong carrier to select in this proceeding. First, it is already operating DEN-BWI service, and thus could very well move its BWI aircraft to DCA (Exhibit LAS-318). Also, Frontier will offer B737 service with only 136 seats, substantially less capacity than the B757 service proposed by both National Airlines with its 175-seat configuration and American West with its 190-seat configuration (Exhibit LAS-319). Las Vegas is the only city where the applicant carriers are both low cost new entrants that can offer a competitive spur to the major network carriers, enhance the public benefits through lower airfares and not create a new network carrier monopoly (Exhibit LAS-320).

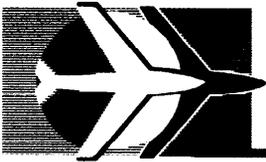
Today, single-plane service in the LAS-DCA market is extremely limited (Exhibit LAS-321). In fact, the market has among the fewest daily one-stop flights of any of the applicant cities (Exhibit LAS-322). Moreover, Las Vegas has among the fewest daily nonstop flights to the Washington area (Exhibit LAS-323). Notwithstanding this lack of capacity, Las Vegas-Washington O&D traffic has grown by an average of 14.4% per annum during the years between 1993 and the year ended third quarter of 1999. On the other hand, all other applicant cities have experienced only singledigit growth during these years. But despite this general market growth, the specific LAS-DCA airport-pair traffic has declined by 3.5% per annum due to the absence of nonstop service and the higher fares charged in the market (Exhibits LAS-324 to LAS-326).



Introduction To Series 300 Exhibits

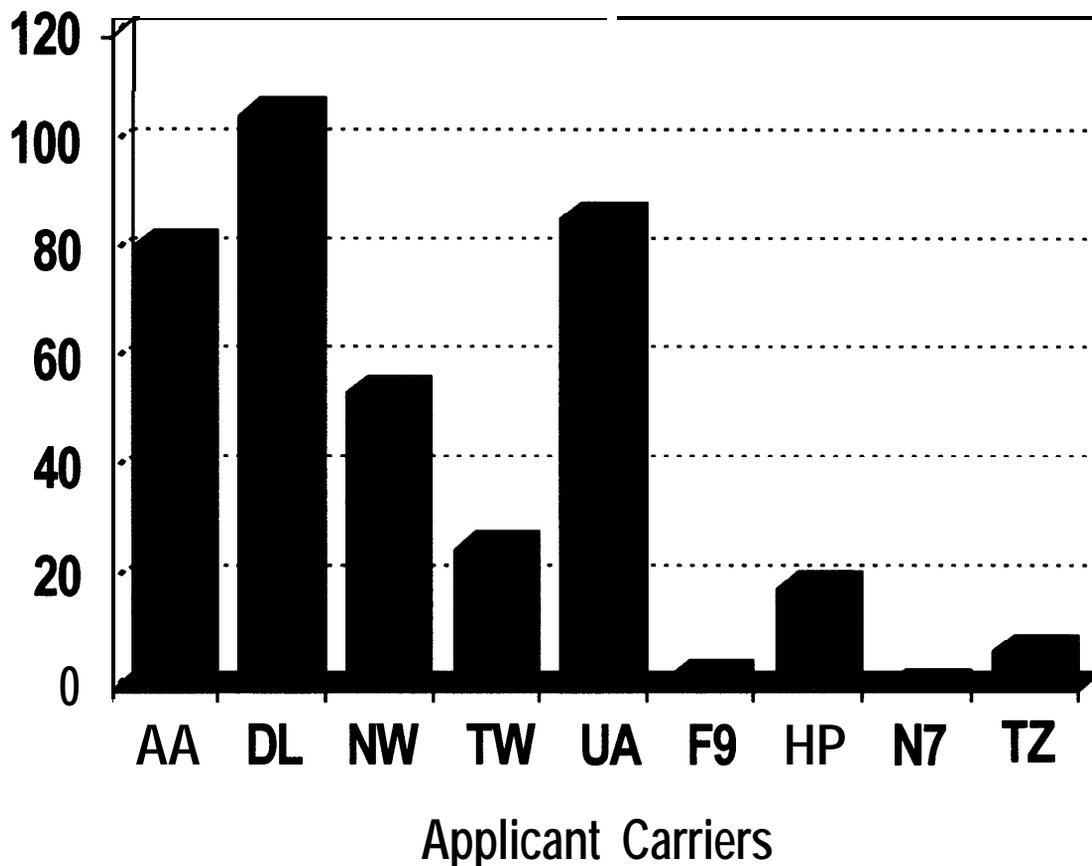
In further evidence of the need for LAS service to Washington, existing services to IAD and BWI are generating average load factors in excess of 80%, limiting the availability of seats. In addition, LAS-DCA passengers will suffer significant circuitry penalties if an award is not made to the Las Vegas applicants (Exhibits LAS-327 to LAS-329).

Overwhelming public benefits can be derived by awarding slots to the DCA-LAS applicants because: (1) Both Las Vegas applicants are new entrants under the definition set forth in "AIR 21" since America West currently has only six slots and National has none (Exhibit LAS-330); (2) National with three daily B757 round trip flights and America West with two daily B757 round trip flights both offer solutions to a market that is suffering inadequate capacity, relatively high load factors, and higher than justified fares (Exhibit LAS-331); (3) The ability of the Las Vegas applicants to successfully serve the market can be demonstrated by the fact that both currently service major east coast markets successfully (Exhibit LAS-332), with many of the markets experiencing load factors generally in excess of 70% and, in a number of cases, in excess of 80% (Exhibit LAS-333); (4) The Las Vegas applicants serve or provide network benefits to beyond-Las Vegas markets (Exhibit LAS-334) and if DOT grants the requested slots to the LAS applicant carriers, then the network benefits of the other applicants offer little incremental value to the traveling public (Exhibit LAS-335); and (5) The addition of LAS-DCA nonstop service is sorely needed to alleviate the extremely high 80% load factors now existing in the Las Vegas-Washington area market while, at the same time, load factors in other applicant city markets fall below this 80% level and, in the case of Salt Lake City, even below 60% (Exhibit LAS-336).

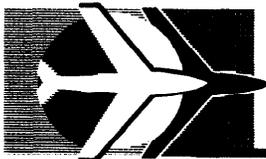


On A System Basis, The Major Carriers Are Substantially Larger Than The New *Entrant* Applicants

1999 Total Enplaned Passengers (Millions)

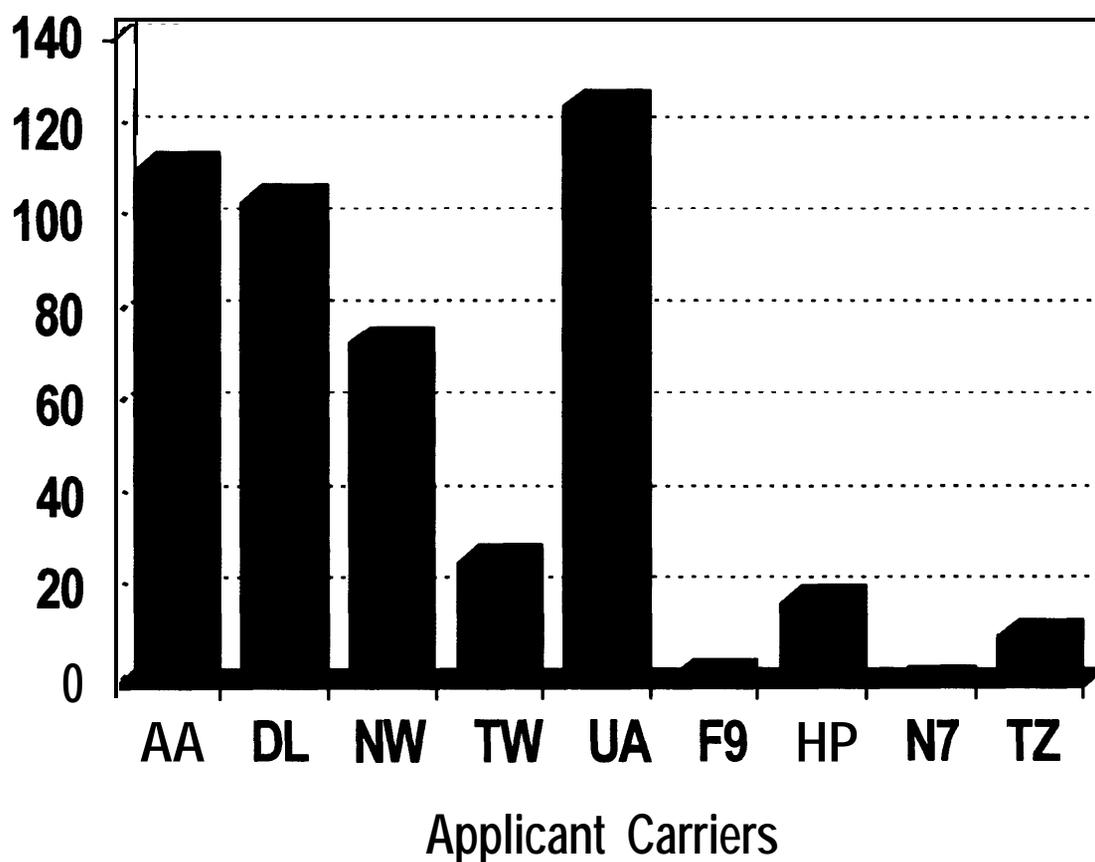


Whether Measured By Passengers . . .

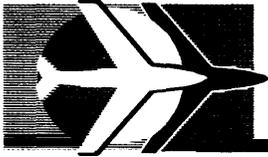


On A System Basis, The Major Carriers Are Substantially Larger Than The New Entrant Applicants

1999 Total RPMs (Billions)

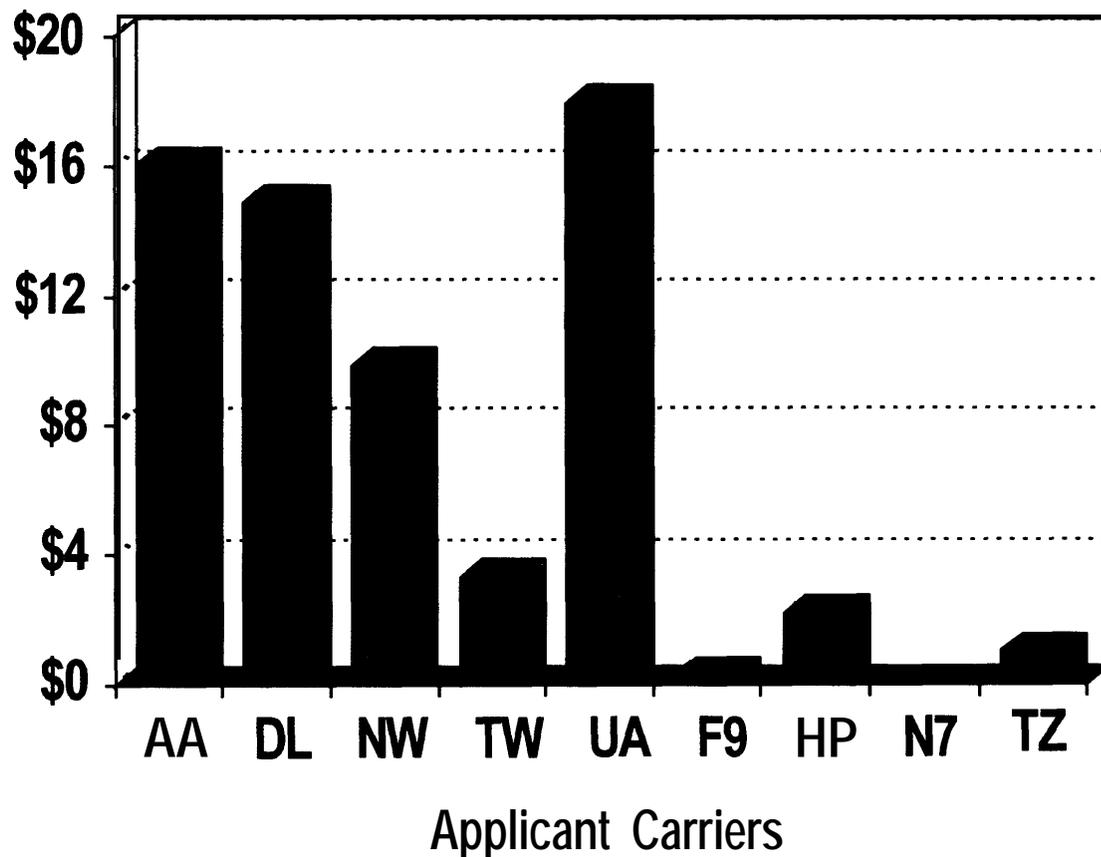


... Or By *RPMs* ...

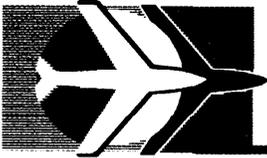


On A System Basis, The *Major* Carriers Are *Substantially* Larger *Than* The New Entrant Applicants

1999 Total Operating Revenues (Billions)

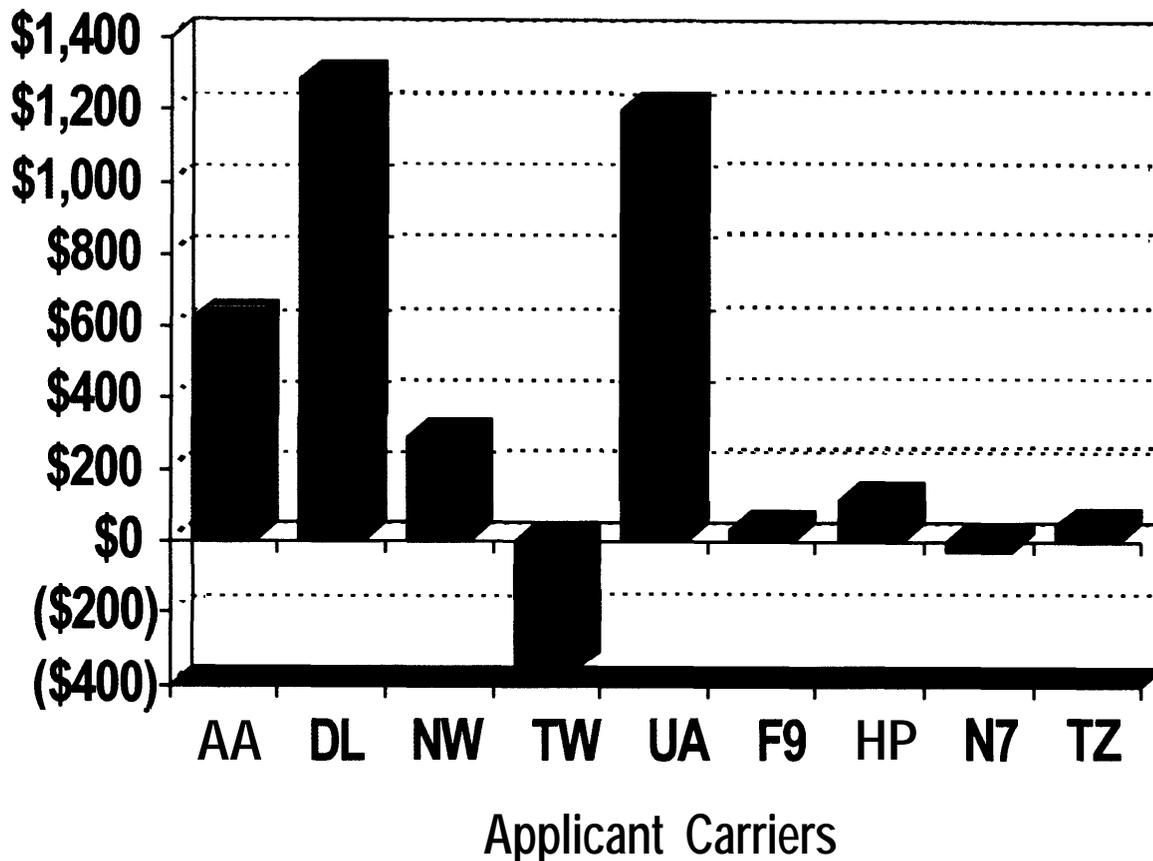


... Or By Operating Revenues ...

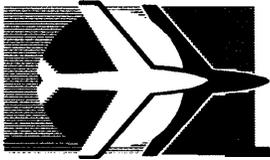


On A System Basis, The *Major* Carriers Are Substantially larger *Than* The New *Entrant* Applicants

1999 Net Profits (Millions)

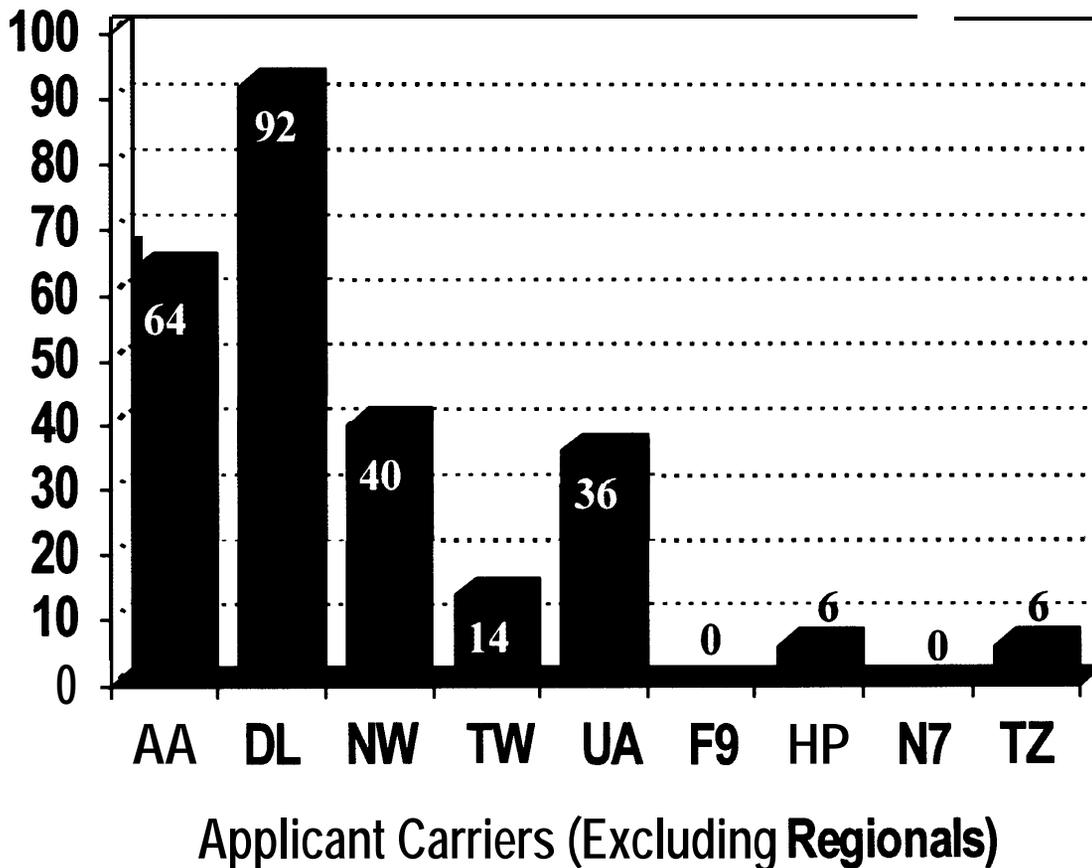


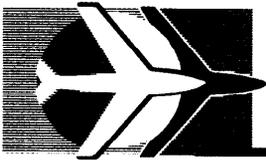
... Or By Net Profits!



The Major Carrier Applicants Already *Have* Fur More *DCA Slots* Than The New *Entrant* Applicants

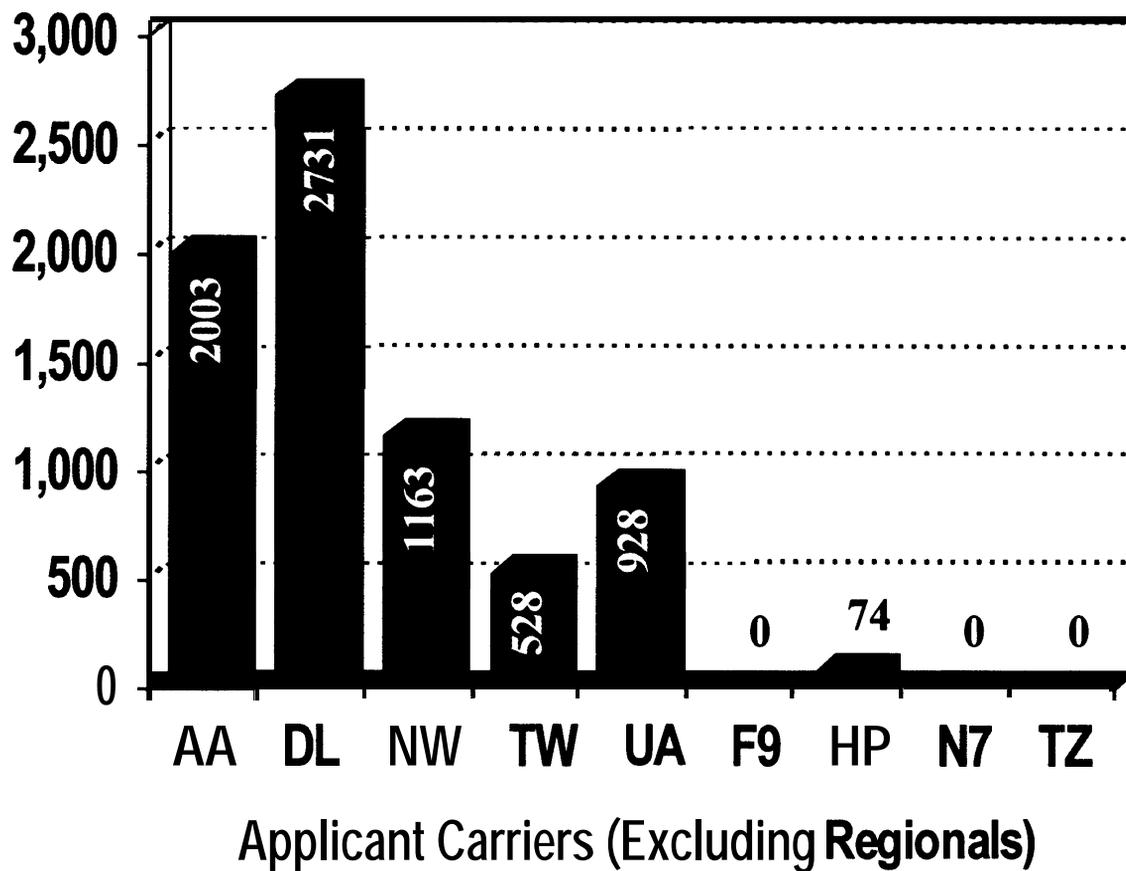
Daily DCA Slots





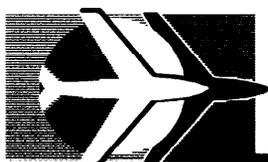
The Major Carriers Already Carry Far More *DCA* Passengers Than The New Entrant Applicants

1999 Total DCA Passengers (000)



Note: Delta includes Delta Shuttle.

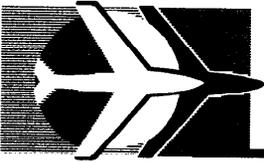
Source: Metropolitan Washington
Airports Authority



American's Proposed *LAX-DCA Nonstops* look Suspiciously **like** Current *LAX-IAD Nonstops*

Market/Airport	Dept.	Arr.	Elapsed Time
<u>Washington-LAX</u>			
Current from IAD	09:10	10:36	05:26
Proposed from DCA	09:15	10:45	05:30
Current from IAD	11:15	13:47	05:32
Current from IAD	15:00	17:26	05:26
Proposed from DCA	15:10	18:25	05:35
Current from IAD	18:00	20:36	05:36

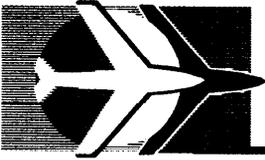
... Where Is The Public Benefit?



Delta's Proposed *SLC-DCA* Nonstops look Suspiciously Like Current *SLC-IAD* Nonstops

Market/Airport	Dept.	Arr.	Elapsed Time
<u><i>SLC-Washington</i></u>			
[REDACTED]			
Proposed to DCA	14:20	20:20	04:00
Current to IAD	16:40	22:48	04:08

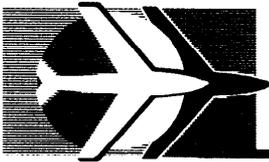
If Delta Simply Shifts Some Of Its *SLC*
Nonstop From *IAD* To *DCA* . . .



Delta's Proposed *SLC-DCA* *Nonstops* look Suspiciously Like Current *SLC-IAD* Nonstops

Market/Airport	Dept.	Arr.	Elapsed Time
<u><i>Washington-SLC</i></u>			
[REDACTED]			

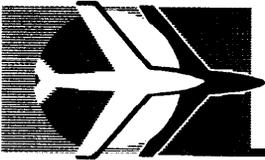
... Where Is The Public Benefit?



United's Proposed *LAX-DCA* *Nonstops* Look Suspiciously like Current *LAX-IAD* Nonstop

Market/Airport	Dept.	Arr.	Elapsed Time
<u><i>LAX- Washington</i></u>			
Current to IAD	06:35	14:23	04:48
Current to IAD	07:00	15:50	04:50
Current to IAD	08:00	16:50	04:50
Current to IAD	09:00	16:54	04:54
Current to IAD	10:50	18:41	04:51
Current to IAD	12:15	19:53	04:38
Current to IAD	13:00	20:49	04:49
Proposed to DCA	13:45	21:30	04:45
Current to IAD	14:50	22:40	04:50
Current to IAD	16:30	00:13	04:43
Current to IAD	22:00	05:44	04:44
Current to IAD	23:15	07:02	04:47

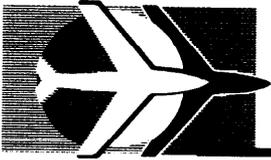
If *United* Simply Shifts Some Of *Its* LAX
Nonstops From *IAD* To *DCA* . . .



United's Proposed *LAX-DCA* *Nonstops* Look Suspiciously Like Current *LAX-IAD* *Nonstops*

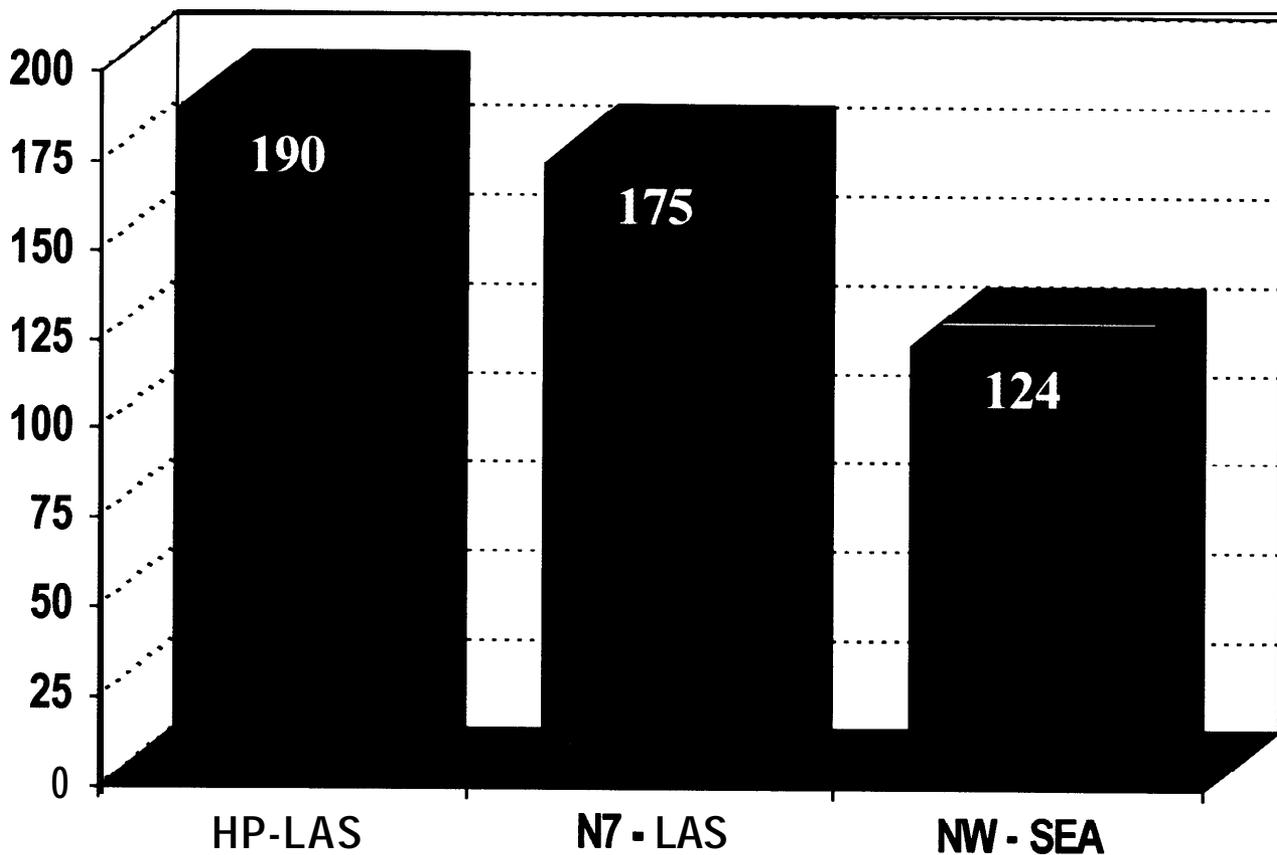
Market/Airport	Dept.	Arr.	Elapsed Time
<u>Washington-LAX</u>			
[REDACTED]			
Current from IAD	09:10	11:34	05:24
Current from IAD	11:20	13:39	05:19
Current from IAD	13:05	15:23	05:18
Current from IAD	15:20	17:38	05:18
[REDACTED]			
Current from IAD	17:50	20:04	05:14
Current from IAD	19:35	22:03	05:28
Current from IAD	21:45	00:16	05:31

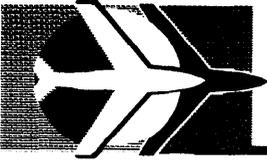
... Where Is The Public Benefit?



Awarding Slots To Northwest Will Not Maximize Public Benefits

Seats Per Departure To DCA



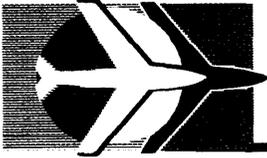


American's Six Behind-LAX Jet Connecting Markets Already Have Frequent Service To DCA

Market	Proposed LAX Connections	Current AA Connections	
		At ORD	At DFW
HNL-DCA	1	1	2
OGG-DCA	1	0	1
LAS-DCA	1	4	6
RNO-DCA	0	3	3
SFO-DCA	2	6	7
SJC-DCA	1	5	6

Notes: Eastbound connections only.
Assumes start of OGG-DFW service.

Source: May 2000 OAG and
American Application



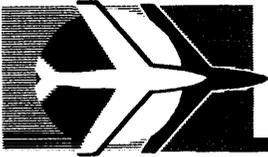
American's 4 Behind-LAX Markets Receiving *1st* Online, One-Stop Service To *DCA* Are *Very Small*

DCA Market	Market Rank	O&D Passengers	
		Annually	PDEW
Bakersfield, CA	217	1,780	2.4
Monterey, CA	204	2,130	2.9.
San Luis Obispo, CA	276	700	1.0
Santa Barbara, CA	193	<u>2,400</u>	<u>3.3.</u>
Total		7,010	9.6.



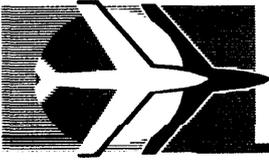
Northwest Itself Does Not Serve Any City From SEA That It *Claims* Will Benefit From *SEA-DCA* Service

Market	Purported Benefit	Served From SEA By Northwest?	
Eugene, OR	1st One-Stop to DCA	No	
Fairbanks, AK	1st One-Stop to DCA	No	
Kalispell, MT	1st One-Stop to DCA	No	
Butte, MT	<hr/> ↑ 1st Competitive ↓ <hr/>	No	
Great Falls, MT		No	
Helena, MT		No	
Kelowna, BC		One-Stop to Washington	No
Pasco, WA		No	
Sun Valley, ID		No	
Victoria, BC		No	



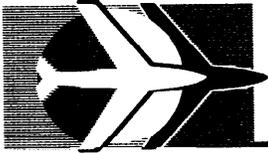
Northwest Itself Does Not Serve Any City From SEA *That It Claims* Will Benefit From *SEA-DCA* Service

Market	Purported Benefit	Served From SEA By Northwest?
Bellingham, WA	<hr/> 1st One-Stop Service to Washington <hr/>	No
Juneau, AK		No
Ketchikan, AK		No
Lewiston, ID		No
Medford, OR		No
Moses Lake, WA		No
Port Angeles, WA		No
Pullman, WA		No
Redmond, OR		No
Sitka, AK		No
Walla Walla, WA		No
Wenatchee, WA		No
Yakima, WA		No



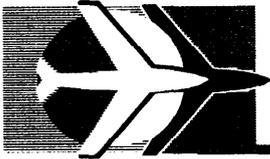
Northwest's 3 Behind-SEA Markets Receiving *1st* Online, One-Stop Service To *DCA* Are Very Small

DCA Market	Market Rank	O&D Passengers	
		Annually	PDEW
Eugene, OR	215	1,850	2.5.
Fairbanks, AK	184	2,830	3.9.
Kalispell, MT	237	<u>1,380</u>	<u>1.9</u>
Total		6,060	8.3



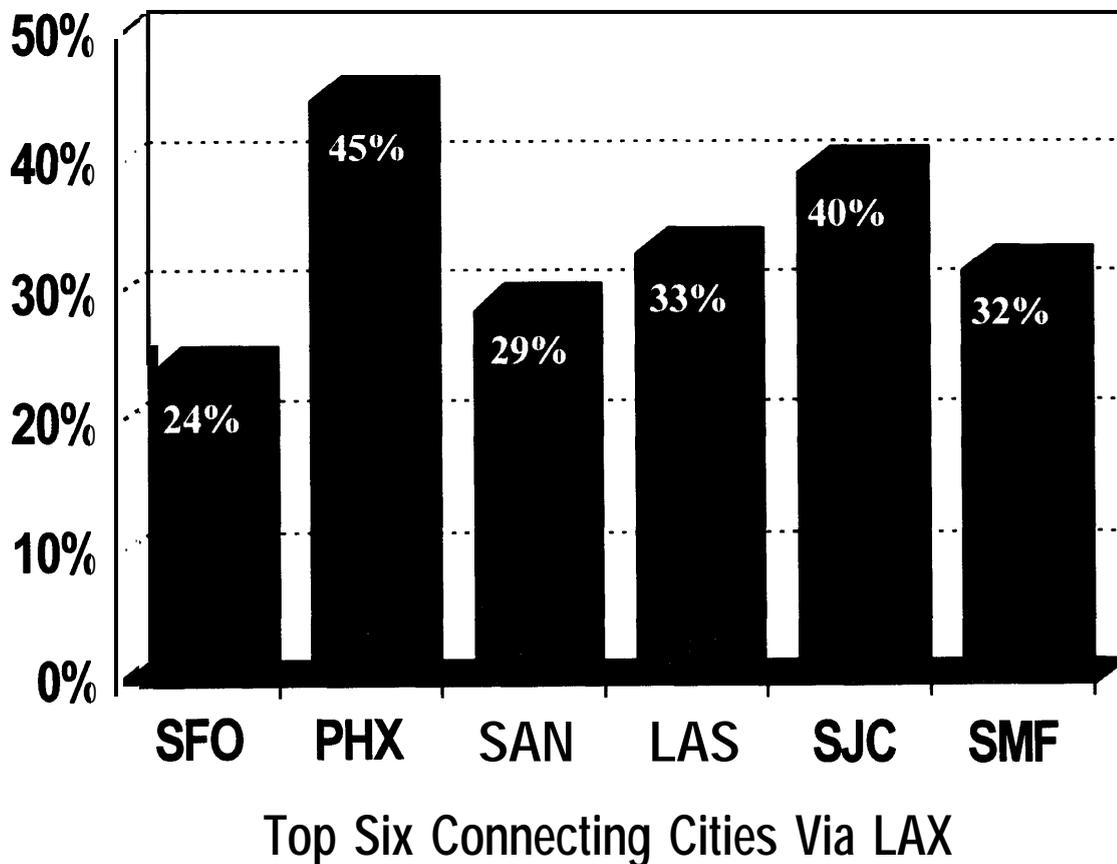
TWA's Total Of Six Behind-LAX Markets Will Offer Little Support To Its Proposed LAX-DCA Service

DCA Market	Market Rank	O&D Passengers	
		Annually	PDEW
Bakersfield, CA	217	1,780	2.4.
Kona, HI	264	910	1.3.
Monterey, CA	204	2,130	2.9.
Palm Springs, CA	140	6,880	9.4
San Luis Obispo, CA	276	700	1.0
Santa Barbara, CA	193	<u>2,400</u>	<u>3.3</u>
Total		14,800	20.3

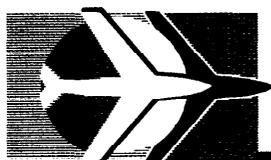


United's Six largest Behind-LAX Connecting *Markets Have Better Service On Nonstops To IAD*

% Improvement In Total Elapsed Time: IAD Nonstops Vs. LAX Connections To DCA

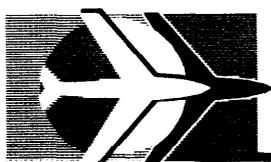


Source: May 2000 OAG and
United Application



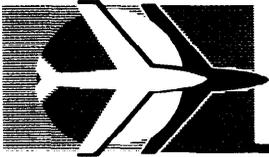
United's Six Largest Behind-LAX Connecting Markets Have Better Service *On Nonstops To IAD*

Market	Dept.	Arr.	Elapsed Time	Nonstop % Better
<u>SFO- Washington</u>				
Nonstop to IAD	06:30	14:41	05:11	
Via LAX to DCA	06:00	15:50	06:50	24.1%
<u>PHX-Washington</u>				
Nonstop to IAD	08:59	16:10	04:11	
Via LAX to DCA	10:54	21:30	07:36	45.0%
<u>SAN-Washington</u>				
Nonstop to IAD	08:40	16:21	04:41	
Via LAX to DCA	06:15	15:50	06:35	28.9%

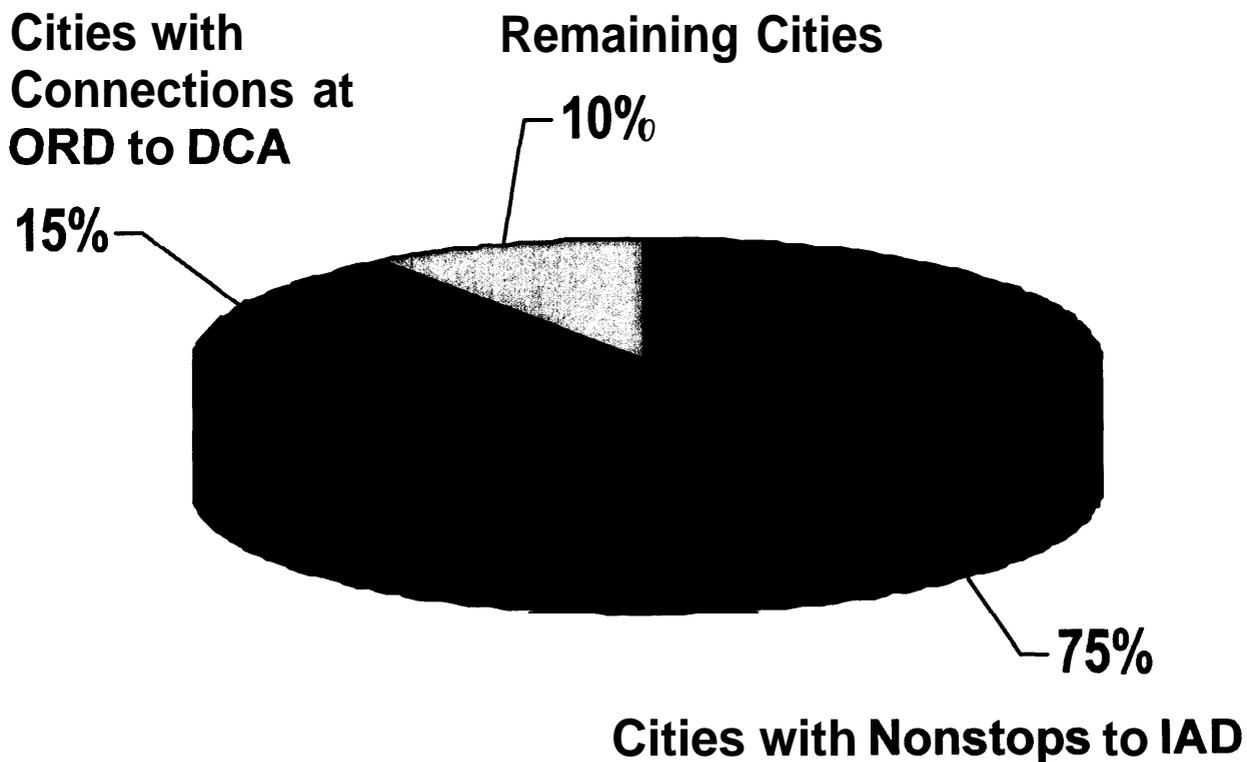


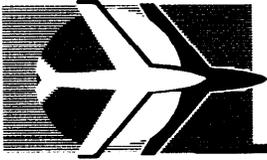
United's Six largest Behind-LAX Connecting Markets Have **Better** Service On Nonstop To **IAD**

Market	Dept.	Arr.	Elapsed Time	Nonstop % Better
<u>LAS-Washington</u>				
Nonstop to IAD	09:00	16:27	04:27	
Via LAX to DCA	06:10	15:50	06:40	33.3%
<u>SJC- Washington</u>				
Nonstop to IAD	08:30	16:18	04:48	
Via LAX to DCA	10:34	21:30	07:56	39.5%
<u>SMF- Washington</u>				
Nonstop to IAD	08:20	16:08	04:48	
Via LAX to DCA	11:27	21:30	07:03	31.9%



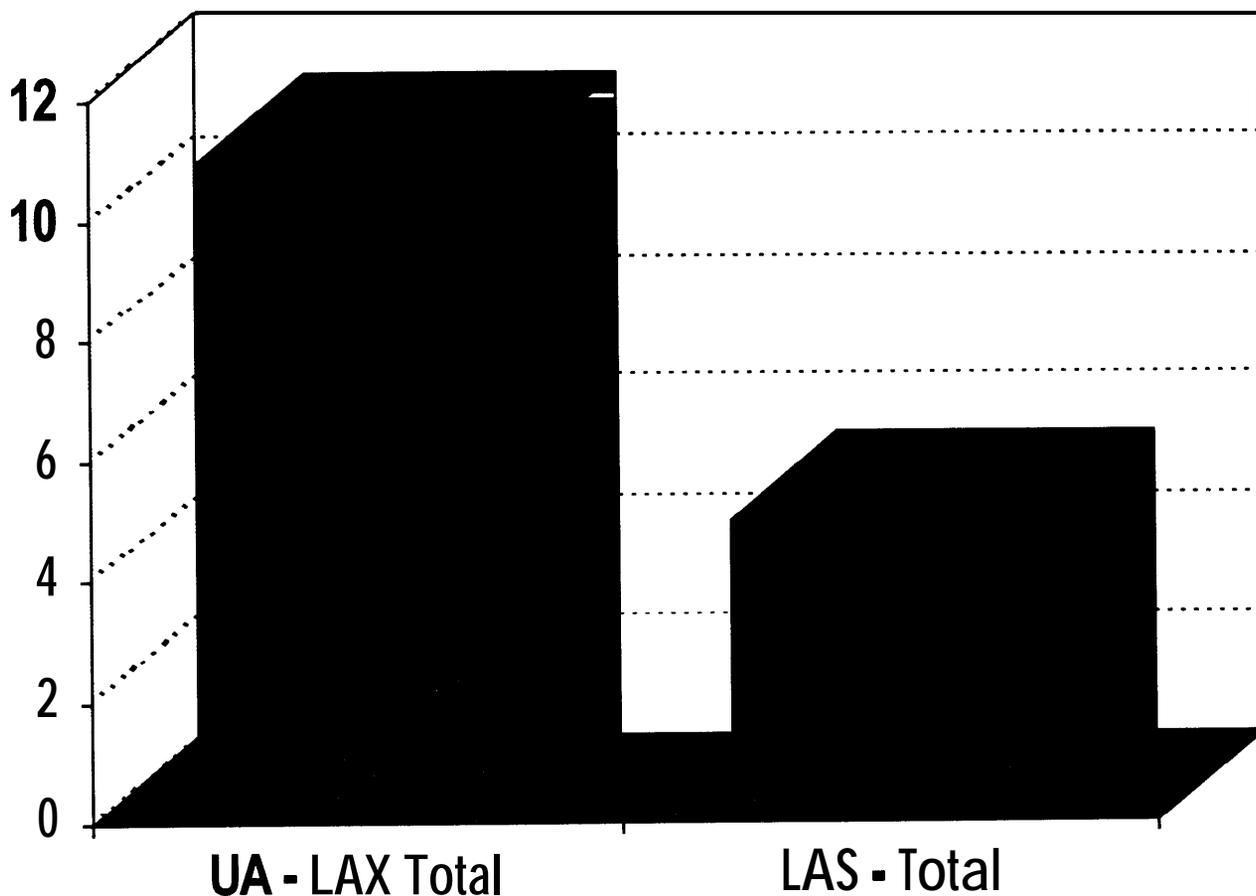
90% Of United's Projected Pool Of **LAX-DCA** Connecting Traffic Already Has Equal Or **Better** Service To Washington

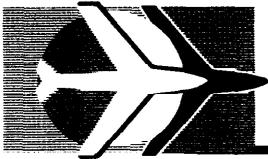




United Alone Already Has More LAX- Washington Nonstop Than *LAS Has In Total*

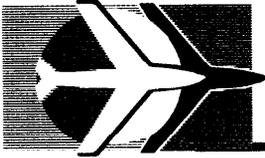
Daily Nonstop Flights To Washington





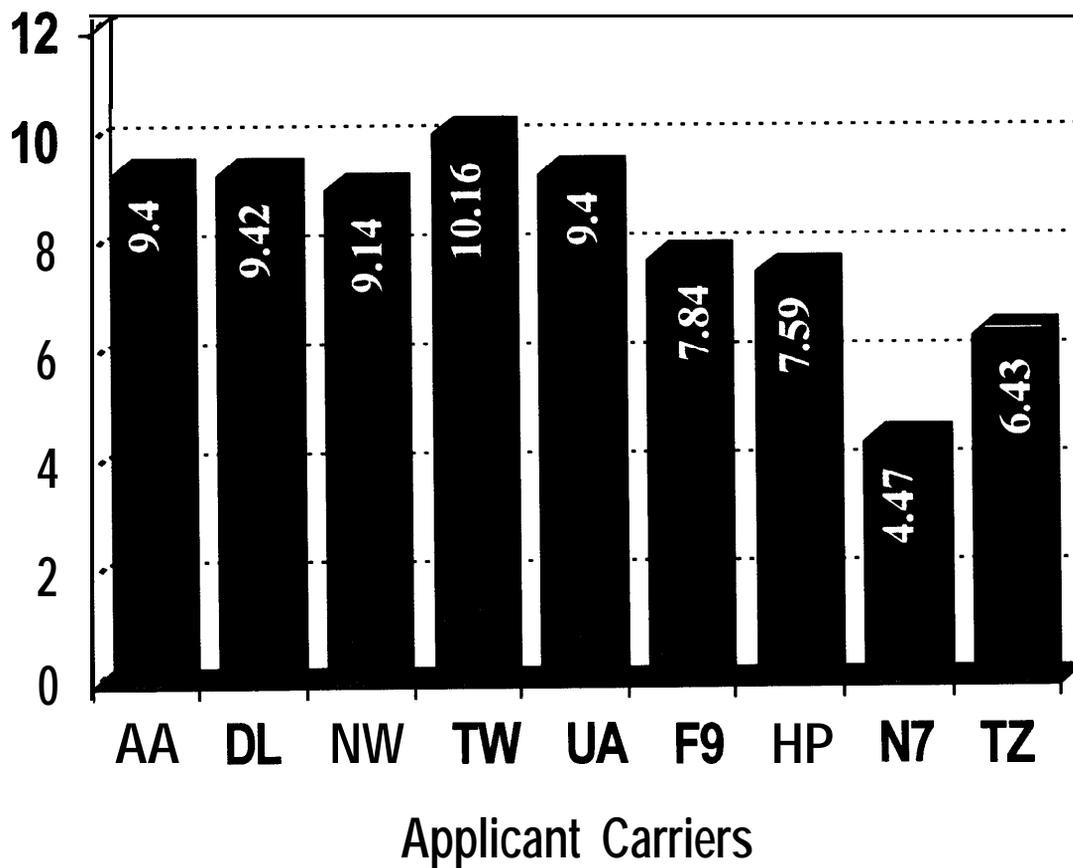
DCA Slots Should Only Go To Low Fare, New *Entrant* Carriers

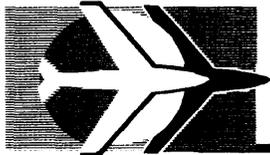
DCA Market	Applicant Carrier	Low Fare New Entrant?
Denver	Frontier	Yes
Las Vegas	America West	Yes
	National	Yes
Los Angeles	American	No
	American Trans Air	Yes
	Trans World	No
	United	No
Phoenix	America West	Yes
Salt Lake City	Delta	No
San Francisco	American Trans Air	Yes
Seattle	Northwest	No



On A System Unit Cost Basis, The New Entrant Applicants Are More Efficient *Than* The Major Carriers

1999 Cost Per ASM (¢)

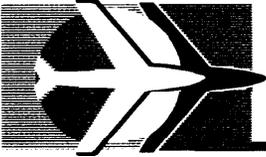




Frontier's Proposed *DEN-DCA* Nonstops Look Suspiciously Like Current *DEN-BWI* Nonstops

Market/Airport	Dept.	Arr.	Elapsed Time
<u><i>DEN-Washington</i></u>			
Proposed to DCA	15:30	20:50	03:20
Current to BWI	18:45	23:59	03:14

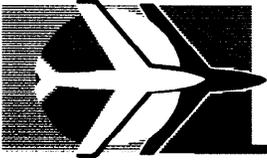
If *Frontier* Simply Shifts Some Of *Its* DEN Nonstops From *BWI* To *DCA* . . .



Frontier's Proposed *DEN-DCA* *Nonstops* Look Suspiciously Like Current *DEN-BWI* *Nonstops*

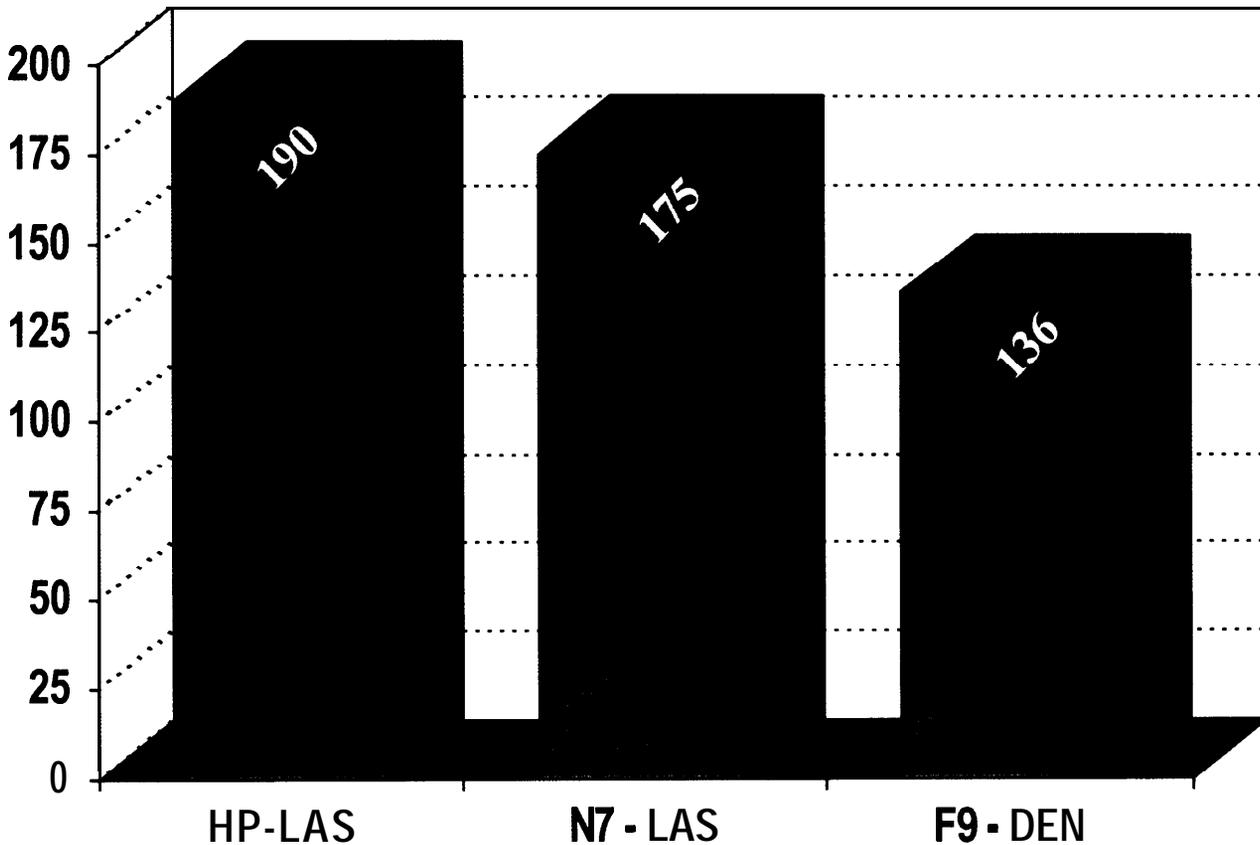
Market/Airport	Dept.	Arr.	Elapsed Time
<u><i>Washington-DEN</i></u>			
Proposed from DCA	08:20	11:00	02:50
Current from DEN	12:00	01:00	02:50
Current from BWI	07:50	10:40	02:50
Proposed from DCA	10:00	12:50	02:50

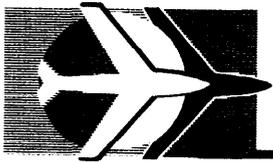
... Where Is The Public Benefit?



Awarding *Slots To Frontier* Will Not Maximize Public Benefits

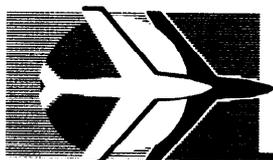
Seats Per Departure To DCA





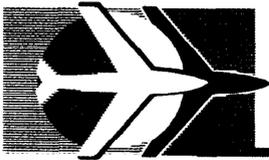
DOT Can Avoid Creating A New Monopoly Market At *DCA* By Selecting Both low Fare, New Entrant Applicants *At LAS*

DCA Market	Applicant Carrier	Monopoly If Selected?
Denver	Frontier	Yes
Las Vegas	America West	No
	National	No
Los Angeles	American	No
	American Trans Air	No
	Trans World	No
	United	No
Phoenix	America West	Yes
Salt Lake City	Delta	Yes
San Francisco	American Trans Air	Yes
Seattle	Northwest	Yes



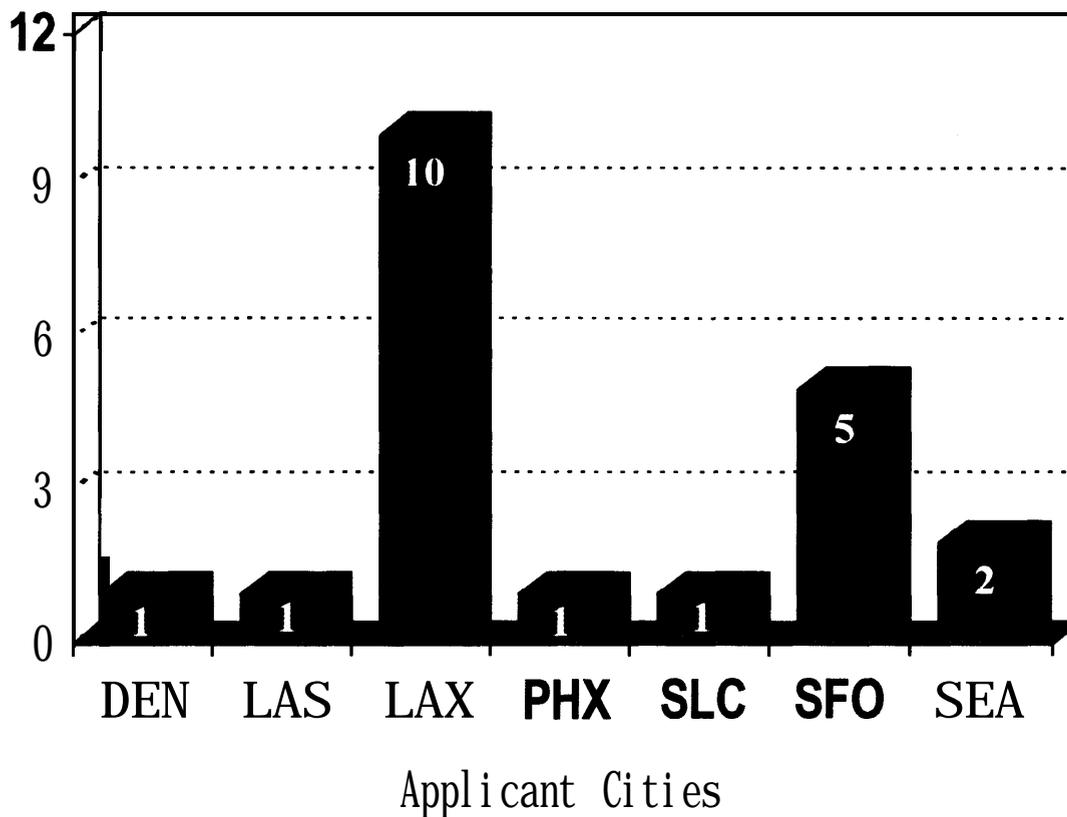
Single-Plane Service In The **LAS-DCA Market Is Very limited**

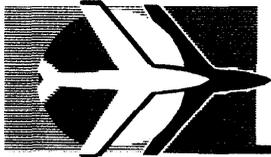
Carrier	Equip.	Freq.	Dept.	Arr.	Hub(s)
<u>LAS-DCA</u>					
Continental	MD80	Daily	07:15	17:19	IAH
<u>DCA-LAS</u>					
American	MD80	Daily	08:40	12:35	DFW
America West	A319	X6	09:10	14:38	CMH & PHX
US Airways	A319	X6	18:46	23:12	CLT
Northwest	B757	X6	19:40	23:48	MSP



The *LAS-DCA Market Has Among The Fewest One-Stop Flights*

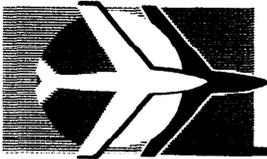
Daily One-Stop Flights To DCA





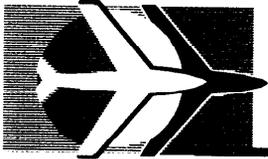
The *LAS-DCA* Market Has Among The fewest One-Stop *Flights*

Carrier	Equip.	Freq.	Dept.	Arr.	Hub(s)
<u>DEN-DCA</u>					
Continental	B737-500	X6	10:45	19:04	EWR
<u>LAS-DCA</u>					
Continental	MD80	Daily	07:15	17:19	IAH
<u>LAX-DCA</u>					
American	B737-800	Daily	06:20	16:00	ORD
Delta	B757	Daily	06:30	16:03	CVG
Am. Trans Air	B757	X7	06:45	16:25	MDW
US Airways	B757	Daily	07:40	17:15	PIT
Northwest	A320	X6	10:05	19:50	MSP
Continental	B737-700	X6	13:15	22:35	CLE
Northwest	A320	X6	13:30	23:02	MEM
US Airways	B757	Daily	13:30	23:09	PIT
America West	A319	X5	23:00	08:09	CMH
Continental	B737-700	X56	23:05	09:00	CLE



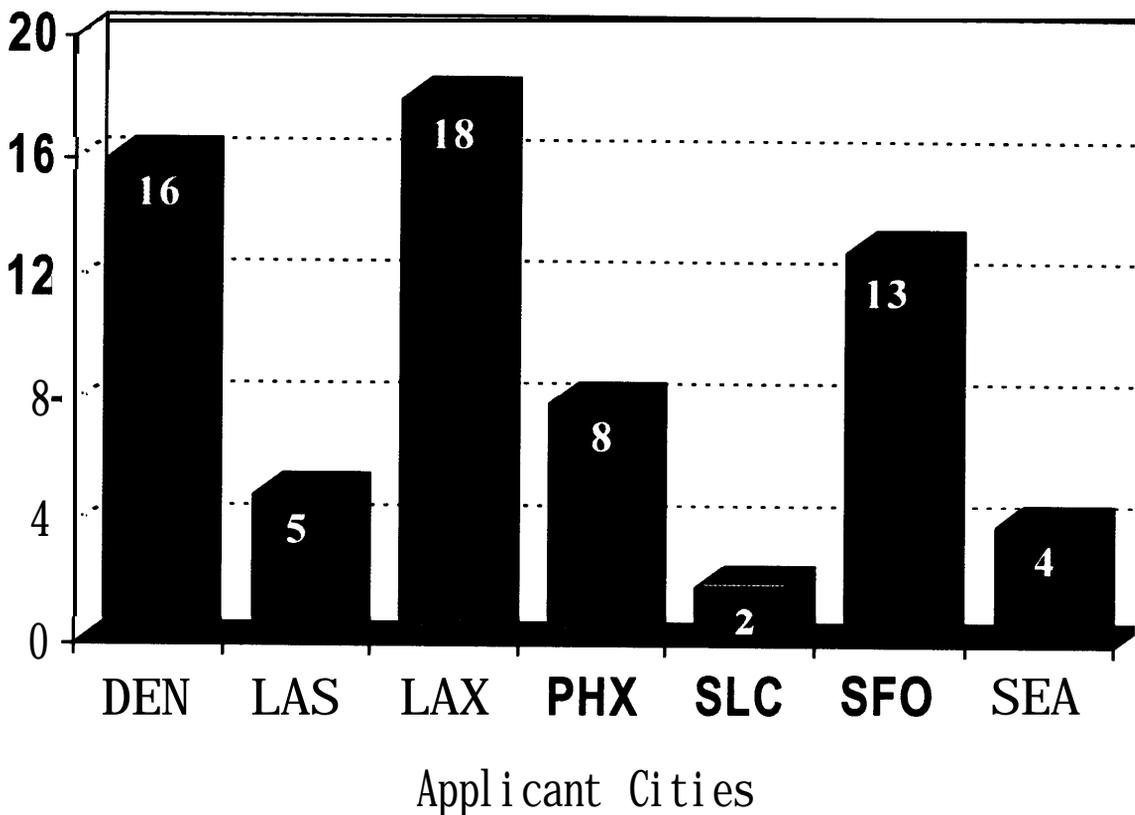
The *LAS-DCA* Market *Has Among* The *Fewest* One-Stop Flights

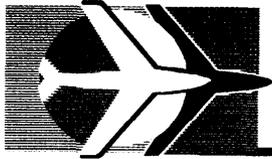
Carrier	Equip.	Freq.	Dept.	Arr.	Hub(s)
<u>PHX-DCA</u>					
America West	A319	Daily	07:31	15:59	CMH
<u>SLC-DCA</u>					
American	B727-200	Daily	12:58	21:08	DFW
<u>SFO-DCA</u>					
Trans World	B757	Daily	00:35	10:45	STL
Continental	B737-700	X6	06:00	15:49	CLE
Trans World	B757	Daily	08:55	19:00	STL
US Airways	A319	Daily	10:52	20:43	PHL
American	B737-800	X6	15:02	00:44	ORD
<u>SEA-DCA</u>					
Northwest	B757	Daily	08:45	18:39	DTW
Northwest	B757	Daily	22:45	08:26	DTW



The LAS- Washington Area Market Has Fewer Nonstop Than Most Of The Applicant Cities

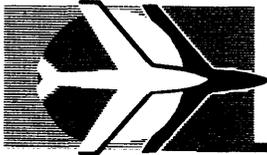
Daily Nonstop Flights To Washington





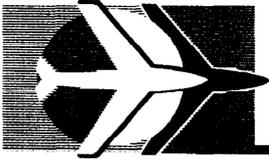
The LAS- Washington Area Market *Has Fewer Nonstops Than Most Of The Applicant Cities*

Market/Carrier	Washington Area Airport	Nonstop Flights
<u>DEN-Washington</u>		
United	IAD	9
United	BWI	5
Frontier	BWI	2
<u>LAS- Washington</u>		
United	IAD	2
America West	BWI	2
Southwest	BWI	1
<u>LAX-Washington</u>		
United	IAD	10
American	IAD	4
US Airways	BWI	3
United	BWI	1



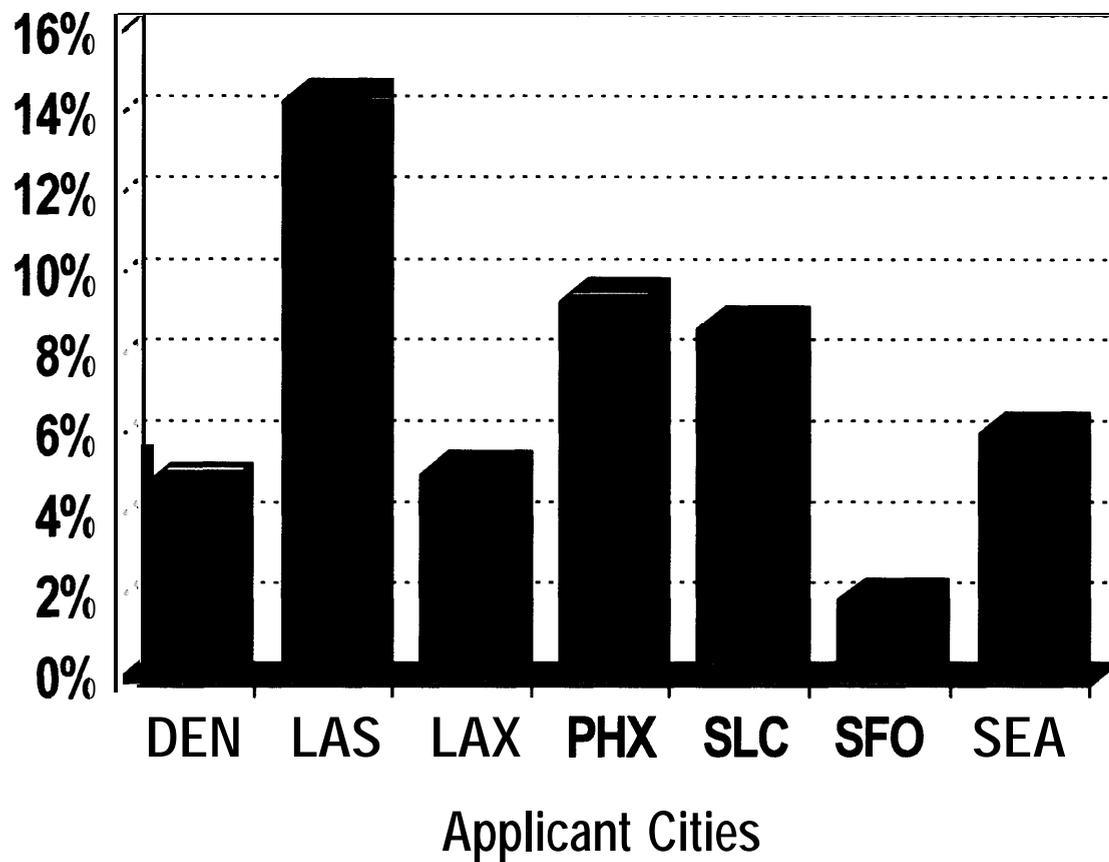
The LAS-Washington Area Market Has Fewer *Nonstops Than Most Of The Applicant Cities*

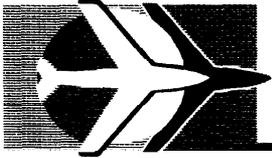
Market/Carrier	Washington Area Airport	Nonstop Flights
<u>PHX-Washington</u>		
America West	BWI	4
Southwest	BWI	3
United	IAD	1
<u>SLC-Washinaton</u>		
Delta	IAD	2
<u>SFO-Washington</u>		
United	IAD	9
United	BWI	2
US Airways	BWI	2
<u>SEA-Washington</u>		
United	IAD	4



LAS- Washington Area O&D Passengers Had The Most Growth

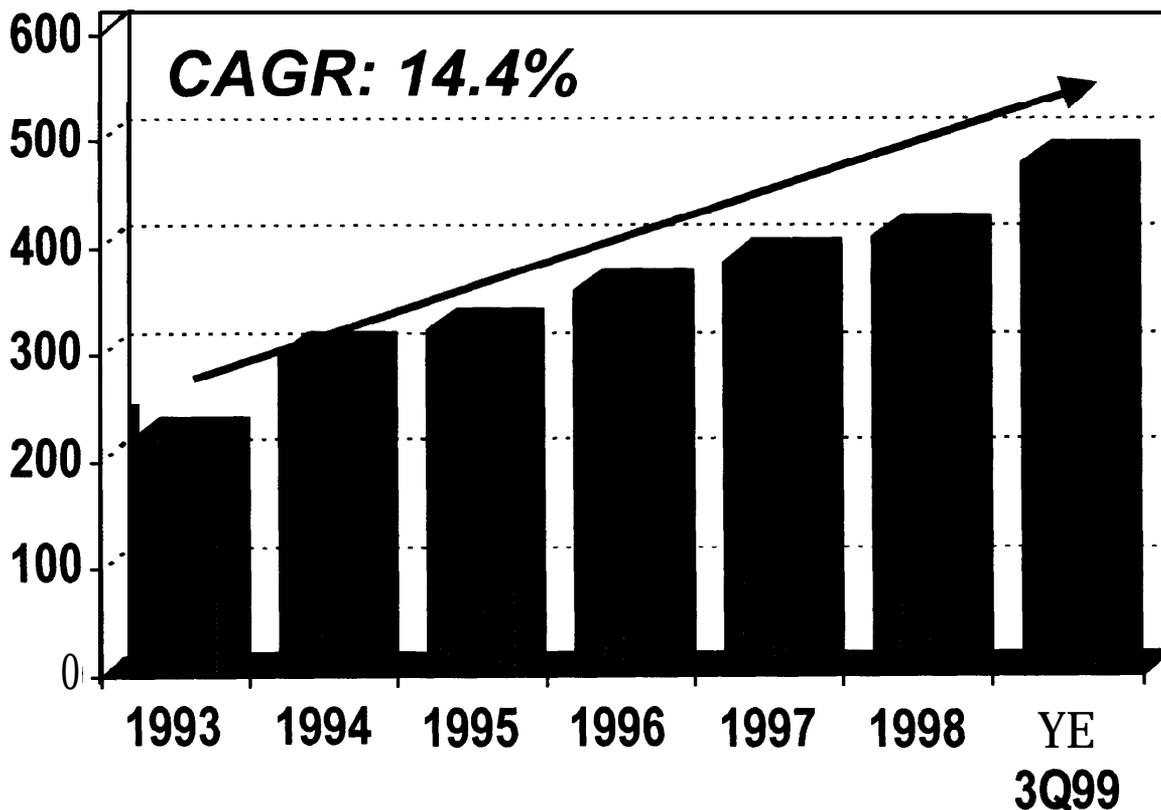
Compound Annual Growth Rate



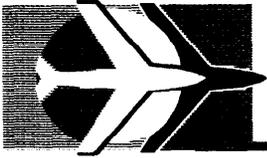


Las Vegas-Washington Area O&D Passengers *Have* Grown . . .

Annual Passengers (000)

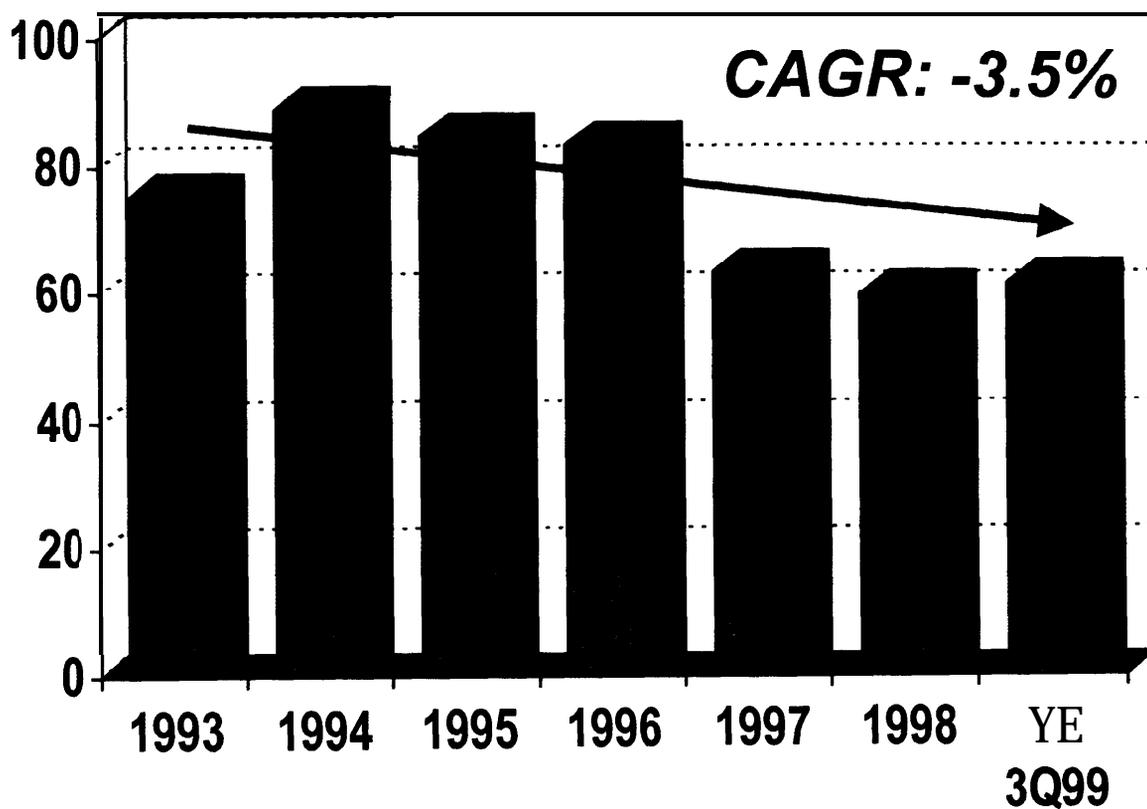


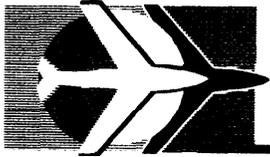
But . . .



LAS-DCA O&D Passengers *Have Declined Without Nonstop Service*

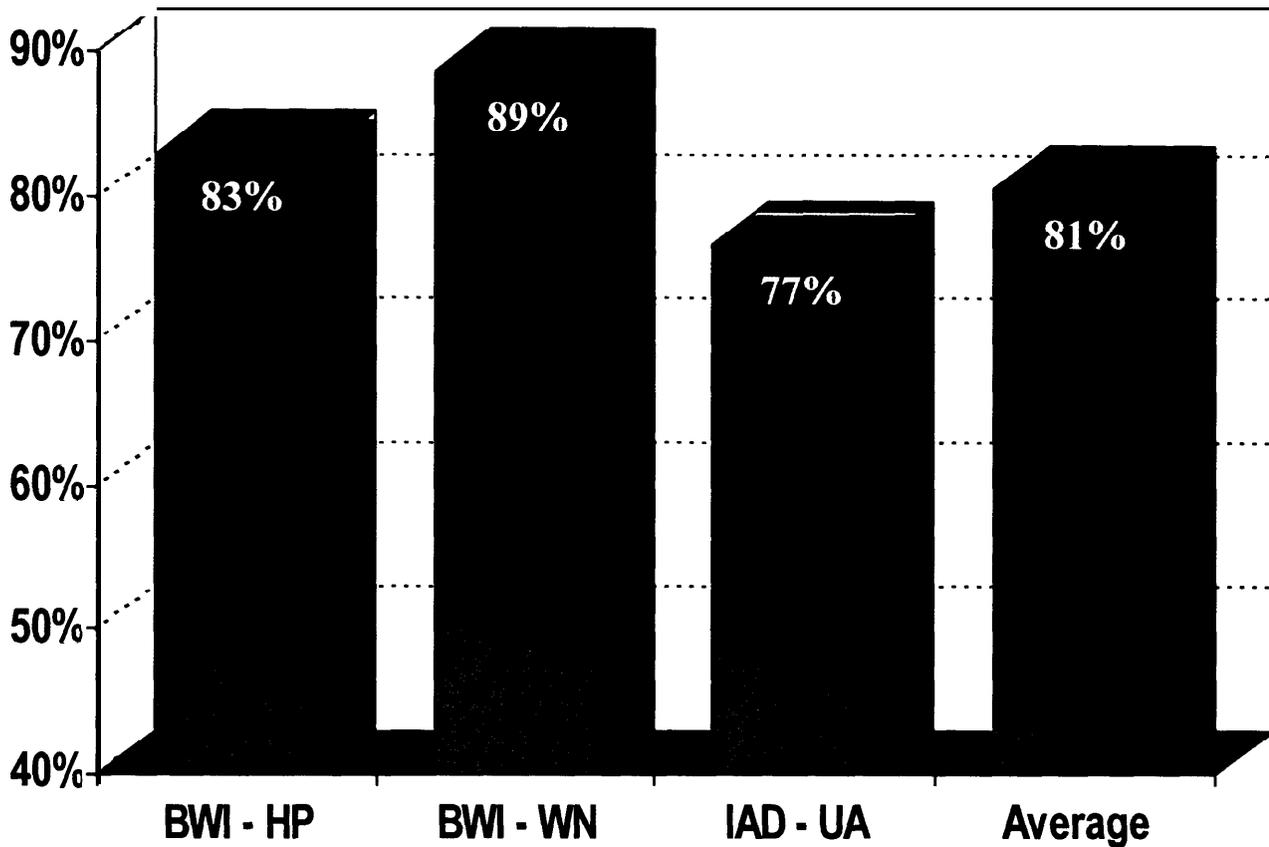
Annual Passengers (000)





LAS- Washington Area *Nonstops* Generate High Load Factors

YE 3Q99 Average load Factor



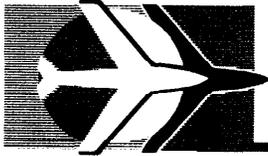


At Least **65%** Of United's **LAS-IAD** **Onboard** Passengers Are Through Or Connecting, Limiting Seats For Local Passengers

United's Local O&D Passengers On
LAS-IAD Nonstop Flights **37,050**

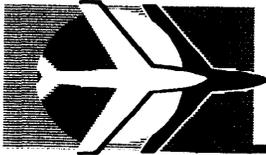
United's Total Onboard Passengers On
LAS-IAD Nonstop Flights **105,908**

United's Local O&D Passenger Share On
LAS-IAD Nonstop Flights **35.0%**



LAS-DCA Connections Involve Circuity Of Up To 53%

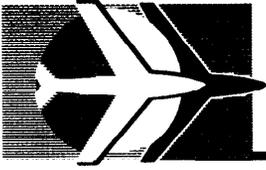
LAS-DCA Via	Mileage	Circuity
Nonstop	2,089	0.0%
CVG	2,089	0.0%
STL	2,091	0.1%
CMH	2,094	0.2%
DEN*	2,105	0.8%
PIT	2,115	1.2%
MDW	2,122	1.6%
ORD	2,127	1.8%
CLE	2,135	2.2%
DTW	2,155	3.2%
MKE	2,158	3.3%
MEM	2,178	4.3%
SLC*	2,219	6.2%



LAS-DCA Connections Involve Circuity Of Up To 53%

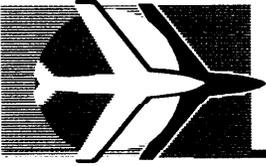
LAS-DCA Via	Mileage	Circuity
MSP	2,231	6.8%
PHX*	2,235	7.0%
CLT	2,247	7.6%
DFW	2,247	7.6%
ATL	2,294	9.8%
PHL	2,295	9.9%
EWR	2,426	16.1%
IAH	2,430	16.3%
LAX*	2,547	21.9%
SFO*	2,856	36.7%
SEA*	3,195	52.9%

*** Assumes an applicant is awarded slots for nonstop service from the indicated city to DCA.**



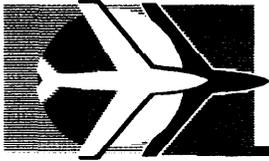
Both *LAS-DCA* Applicants Are “*New Entrants*”

Carrier	DCA Slots		Total
	Current	Requested	
America West	6	10	16
National	0	6	6
Total	6	16	22

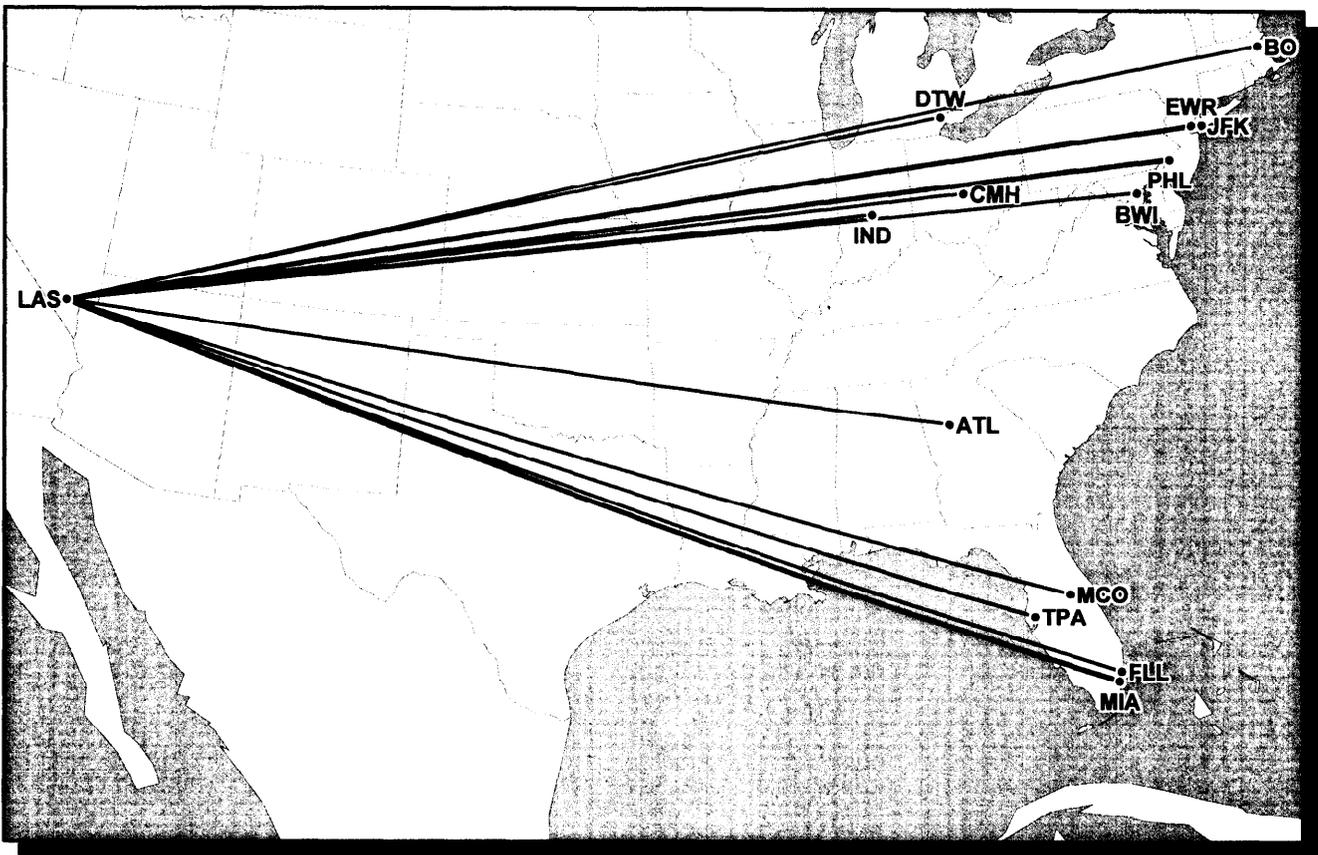


Summary Of *LAS-DCA* Nonstop Service Proposals

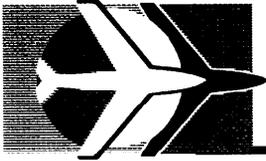
Carrier	Equip.	Seats	Freq.	Dept.	Arr.
<u>LAS-DCA</u>					
America West	B757	190	Daily	00:49	08:14
	B757	190	Daily	13:20	20:55
National	B757	175	Daily	09:30	16:55
	B757	175	Daily	12:40	20:00
	B757	175	Daily	23:45	07:10
<u>DCA-LAS</u>					
America West	B757	190	Daily	08:25	10:30
	B757	190	Daily	20:25	22:34
National	B757	175	Daily	08:10	10:25
	B757	175	Daily	18:10	20:25
	B757	175	Daily	21:00	23:15



The *LAS-DCA* Applicants Are Successful East Coast Operators



- America West
- America West & National



The *LAS-DCA* Applicants Are Successful East Coast Operators

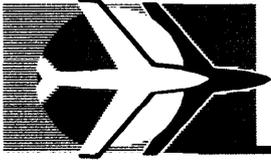
Carrier	Airport	Daily Nonstop Flights
America West	ATL	1
America West	BWI	2
America West	BOS	2
America West	CMH	4
America West	DTW	1
America West	FLL	1
America West	IND	1
America West	MIA	1
National	MIA	2



The *LAS-DCA* Applicants Are Successful East Coast Operators

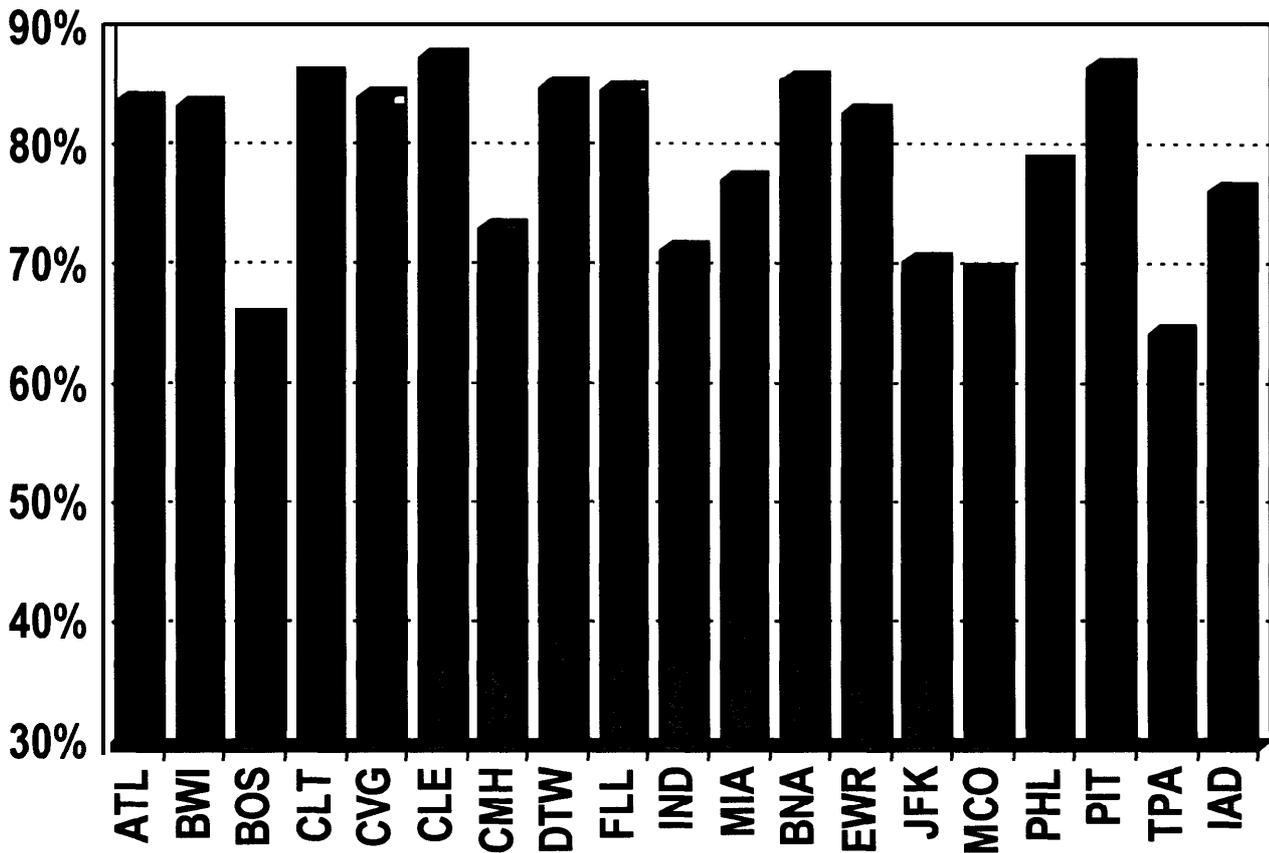
Carrier	Airport	Daily Nonstop Flights
America West	EWR	2
National	EWR	2*
America West	JFK	5
National	JFK	4
America West	MCO	1
America West	PHL	2
National	PHL	2
America West	TPA	1

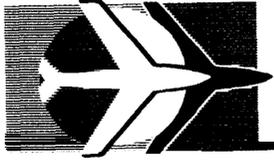
* Service effective July 13, 2000.



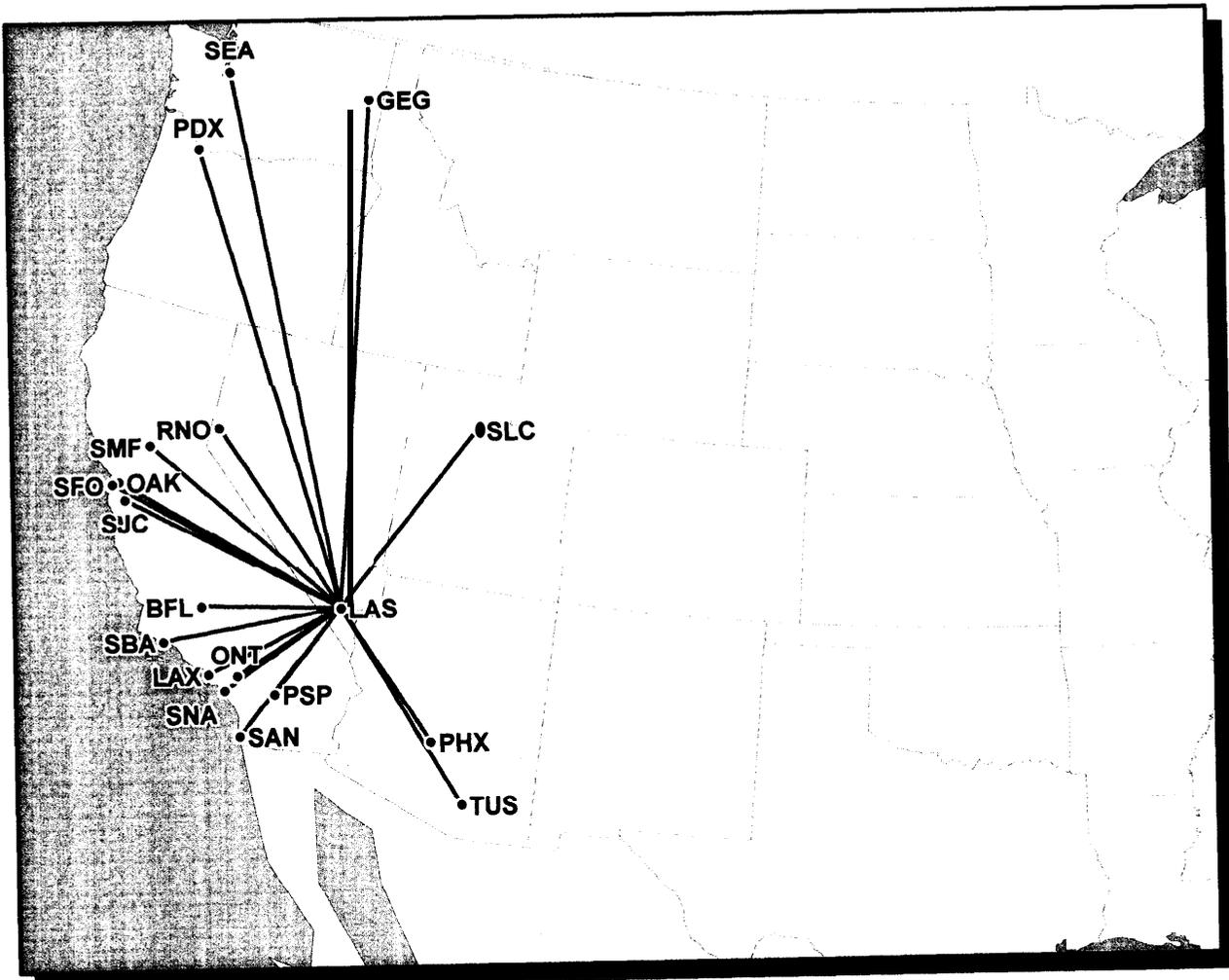
Las Vegas Generates High Loud Factors To The East

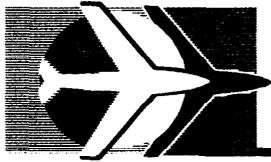
YE 3Q99 Average Load Factor





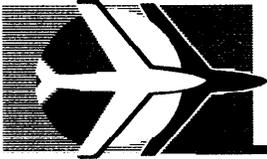
The LAS-DCA Applicants Serve Many Markets Behind LAS





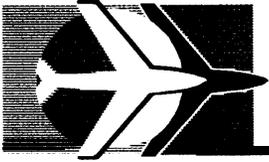
The *LAS-DCA* Applicants Serve Many Markets Behind LAS

Carrier	Airport	Daily Nonstop Flights
America West	BFL	1
America West	LAX	10
National	LAX	6
America West	OAK	1
America West	ONT	1
America West	SNA	9
America West	PSP	1
America West	PDX	1
America West	PHX	19
America West	RNO	1



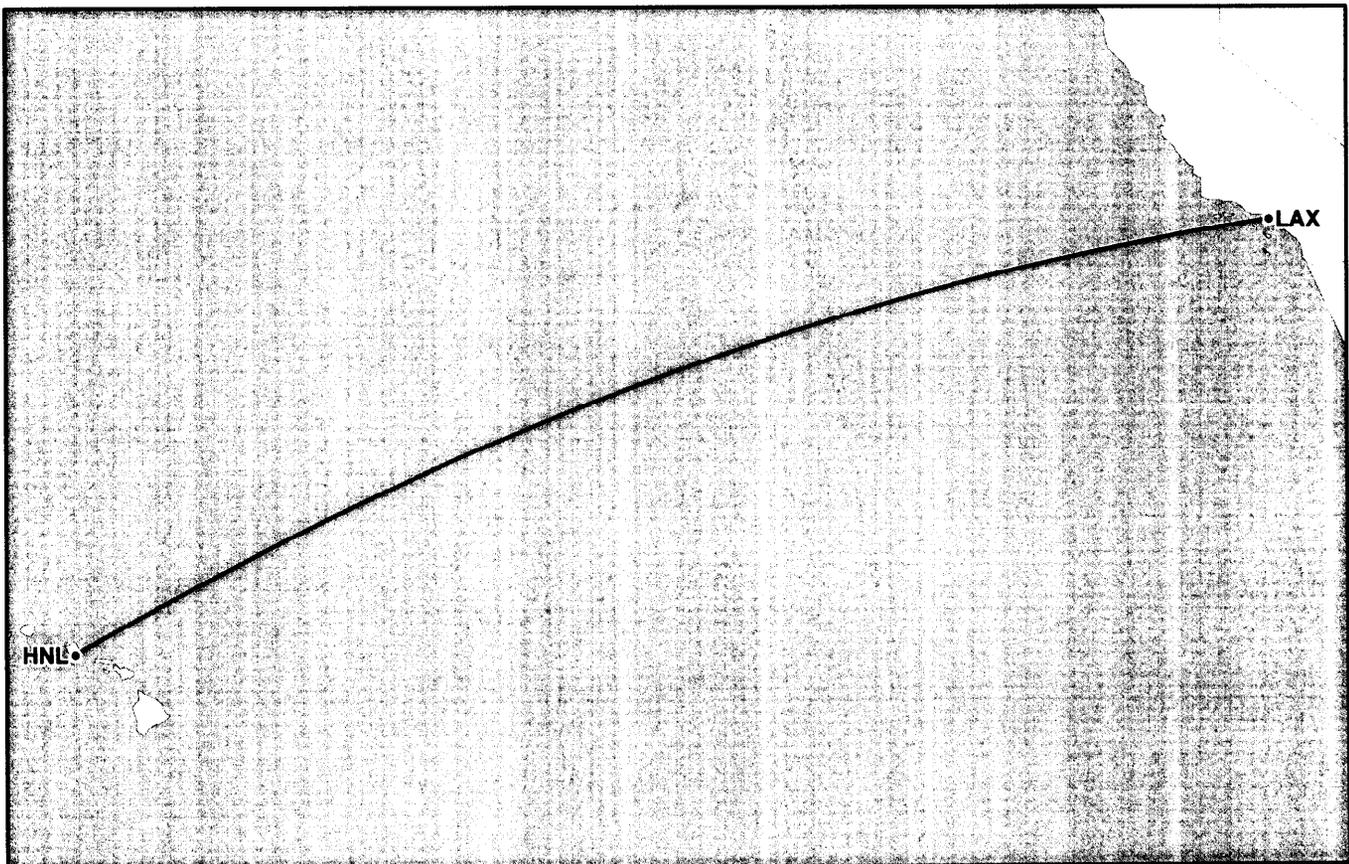
The *LAS-DCA* Applicants Serve Many Markets Behind LAS

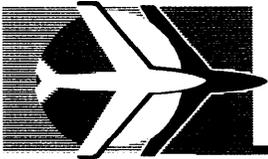
Carrier	Airport	Daily Nonstop Flights
America West	SMF	1
America West	SAN	2
America West	SFO	4
National	SFO	5
America West	SJC	1
America West	SBA	1
America West	SEA	1
America West	GEG	1
America West	TUS	1



If DOT Grunts The Requested Slots To The LAS Applicants, Then The Other Applicant Carriers Offer Little *Incremental Value*

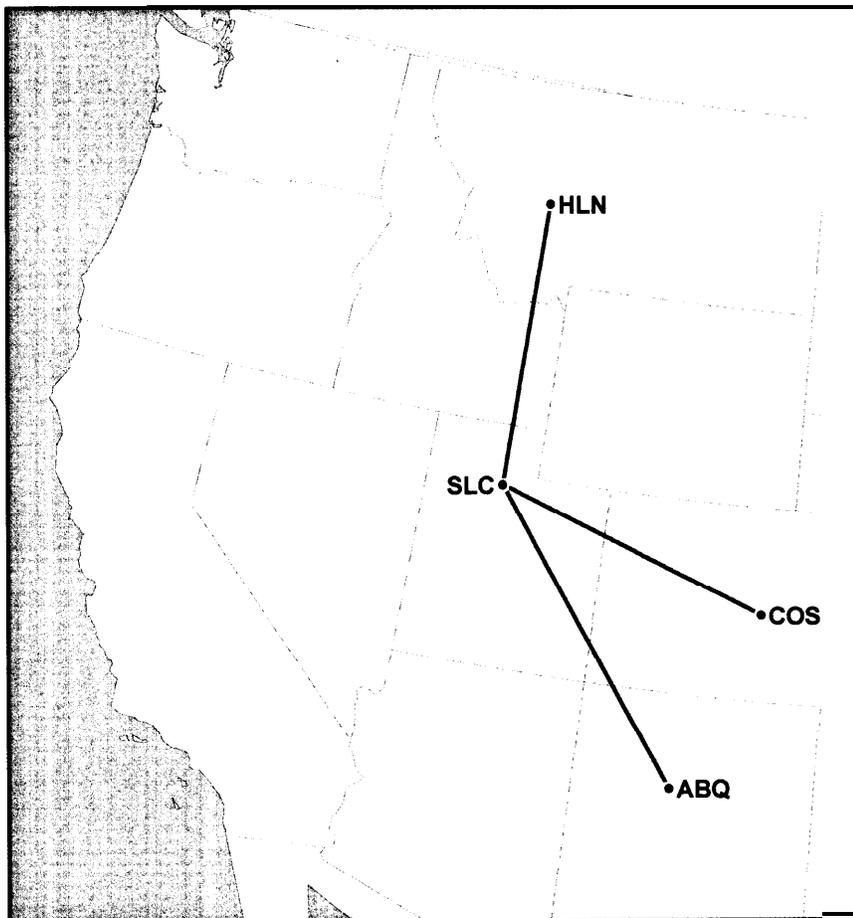
AA/TZ/UA Unique Service From LAX
(Over 30 PDEWs)

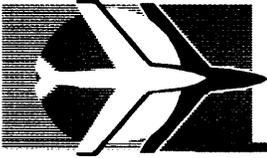




If DOT Grants The Requested Slots To The LAS Applicants, Then The Other Applicant Carriers Offer *Little Incremental Value*

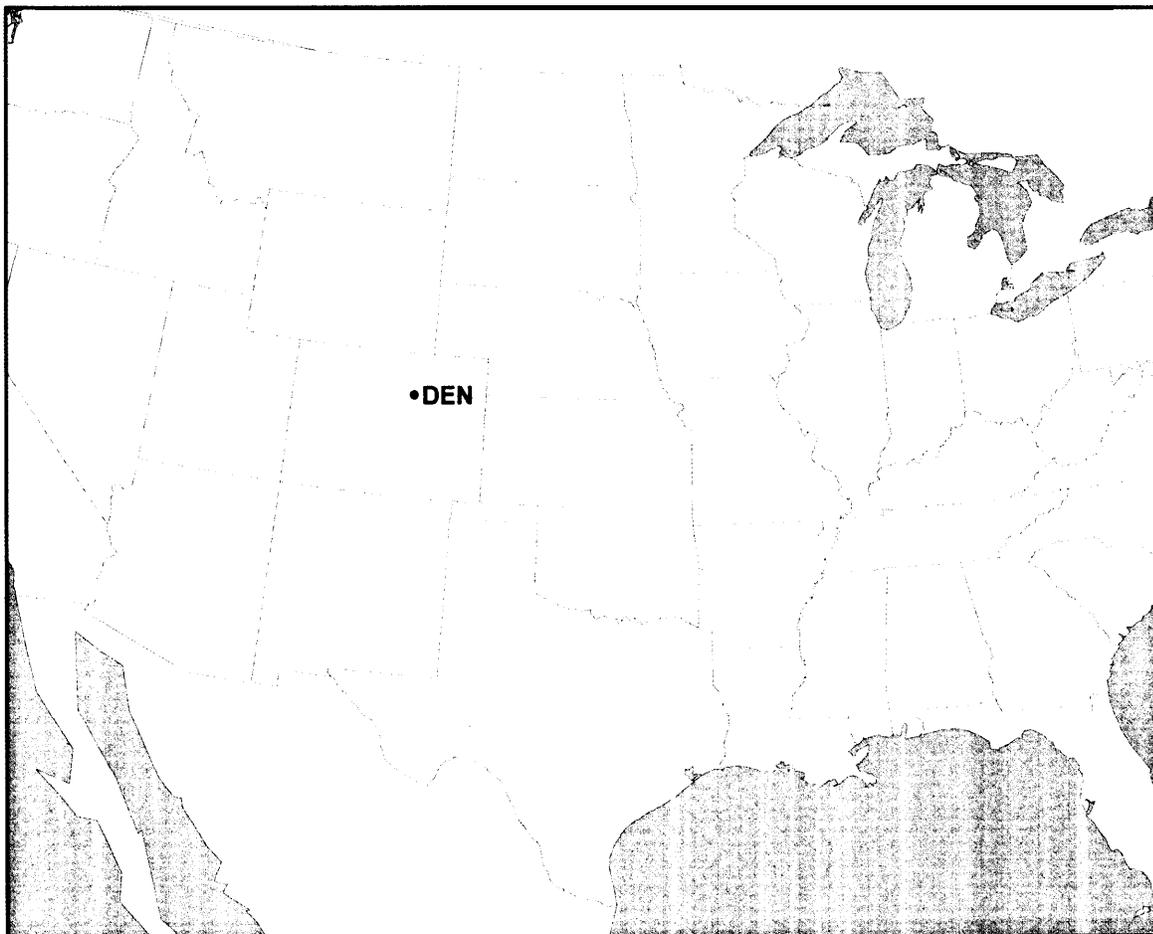
**DL Unique Service From SLC
(Over 30 PDEWs)**

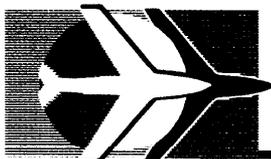




If DOT *Grants* The Requested Slots To The LAS Applicants, Then The Other Applicant Carriers Offer *Little* Incremental Value

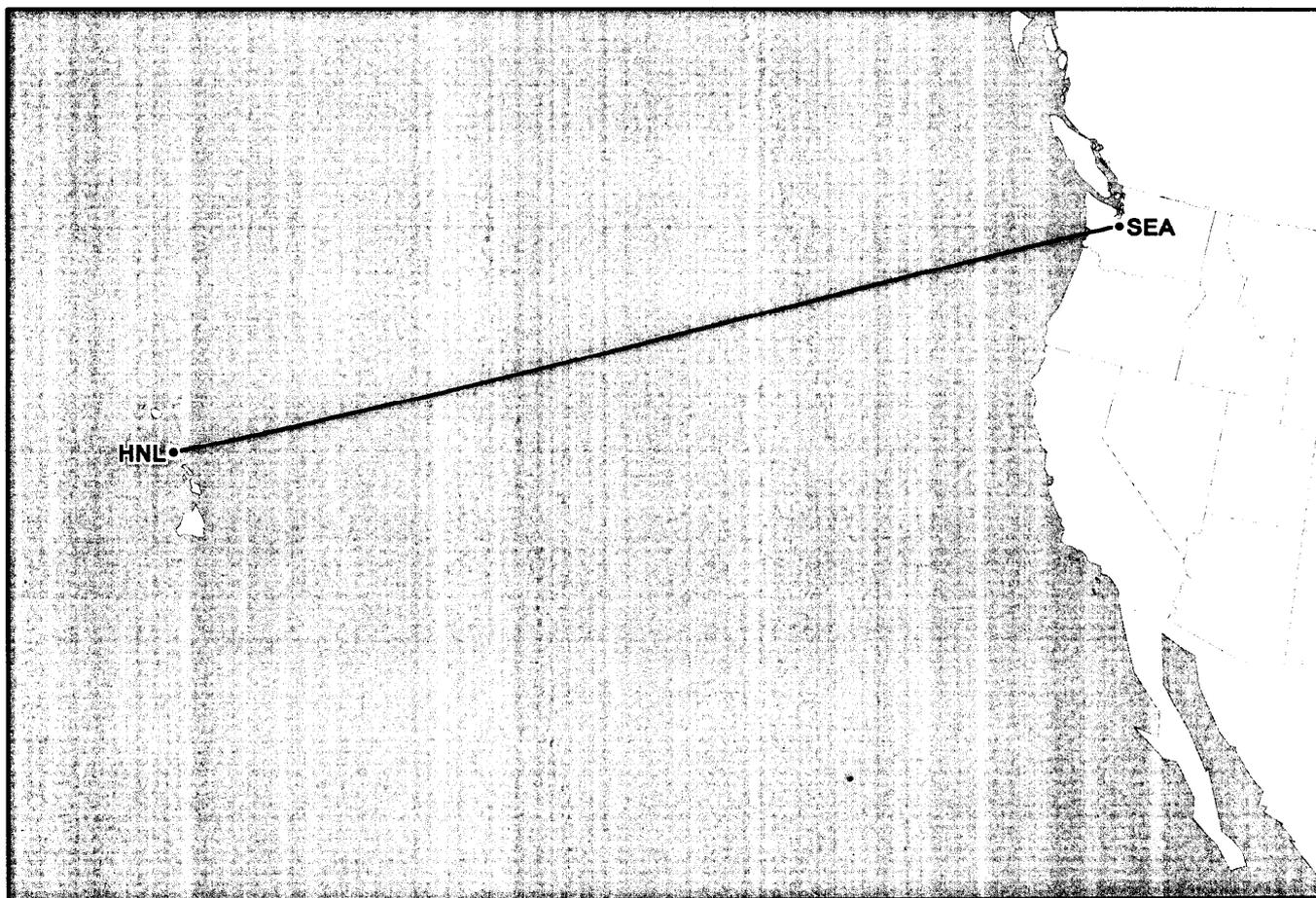
F9 Unique Service From DEN
(Over 30 PDEWs)

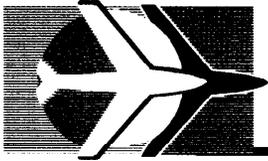




If DOT Grunts *The* Requested Slots To The LAS Applicants, Then The Other *Applicant* Carriers Offer little *Incremental* Value

NW Unique Service From SEA
(Over 30 PDEWs)

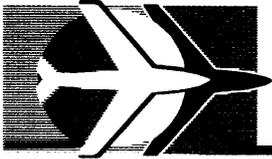




If DOT Grunts The Requested Slots To The *LAS* Applicants, Then The Other *Applicant* Carriers Offer **little Incremental Value**

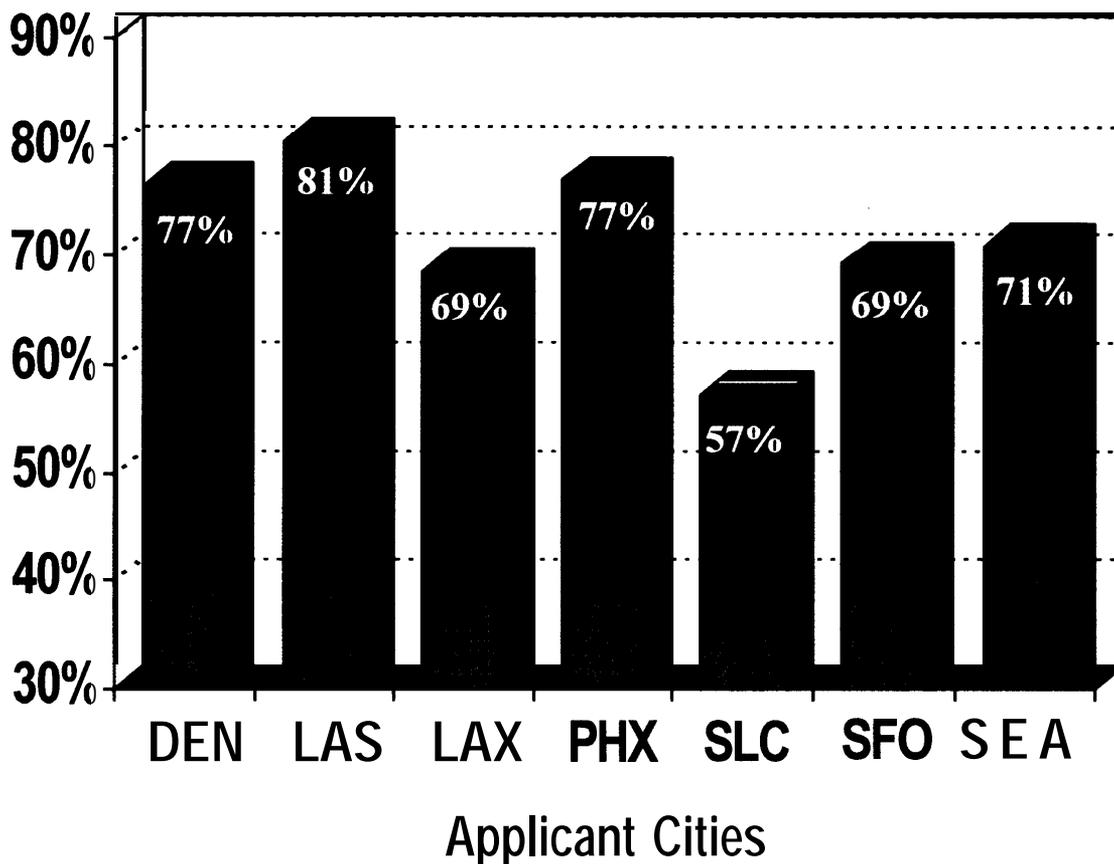
TZ Unique Service From SFO
(Over 30 PDEWs)





LAS- Washington Area *Nonstops* Had The Highest loud *Factors*

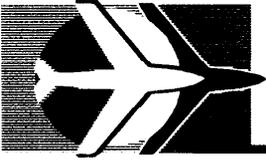
YE 3Q99 Average Load Factor





Siegfried & Roy - World Class Entertainment

Series **400** Exhibits

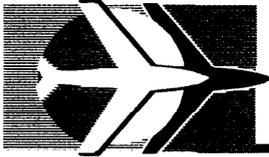


Introduction To Series 400 Exhibits

Las Vegas **McCarran** International Airport is the gateway for domestic and international passengers to “The Entertainment Capital of the World.” The airport currently has nearly 100 gates available for airline use, and four air carrier runways including the second longest in the country at 14,505 feet (Exhibits LAS-401 to LAS-403).

McCarran International Airport recently opened the first half of its “D” satellite terminal with 26 gates, with land available to double the size of that terminal when demand warrants it. There is also a separate international and charter terminal with full customs and immigration stations (Exhibits LAS-404 and LAS-405).

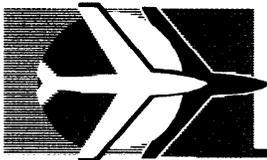
Future expansion plans call for the phased addition of more gates to the “D” terminal, more gates at the international terminal and a consolidated car rental facility including a three-level garage (Exhibit LAS-406).



Las Vegas McCarran International Airport



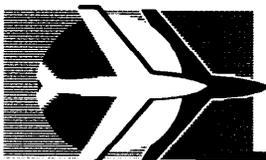
Gateway to *the* Entertainment Capital of the World



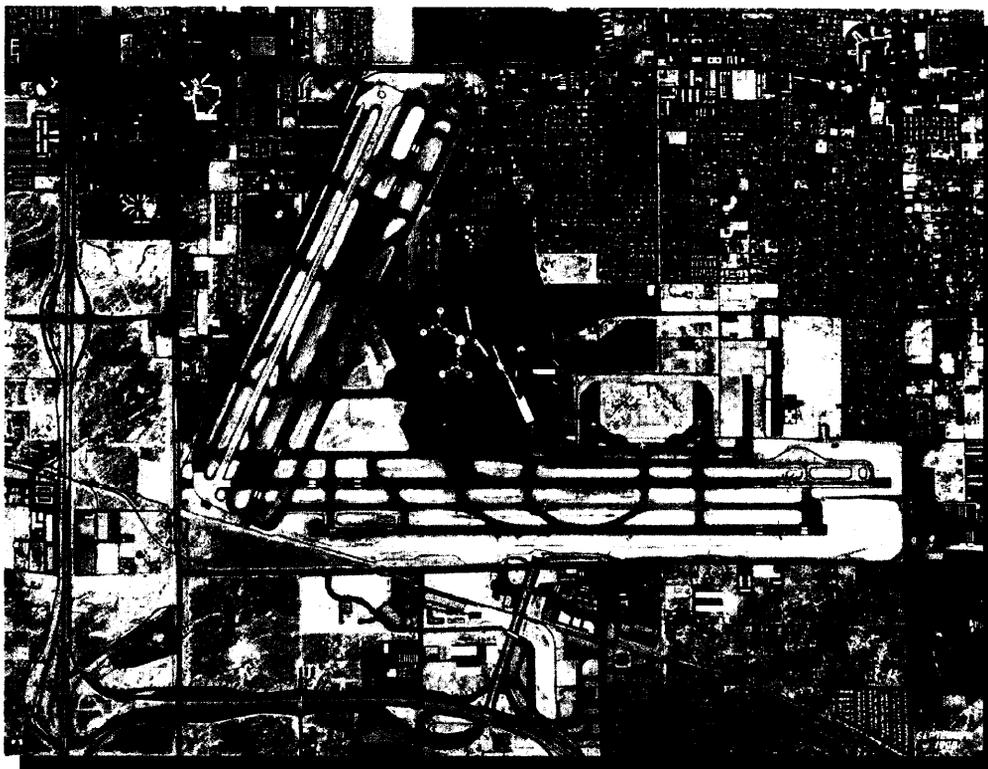
Key Features Of *McCarran* *International* Airport



Number of Gates	93
Retail Space (ft²)	127,027
Baggage Carousels	20
Number of Parking Spaces	12,640



facilities: Runway Lengths



7L/25R

14,505 feet 4,350 meters

7R/25L

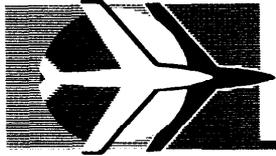
10,525 feet 3,160 meters

1R/19L

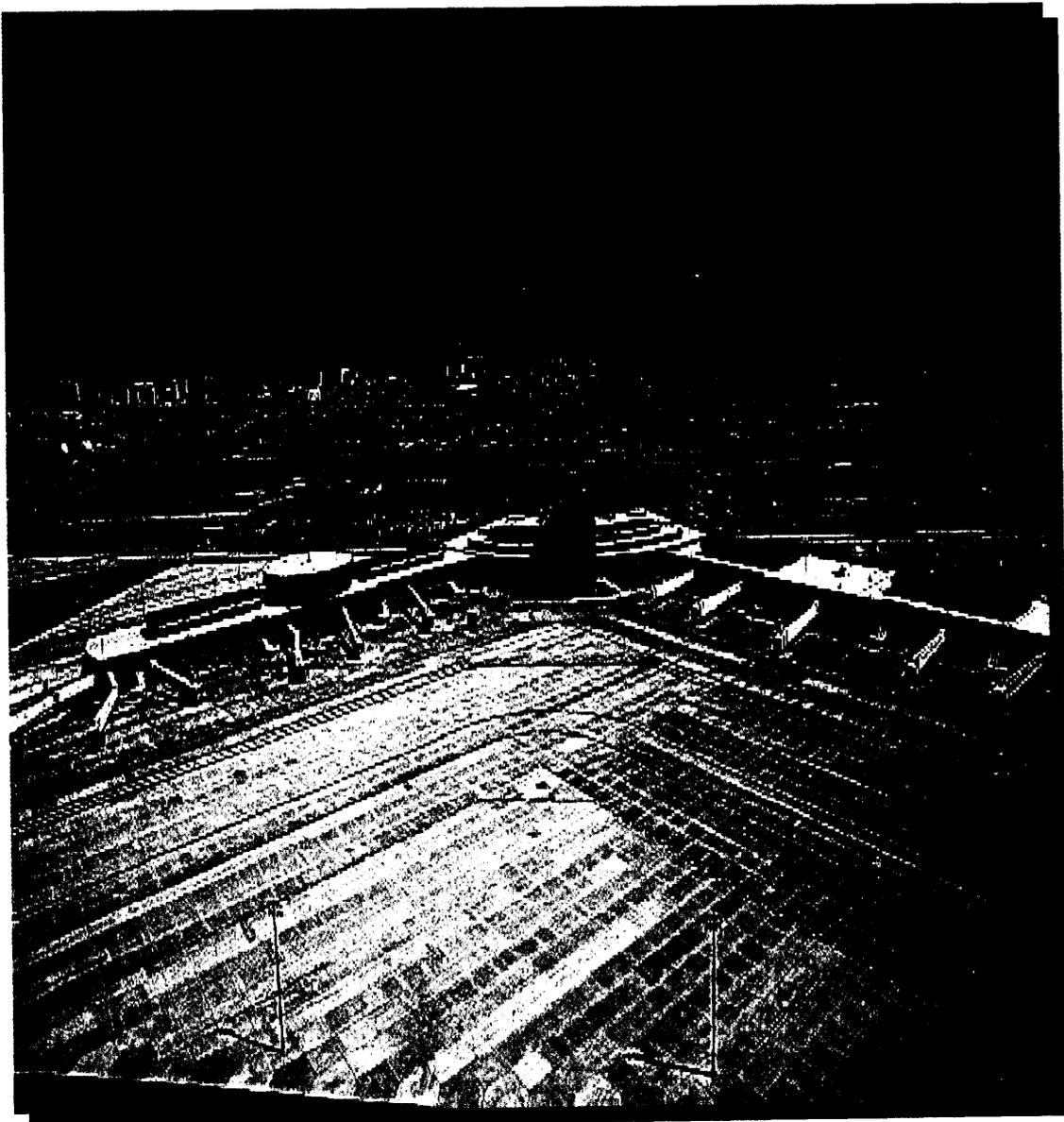
9,770 feet 2,930 meters

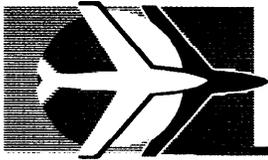
1L/19R

9,770 feet 2,930 meters

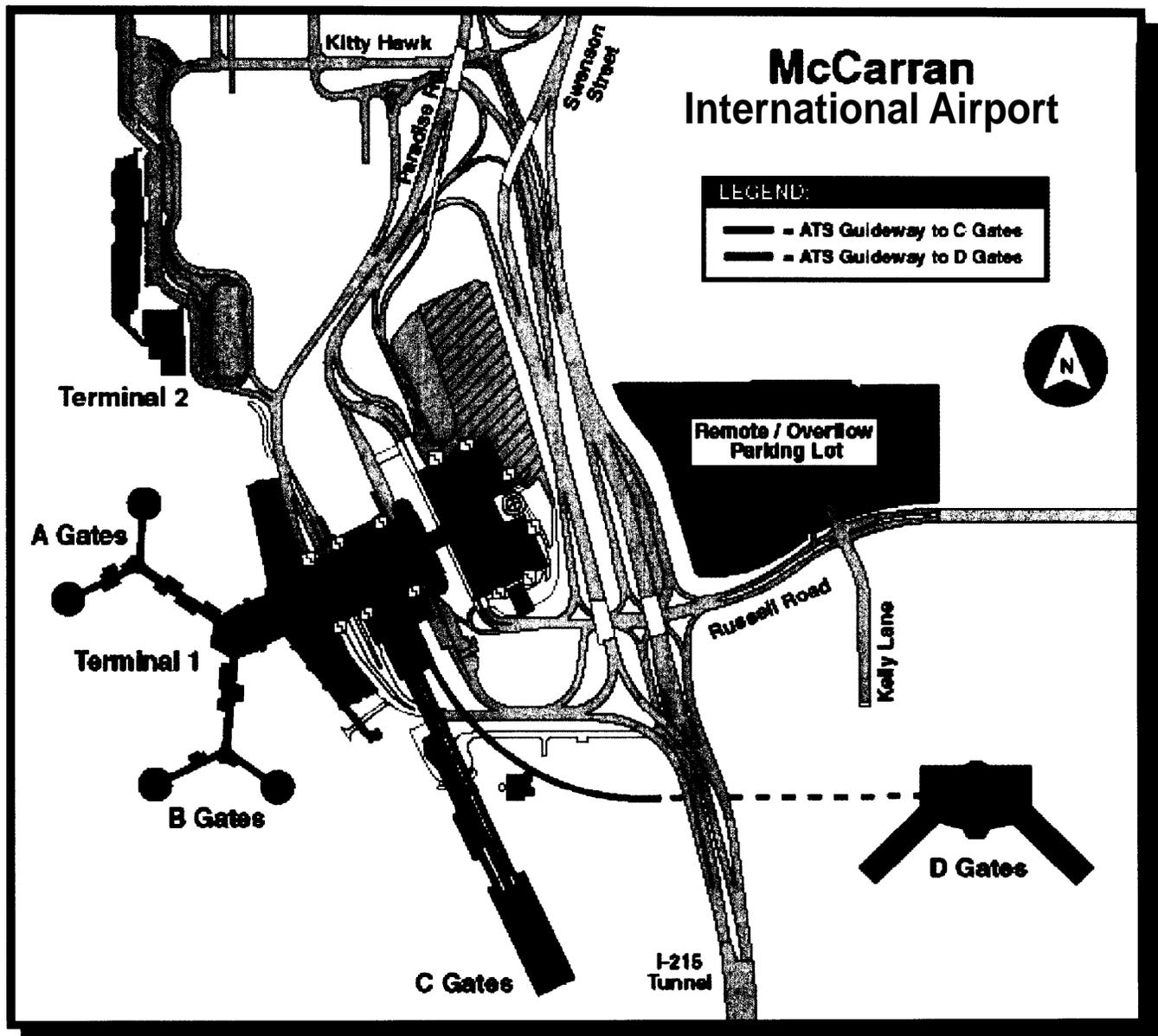


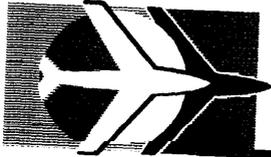
Facilities: Recently Opened New Terminal



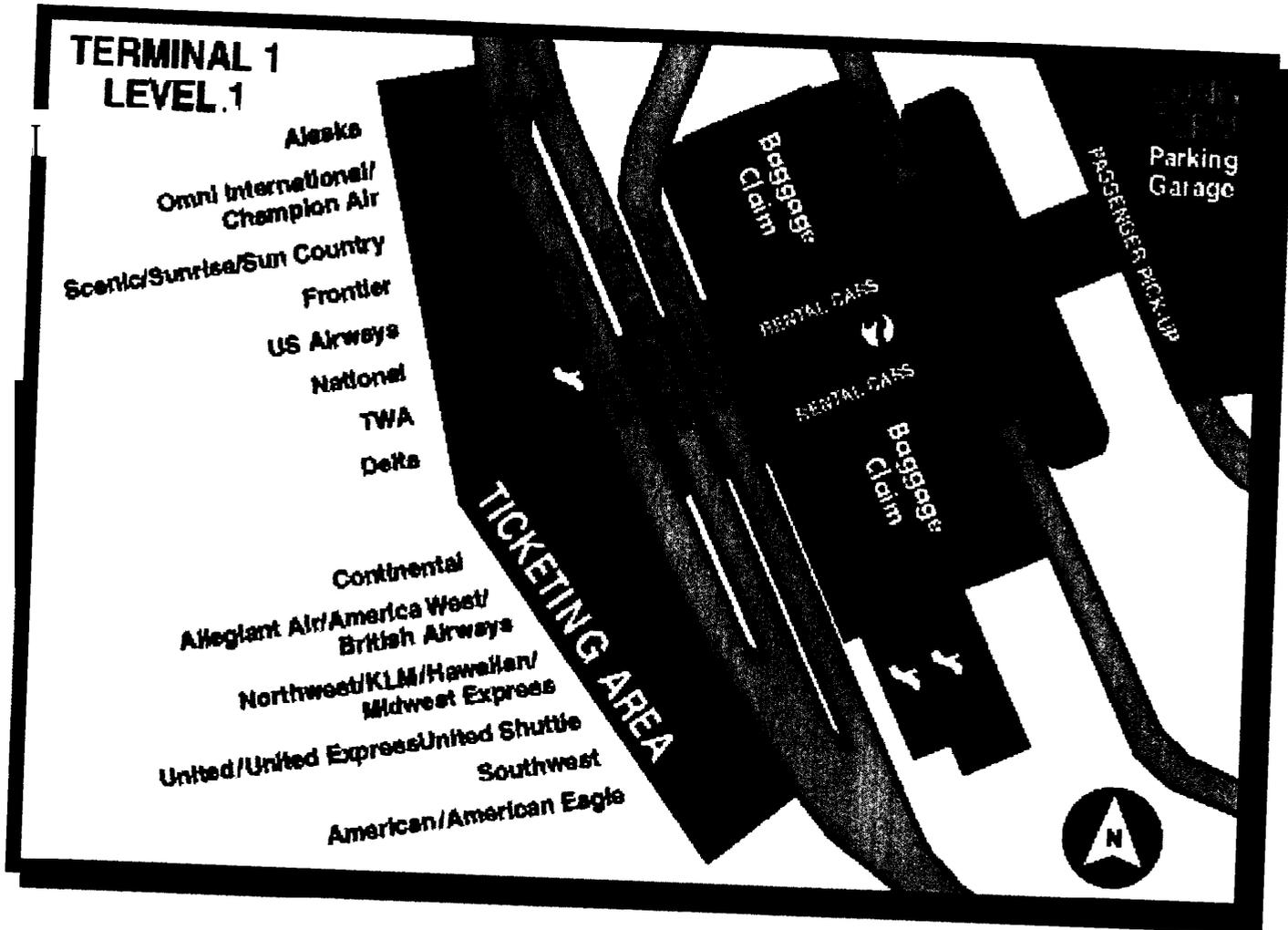


McCarran International Airport Layout



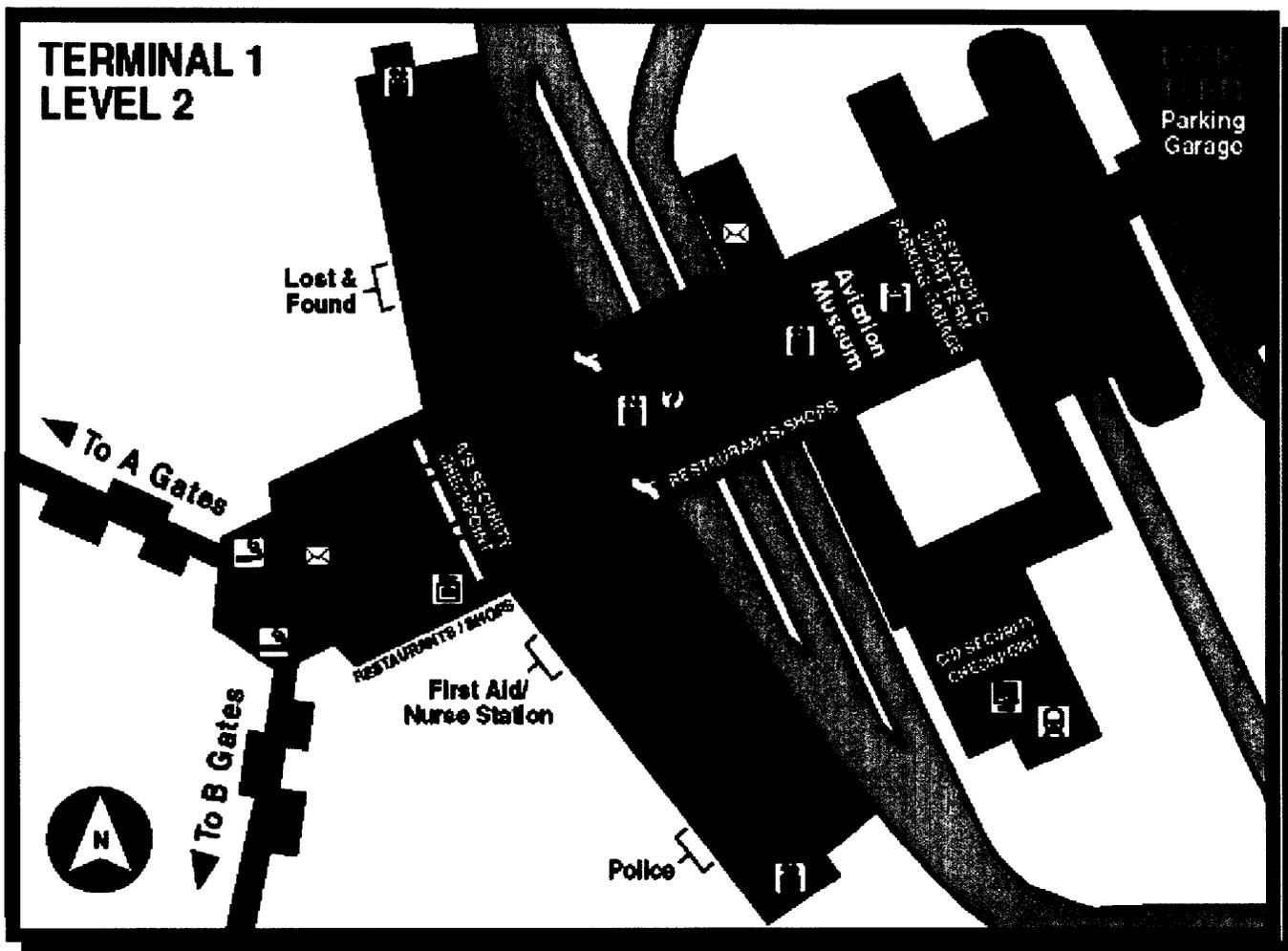


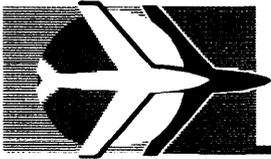
McCarran International Airport Layout



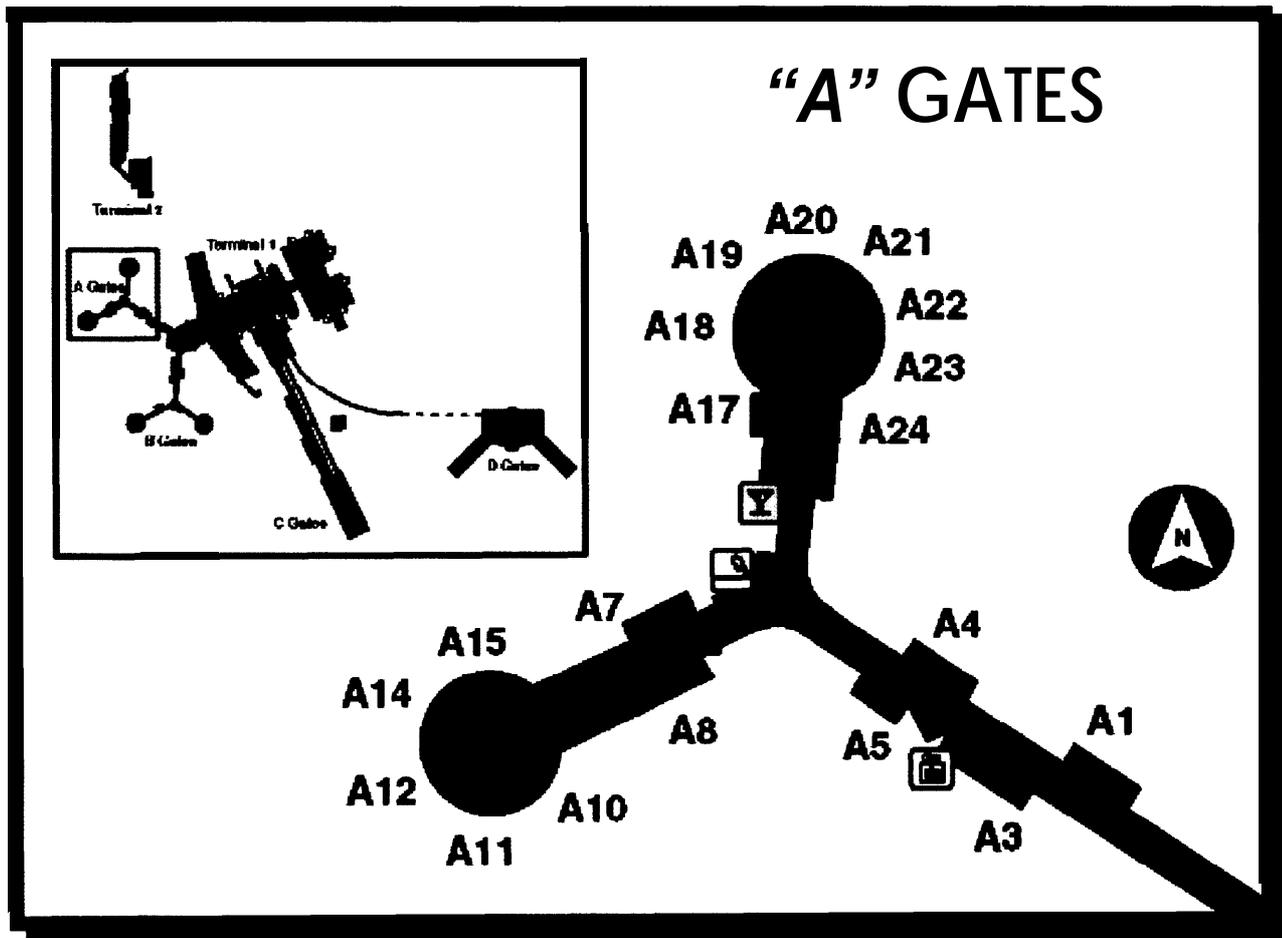


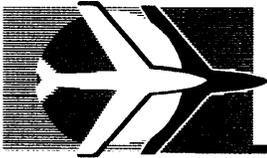
McCarran International Airport Layout



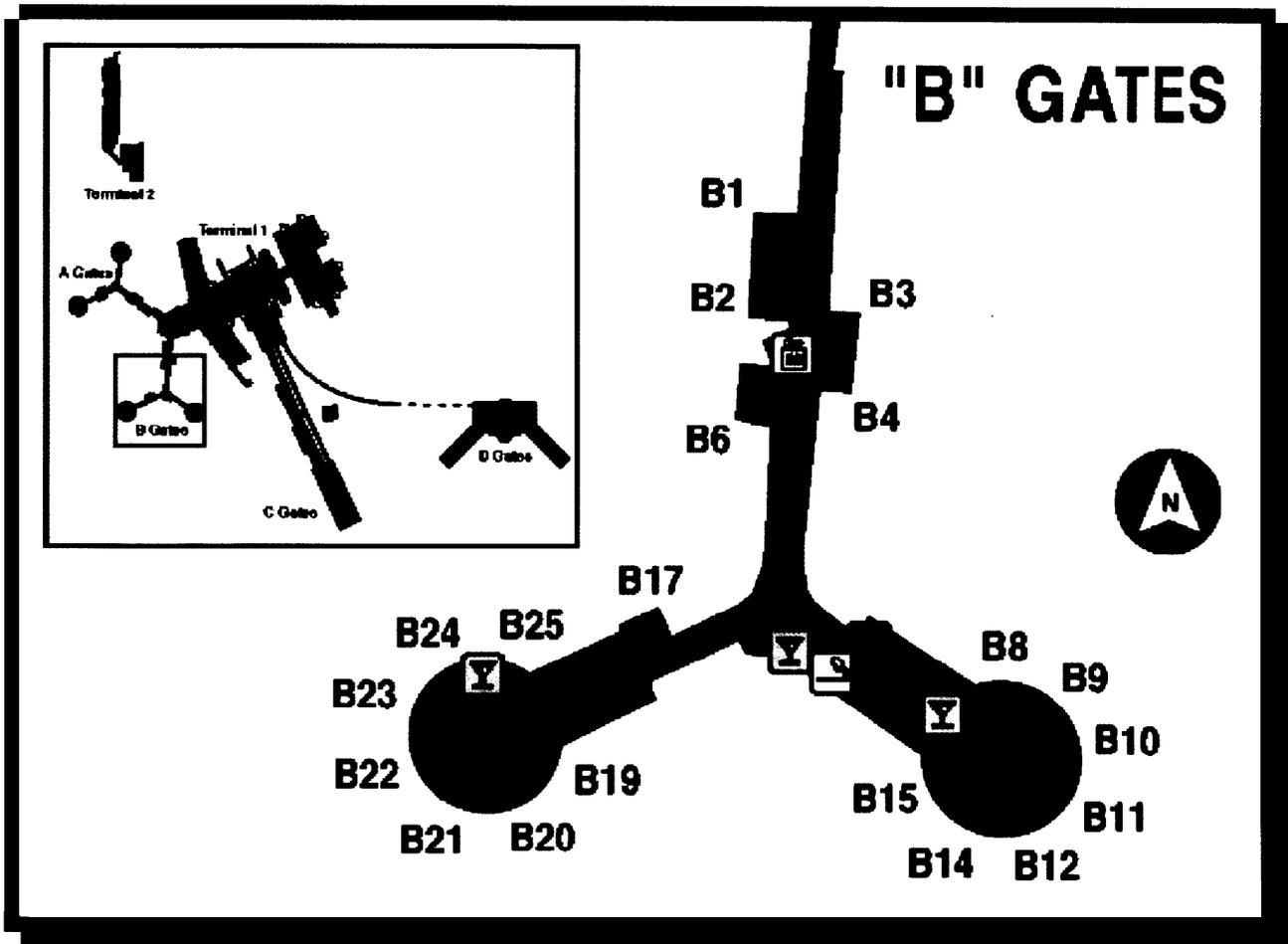


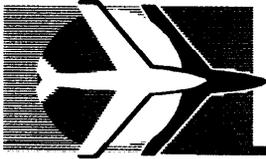
McCarran International Airport Layout



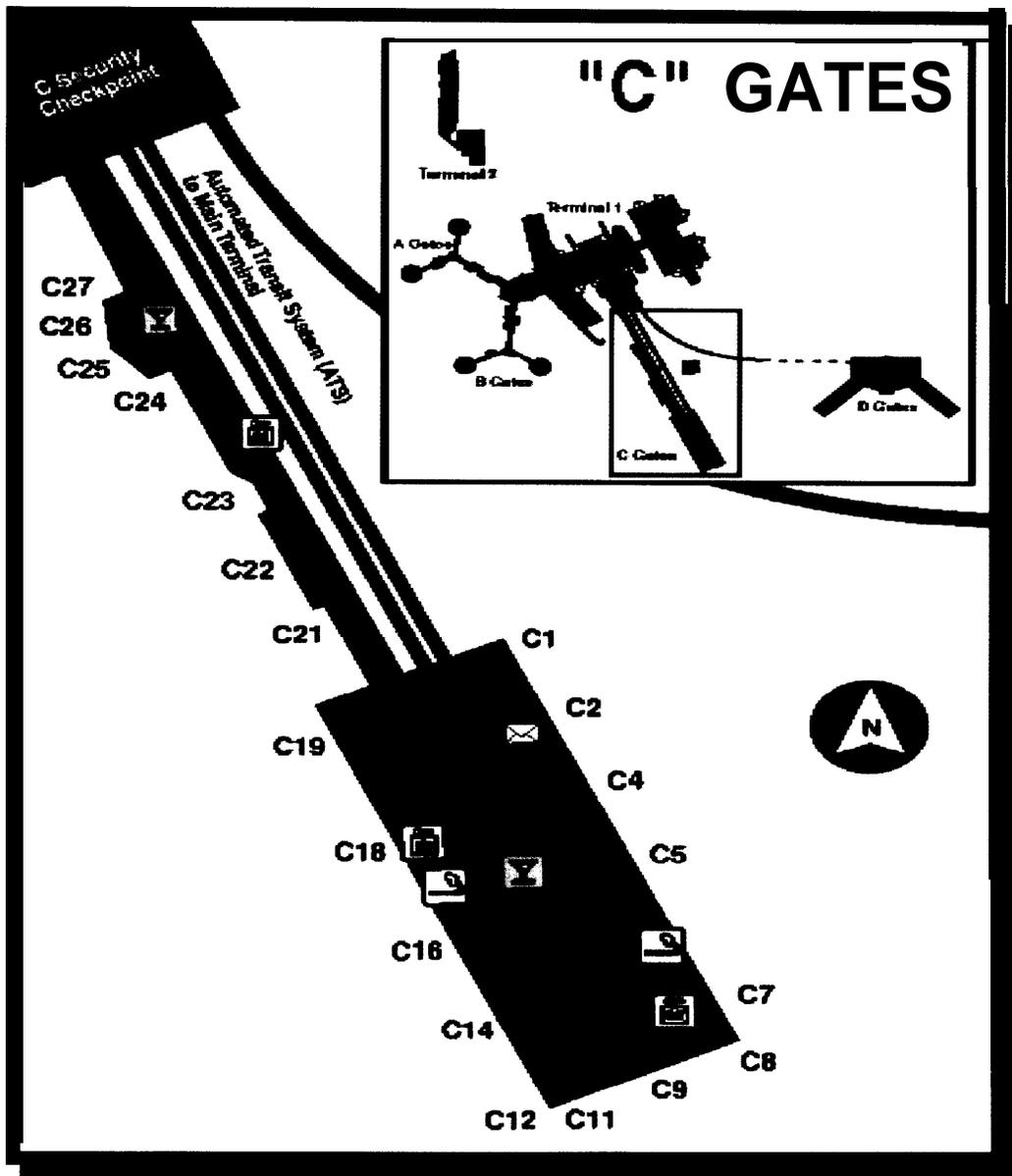


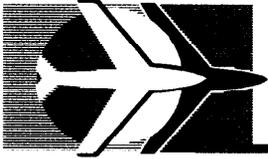
McCarran International Airport layout



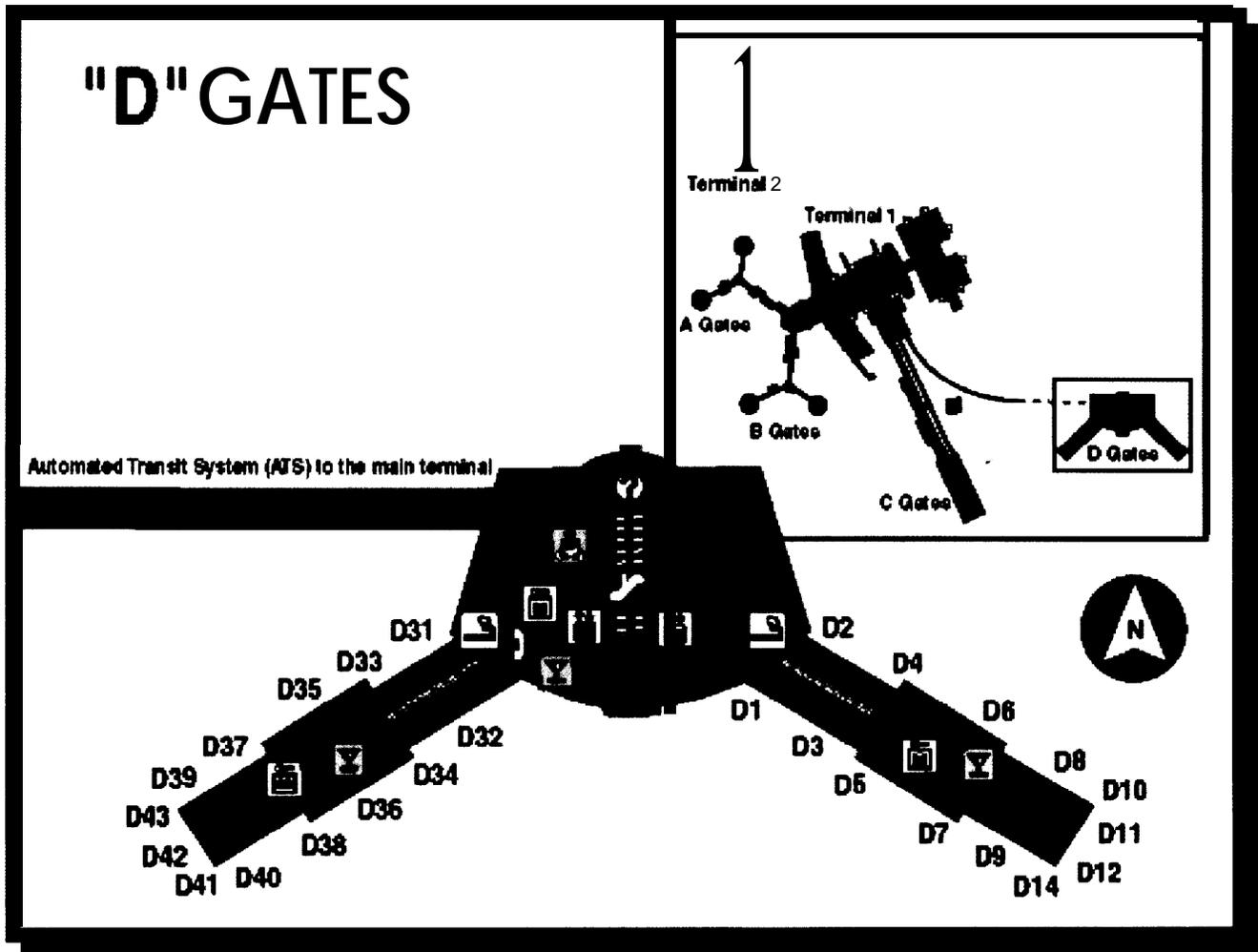


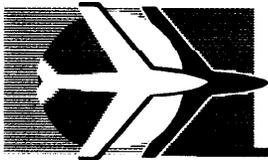
McCarran International Airport layout



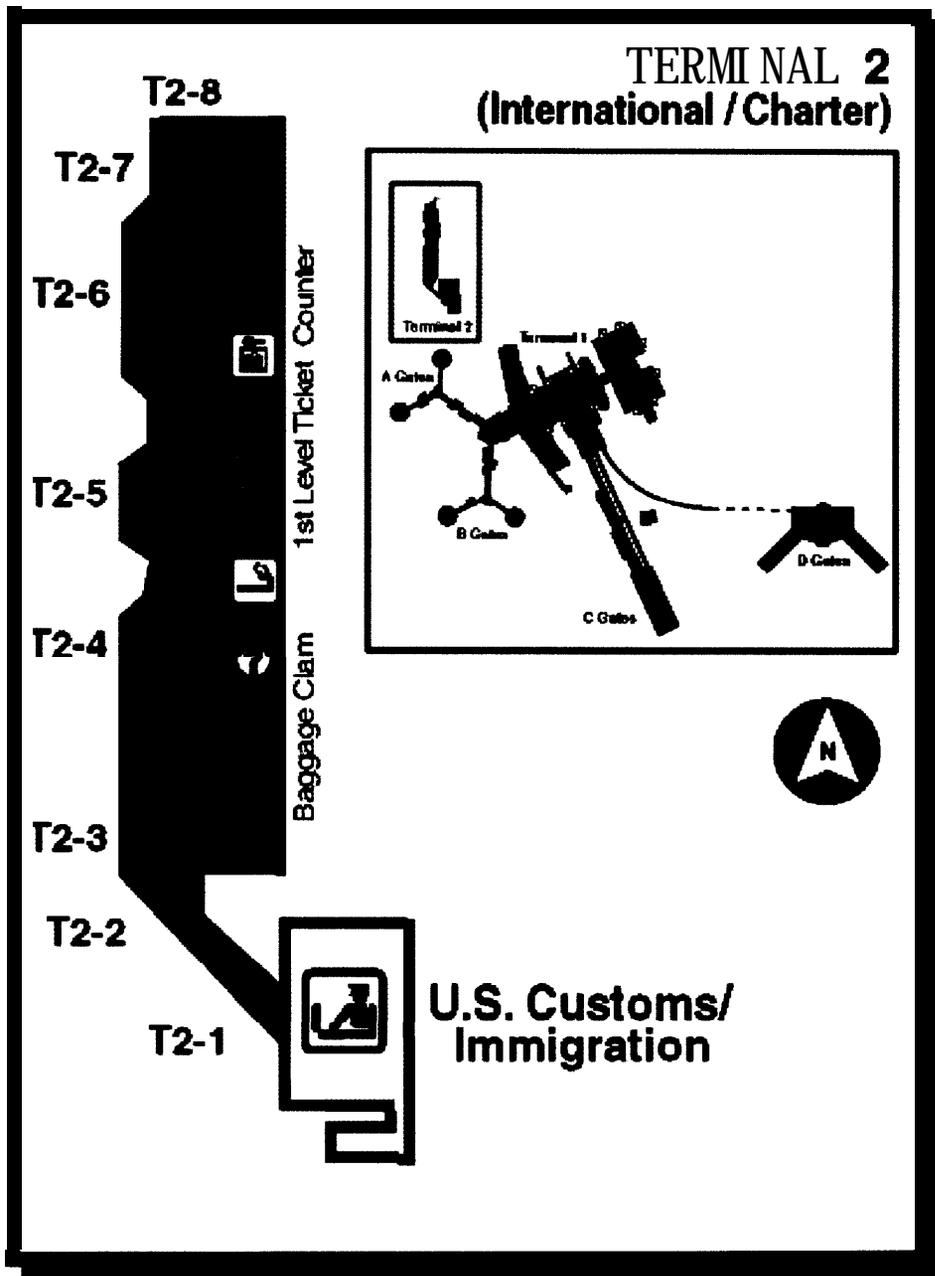


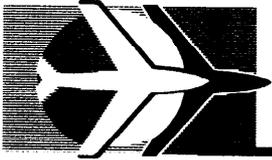
McCarran International Airport layout





McCarran International Airport Layout





Facilities: Future Expansion

Expansion of D Satellite

@Addition of 9 New Gates

- . New Automated People Mover**

New Consolidated Car Rental Facility

- . Covering 65 Acres**
- . Includes 3 Level Garage**

International Terminal

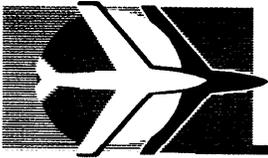
- Addition of 8 New Gates**



Spectacular Resorts By Day...

And Night!

Series **500** Exhibits



letters Of Support

Letters Of Support For LAS-DCA Nonstop Service Were Received From The Following 10 Individuals:

- . **Senator Richard Bryan**
- . **Senator Harry Reid**
- . **Congresswoman Shelley Berkley**
- . **Congressman Jim Gibbons**
- . **Bruce L. Woodbury, Chairman, Clark County Board of County Commissioners**
- . **Oscar B. Goodman, Mayor, City of Las Vegas**
- . **Michael L. Montandon, Mayor, City of North Las Vegas**
- . **James B. Gibson, Mayor, City of Henderson**
- . **A. Somer Hollingsworth, President & CEO, Nevada Development Authority**
- . **Frank D. Pankratz, Sr. VP & General Manager, Del Webb's Sun City Anthem**

RICHARD BRYAN
NEVADA

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URBAN AFFAIRS

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TRANSPORTATION
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United States Senate

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May 18, 2000

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SUITE 1110
LAS VEGAS, NV 89101
(702) 388-6605

600 EAST WILLIAM STREET
SUITE 304
CARBON CITY, NV 89701
(775) 895-9111

The Honorable Rodney E. Slater
Secretary of Transportation
U.S. Department of Transportation
400 7th Street, SW, Room 10200
Washington, DC 20590

Dear Secretary Slater:

Recently, President Clinton signed the "Wendell H. Ford Aviation Investment and Reform Act for the 21st Century" (AIR-21) into law. I am writing to request that you award at least four slots for non-stop service between Las Vegas McCarran International Airport and Ronald Reagan Washington National Airport (DCA) pursuant to Section 231 of this Act.

As you know.. the 1,250 mile DCA "perimeter rule" was imposed on one of our nation's most popular airports, Washington National, in 1986 to foster the growth of flights at the then newly established Dulles International Airport. While considering this bill in the Commerce Committee, it was apparent that this rule, having served its useful purpose, had become restrictive and no longer necessary to promote the growth of surrounding airports. Section 231 amends this restrictive rule allowing you to grant 12 new slots beyond the perimeter.

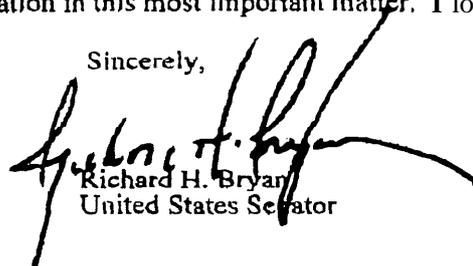
As you are aware, the guidelines set forth under AIR-21 specify a set of criteria for which slot selection determinations are to be made. As outlined in the legislation, the reasoning for having a set of criteria is to promote air transportation in a way that would (1) increase competition by new entrant air carriers or in multiple markets and (2) provide air transportation with domestic network benefits in areas beyond the perimeter. A carrier(s) providing non-stop service between Las Vegas and DCA should receive at least four of the 12 new slots (two daily round trip flights) in order to fulfill the intent and criteria set forth in the legislation .

Both National Airlines and America West have applied to provide non-stop service between Las Vegas McCarran International Airport and DCA, and both strongly satisfy the criteria as previously outlined. As new entrants, both would increase competition in multiple markets by providing this service. Regarding network benefits, Las Vegas serves multiple communities that would benefit from non-stop service between McCarran International Airport and DCA. Specifically, they would receive enhanced one stop and single connection services via Las Vegas on National Airlines. America West, or one or more of the other carriers that Serve McCarran.

Las Vegas is uniquely qualified for the criteria set forth in AIR-21 for flights outside the perimeter in a way that no other city can match. Again, I urge favorable consideration of the four new slots to a carrier(s) proposing to provide non-stop service between DCA and Las Vegas. --

Thank you for your consideration in this most important matter. I look forward to your response.

Sincerely,



Richard H. Bryan
United States Senator

RHB/br

United States Senate

WASHINGTON, DC 20510-2803

May 11, 2000

The Honorable Rodney E. Slater
U.S. Department of Transportation
400 7th Street, S.W., Room 10200
Washington, D.C. 20590

Dear Mt. **Secretary**:

I am requesting that you award at least **four slots** for non-stop service between Las Vegas McCarran International Airport and Ronald Reagan Washington National Airport (DCA) pursuant to Section 231 of the "Wendell H. Ford Aviation Investment and Reform Act for the 21st Century" (AIR-21), P.L. 106-181.

As you know, **Section 231** amends the 1,250 DCA "perimeter rule" by directing you to grant 12 new slots for service beyond this perimeter. A carrier(s) serving the Las Vegas community should receive at least four of these 12 new slots (two daily round trip flights), principally because it would strongly satisfy the primary criteria for new service as set forth under AIR-21. Specifically, non-stop service between Las Vegas and DCA would (1) increase competition by new entrant air carriers or in multiple markets and (2) provide air transportation with domestic network benefits in areas beyond the perimeter.

Both National Airlines and American West want to provide non-stop service between Las Vegas McCarran International Airport and DCA. Both airlines are also new entrants. As such, they would increase competition by new entrant airlines and in multiple markets by providing this service.

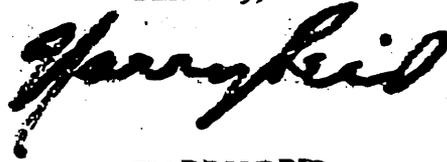
Multiple communities beyond Las Vegas of varying sizes and locations would also benefit from non-stop service between McCarran International Airport and DCA. Specifically, they would receive enhanced one stop and single Connection services via Las Vegas on National Airlines, America West, or one or more of the other carriers that serve McCarran.

No other community outside the 1,250-mile perimeter rule would satisfy the AIR-21 requirements in such a positive fashion as Las Vegas. Consequently, I again urge you to award four new slots to a carrier(s) proposing to provide non-stop service between DCA and McCarran International Airport-

Thank you for your consideration in this most important matter. I look forward to your response.

With all best wishes,

Sincerely,

A handwritten signature in black ink, appearing to read "Harry Reid". The signature is written in a cursive, slightly slanted style.

HARRY REID
United States Senator

HR:hkh

SHELLEY BERKLEY
1ST DISTRICT, NEVADA

1505 LONGWORTH BUILDING
WASHINGTON, DC 20515
202-225-5965

2340 PASEO DEL PRADO
SUITE 0106
LAS VEGAS, NEVADA 89102
702-220-9823

Congress of the United States
House of Representatives
Washington, DC 20515-2801

TRANSPORTATION
AND INFRASTRUCTURE
VETERANS' AFFAIRS
SMALL BUSINESS
CAUCUS TASK FORCES:
EDUCATION
HEALTHCARE

May 5, 2000

The Honorable Rodney E. Slater
Secretary
Department of Transportation
400 7th Street Southwest
Washington, D.C. 20590-0003

Dear Secretary Slater,

I am requesting that you award slots for non-stop service between Las Vegas McCarran International Airport and Ronald Reagan Washington National Airport (DCA) pursuant to Section 231 of the "Wendell H. Ford Aviation Investment and Reform Act for the 21st Century" (AIR-21), P-L. 106-181.

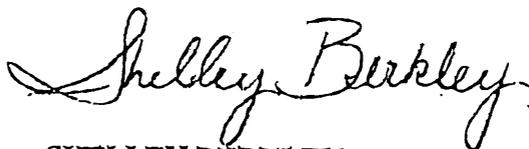
As you know, Section 231 amends the 1,250-mile DCA "perimeter rule" by directing you to grant 12 new slots for service beyond this perimeter. A carrier(s) serving the Las Vegas community should receive at least four of these 12 new slots (two daily round trip flights), principally because it would strongly satisfy the primary criteria for new Service as set forth under AIR-21. Specifically, non-stop service between Las Vegas and DCA would (1) increase competition by new entrant air carriers in multiple markets, and (2) provide air transportation with domestic network benefits in areas beyond the perimeter.

Both National Airlines and America West Airlines want to provide non-stop service between Las Vegas McCarran International Airport and DCA. Both airlines are also new entrants. As such, they would increase competition by new entrant airlines and in multiple markets by providing this service.

Multiple communities beyond Las Vegas of varying sizes and locations would also benefit from non-stop service between McCarran International Airport and DCA. Specifically, they would receive enhanced one stop and single connection services via Las Vegas on National Airlines, America West, or one or more of the other carriers that serve McCarran.

No other community outside the 1,250-mile perimeter rule would satisfy the AIR-21 requirements in such a positive fashion as Las Vegas. Consequently, I again urge you to award these slots to a carrier(s) proposing to provide non-stop service between DCA and McCarran International Airport. Thank you for your consideration in this most important matter. I look forward to your response.

Sincerely,



SHELLEY BERKLEY
Member of Congress

JIM GIBBONS
2ND DISTRICT, NEVADA



SELECT **COMMITTEE** ON **INTELLIGENCE**
SUBCOMMITTEE ON TECHNICAL AND
TACTICAL INTELLIGENCE
COMMITTEE ON **VETERANS'** AFFAIRS
SUBCOMMITTEE ON BENEFITS
GAMING CAUCUS, Vice Chairman
AIR POWER CAUCUS
NATIONAL GUARD AND RESERVE
COMPONENTS CAUCUS

COMMITTEE ON RESOURCES

SUBCOMMITTEE ON NATIONAL PARKS
AND PUBLIC LANDS

SUBCOMMITTEE ON ENERGY AND MINERAL RESOURCES

COMMITTEE ON ARMED **SERVICES**

SUBCOMMITTEE ON MILITARY PROCUREMENT

SUBCOMMITTEE ON MILITARY READINESS

Congress of the United States
House of Representatives

May 10, 2000

The Honorable Rodney Slater
U.S. Department of Transportation
400 7th Street, SW, Room 10200
Washington, D.C. 20590

Dear Secretary Slater:

I am requesting that you award at least four slots for non-stop service between Las Vegas **McCarran** International Airport and Ronald Reagan Washington National Airport @CA) pursuant to Section 23 1 of the 'Wendell H. Ford Aviation Investment and Reform Act for the 2 1st Century' (AIR-21), P.L.106-181.

As you know, Section 23 1 amends the 1,250-mile DCA "perimeter rule" by directing you to grant 12 new slots for service beyond this perimeter. A **carrier(s)** serving the Las Vegas community should receive **at least four** of these 12 new slots (two daily round trip flights), principally because it would strongly satisfy the primary criteria for new service as set forth under AIR-21. Specifically, non-stop service between Las Vegas and DCA would: (1) increase competition by new entrant air carriers or in multiple markets; and, (2) provide air transportation with domestic network benefits in areas beyond the perimeter.

Both National Airlines and America West want to provide non-stop service between Las Vegas **McCarran** International Airport and DCA. Both airlines are also new entrants. As such, they would increase competition by new entrant airlines and in multiple markets by providing this service.

Multiple communities beyond Las Vegas of varying sizes and locations would also benefit from non-stop service between **McCarran** International Airport and DCA. Specifically, they would receive enhanced one stop and single connection services via Las Vegas on National Airlines, America West, or one or more of the **other** carriers that serve **McCarran**.

No other community outside the 1,250-mile perimeter rule **would satisfy the AIR-21** requirements in such a positive fashion as Las Vegas. Consequently, I again urge you to award four new slots to a carrier(s) proposing to provide non-stop service between DCA and **McCarran** International Airport.

CONGRESSIONAL OFFICES:

100 CANNON HOUSE OFFICE BUILDING
WASHINGTON, DC 205 15
(202) 225-6155
FAX: (202) 225-5679

400 SOUTH VIRGINIA STREET, SUITE 502
RENO, NEVADA 89501
(775) 686-5780
FAX: (775) 686-5711

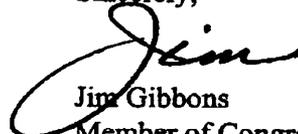
850 SOUTH DURANGO DRIVE, SUITE 107
LAS VEGAS, NEVADA 89 145
(702) 255-1851
FAX: (702) 255-1927

WESTERN FOLKLIFE CENTER
501 RAILROAD STREET, SUITE 202
ELKO, NEVADA 89801
(775) 777-7920
FAX: (775) 777-7922

The Honorable Rodney **Slater**
May 10, 2000
Page 2

Thank you for your consideration in this most important matter. I look forward to your response.

Sincerely,



Jim Gibbons
Member of Congress

JG/jc



BRUCE L. WOODBURY
Chairman

Board of County Commissioners

CLARK COUNTY GOVERNMENT CENTER
500 S GRAND CENTRAL PKY
PO BOX 551601
LAS VEGAS NV 89155-1601
(702) 455-3500 FAX: (702) 383-6041

April 26, 2000

The Honorable Rodney E. Slater
Secretary of Transportation
U.S. Department of Transportation
400 7th Street SW
Washington, D.C. 20590

Re: Slot Exemption Proceedings
Docket OST - 2000-718

Dear Mr. Secretary:

On behalf of the Board of Commissioners of Clark County, Nevada, I would respectfully request that your Department award at least four slots for non-stop service between McCarran International Airport and Reagan National Airport. The economic vitality of our County and our presence as a center for commerce in the western region of the U.S. indicate that such service is called for and would provide both great local and national public benefits.

Over the last 30 years, Clark County has grown from under 300,000 people to over 1.3 million residents, an over four-fold increase. Clark County has the nation's fastest growing population and encompasses an area larger than the entire State of New Jersey. The County's economy has also experienced astonishing growth rates in the last several years. The County includes the five incorporated cities of Las Vegas, Henderson, North Las Vegas, Boulder City and Mesquite; each a part of this rapid population growth and economic expansion.

Community leaders and elected officials across the County recognize the importance of economic development and diversification. It is this recognition and subsequent follow through that has attracted an array of new businesses and has helped make Southern Nevada the new business hub of the West. As such, the air service provided at McCarran International Airport, which serves Clark County and the region, is part and parcel of this development as well as the demand for connecting air services to cities throughout the United States.

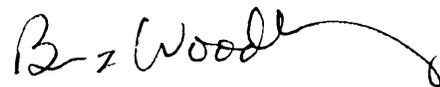
Mr. Secretary
April 26, 2000
Page 2

Southern Nevada will also soon realize other "zones" that will demand adequate air service that would be greatly aided by non-stop service between **McCarran** and Reagan National airports. One such zone is a solar enterprise zone that is currently in the developmental stage and involves four locations, including a **\$150** million solar power facility at the Nevada Test Site. Spearheaded by the U.S. Department of Energy, the project will feature solar energy research and production technology. Another proposed zone is for a test site for a **\$600** million base to launch non-nuclear communication satellites into space. Located **65** miles north of Las Vegas, this will be yet another source for air service demand to directly link Clark County with Reagan National Airport.

Regardless of where you look in Southern Nevada, you will see a dynamic community that's on the move; a community serving many tourist and business needs for our nation. As such, it is clear that the Department's award of at least four slots for direct service between **McCarran** International Airport and Reagan National Airport would best serve the public good and meet the criteria established by the Congress.

Thank you for considering our views.

Sincerely,

A handwritten signature in black ink that reads "Bruce L. Woodbury". The signature is written in a cursive style with a long, sweeping flourish at the end.

BRUCE L. WOODBURY



OSCAR B. GOODMAN
MAYOR

May 11, 2000

The Honorable Rodney E. Slater
Secretary of Transportation
U. S. Department of Transportation
400 7th Street SW
Washington, D.C. 20590

Re: Slot Exemption Proceedings
Docket OST 2000-7 181

Dear Secretary Slater:

The City of Las Vegas has the demand for **both local** and connecting air service, including that for non-stop service between **McCarran International Airport and Ronald Reagan Washington National Airport**. This service would help **address** existing as well as expected **service demands** and would provide both local and most importantly national benefits. The community of Las Vegas, consequently, **strongly urges you** to award at least four slots for non-stop **service between McCarran and Reagan National**.

For the **13th** consecutive year, Nevada has claimed **the title** of fastest growing state in the nation and much of that growth has occurred in **the City of Las Vegas**. **Las Vegas** is, in fact, the fastest **growing city in the nation- Across** the nation and throughout **the world**, countless **surveys, reports and news stories** tout the Las Vegas **Valley as the fastest growing area, the new business hub of the West, economically strong and the list goes on.**

Without doubt, Las Vegas is among the most attractive destinations for companies seeking to **relocate or expand**. Las Vegas, for example, is the **developer/owner** of the mixed-use business **parks**. Last **year**, the Nevada Development **Authority** assisted **over 30** non-gaming companies **relocate** to the city, **creating** more than **3,000** new jobs. Most of these companies arrived from **California**, with **manufacturing** representing the **largest type of industry coming to the city**. This business **growth** continues unabated.

Las Vegas is **centrally** located, with overnight delivery to **all major markets in the Southwest**. Fortune **500** companies such as **Levi Strauss have**, among other reasons, located **manufacturing and distribution centers** in Las Vegas to **take advantage of this central location**. The area's **transportation system provides** relatively **low rates on trucking, rail, and freight services**.

CITY OF LAS VEGAS
400 STEWART AVENUE
LAS VEGAS NEVADA 89101

VOICE 702.226.6241
FAX 386.7960
TDD 702.386.9106

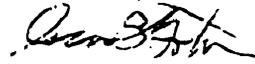
EMAIL ogoodman@ci.las-vegas.nv.us
WEBSITE www.ci.las-vegas.nv.us

McCarran International Airport, the **9th** Busiest airport in the nation and **1st** busiest airport **in the world**, recently **opened** a new **terminal** that **includes 26** addition& aircraft **gates** to **keep** pace **with the** increased visitor and business **activity**. **The Air** Cargo center continues **to expand** at a rapid **rate** and has **grown** **from a 78, 000 square foot** warehouse **in 1993** to **more** than **170,000** square feet today.

All of this points to one conclusion; that the award of the precious public **commodity of** slots for non-stop **service** between **McCarran** and Reagan National airports would **provide great** public benefits **to** these two communities **as well as** the **nation**. You **can, therefore, make** a **significant contribution** to the public interest by **making** this award.

Thank you for **your** consideration, I appreciate the opportunity to present the **views** of Las Vegas, its citizens. **and** its **business** on this most important matter,

Sincerely,



Oscar **B.** Goodman
Mayor
City of **Las** Vegas

Mayor
Michael L. Montandon

Council Members
William E. Robinson
John K. Rhodes
Stephanie S. Smith
Shari Buck



City Manager
Patrick P. Importuna

Assistant City Managers
Kurt Fritsch
Michele F. Richardson

2200 Civic Center Drive • North Las Vegas, Nevada 89030-6307
Telephone: (702) 633-1007 • Fax: (702) 649-1302

April 26, 2000

The Honorable Rodney E. Slater
Secretary of Transportation
U.S. Department of Transportation
400 7th Street SW
Washington, D.C. 20590

Re: Slot Exemption Proceedings
Docket OST – 2000-7181

Dear Secretary Slater:

I am writing to ask that you award at least four slots for direct service between McCarran International Airport and Ronald Reagan Washington National Airport. This would allow North Las Vegas and the Southern Nevada region to receive much needed nonstop service to Reagan National. Such service is vitally important to the large numbers of existing and expected travelers to and from my community and the region.

As part of the greater Las Vegas area, the City of North Las Vegas has experienced rapid growth in its population and business activity. Like many of the constituents I serve, I am part of that growth, having moved to the Southern Nevada region in 1992. In addition, as one who works in the construction management industry, I have witnessed first-hand the dynamic business and associated population growth of North Las Vegas and its neighboring communities.

Most importantly, the Southern Nevada area, including North Las Vegas, is at the cutting edge of U.S. economic growth. Our numerous and rapidly diversifying businesses, their connections and service to communities across the nation, and our emergence as a business hub for the western United States all make McCarran international Airport a strong choice for direct flights to Reagan National Airport.

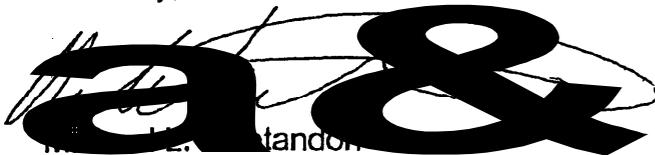
The Honorable Rodney E. Slater
April 26, 2000 - Page 2

Clearly there is a need for and a compelling public interest in providing direct service between the Southern Nevada area and Reagan National Airport. I **understand, for example,** that the number of origin and destination **passengers in the Las Vegas/Washington, DC area market** has **grown** faster than that of **any** other applicant city markets in this proceeding. I would also **note** that the carriers that want to serve the **McCarran/Reagan National** route are new entrant airlines, which would enhance competition in this **market**.

It is for these reasons that i would again urge you to award at least four slots for two daily round trip flights between McCarran International Airport and Reagan National Airport. That decision would be in the best interests of the United States and to air service **consumers**.

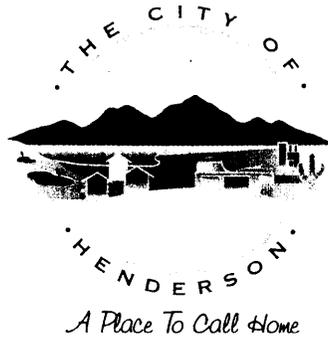
Thank you for **the** opportunity to comment **on** this proceeding and present the views of the City of North Las Vegas.

Sincerely,

A large, stylized handwritten signature in black ink, appearing to read "Rodney Slater". The signature is written over a large, bold, black graphic that resembles the letters "a" and "s" connected together.

Mayor

JAMES B. GIBSON
MAYOR



April 26, 2000

The Honorable Rodney E. Slater
Secretary of Transportation
U.S. Department of Transportation
400 7th Street SW
Washington, D.C. 20590

RE: Slot Exemption Proceedings
Docket OST – 2000-7181

Dear Mr. Secretary:

I would urge you to award at least four slots for non-stop service between Las Vegas McCarran International Airport and Ronald Reagan Washington National Airport (DCA). This service would provide great benefits to the City of Henderson and the Southern Nevada Region as well as other communities beyond the so-called perimeter of DCA.

Henderson is the second largest city in the State of Nevada and grew over 150 percent in the decade of the 1990s. Our vision for Henderson is of a fully integrated, progressive and engaged community of citizens and neighborhoods that enjoys premiere amenities, services, and opportunities. We are working hard to realize our vision and non-stop service between McCarran and Reagan National airports would aid us greatly to this end.

Henderson is recognized as a great place for business. In the past two decades, city leaders, working in close partnership with the community, have been aggressively diversifying the city's economy by attracting new, modern industries and businesses. Some of the nation's best known and most respected corporations have established major operations in Henderson. These include, but are not limited to, Ocean Spray Cranberries, Inc.; Good-Humor-Breyers, Sara Lee hosiery, Levi Strauss & Company, Ford credit and Providian Bank. Henderson continues to attract many businesses as well as residents.

CITY HALL 240 WATER STREET HENDERSON, NV 89015
702-565-2323

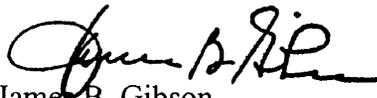
The Honorable Rodney E. Slater
April 26, 2000
Page Two

Henderson is also part of a fast growing domestic and international market connection. Major trade shows and conventions hosted in Southern Nevada bring millions of convention delegates to the area every year. Foreign Trade Zone #89 operates through a variety of sites in Southern Nevada, including Henderson. This offers great advantages to firms involved in moving both foreign and domestic products throughout the United States. Most importantly, this indicates how non-stop service between McCarran and Reagan National airports would benefit not only Henderson and the Southern Nevada region, but would also provide tremendous air service network benefits to the nation.

Your decision on the award of beyond DCA perimeter slots is significant. I would again urge you to provide at least four of those slots for direct service between McCarran and Reagan National airports. This service opportunity would, I believe, make a significant contribution to not only the public interest of Henderson, but also that of the Southern Nevada region and the nation.

Thank you for your consideration in this matter.

Sincerely,



James B. Gibson
Mayor

JBG;skf

NEVADA
DEVELOPMENT
AUTHORITY

April 18, 2000

The Honorable A. Bradley Mims X-3
Deputy Assistant Secretary of Aviation and International Affairs
Department of Transportation
Room 6401
400 Seventh Street, SW
Washington, DC 20390

Dear Mr. Secretary:

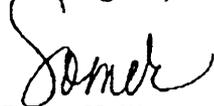
Nevada Development Authority (NDA) is a non-profit economic development organization dedicated to the diversification of the Southern Nevada economy. National Airlines is a well respected member of our community, and on behalf of NDA, I am writing to express our strong support for their petition to obtain five slot exemptions at O'Hare International Airport and six slot exemptions at Reagan National Airport..

The Las Vegas community works diligently to attract more customers and businesses to our area. Regrettably, seating capacity into the city has largely remained stagnant. National Airlines' entrance into O'Hare and Reagan National would help boost Nevada businesses and ensure the availability of lower average ticket prices.

We applaud the Administration's efforts to work with Congress in passage of AIR 21. it is a monumental measure that will certainly enhance the safety of air travel, improve airport infrastructure, and provide more accessibility to locations across the country. Las Vegas is ideally located to serve the Southwest and Western regions of the United States. That is precisely why we hope you will give strong consideration to National Airlines' petition. And as a new entrant, one of the criteria listed in AIR 21, we feel that it should warrant deliberation.

Your favorable consideration of National Airlines' request would be greatly appreciated. Should you have any questions, or desire more information, please feel free to contact me.

Warmest regards,



A. Somer Hollingsworth
President & Chief Executive Officer

ASH:kam



May 1 , 2000

The Honorable Rodney E. Slater
Secretary of Transportation
400 7th Street SW
Washington, D. C. 20590

Dear Secretary Slater:

I am joining other Las Vegas community and business leaders in requesting that you award at least four slots for non-stop service between Las Vegas McCarran International Airport and Ronald Reagan Washington National Airport (DCA) pursuant to Section 231 of the "Wendell H. Ford Aviation Investment and Reform Act for the 21st Century" (AIR-21), P.L. 106.181.

As you know, Section 231 amends the 1,250-mile DCA "perimeter rule" by directing you to grant 12 new slots for service beyond this perimeter. A carrier(s) serving the Las Vegas community should receive at least four of these 12 new slots (two daily round trip flights), principally because it would strongly satisfy the primary criteria for new service as set for under AJR-21. Specifically, non-stop service between Las Vegas and DCA would (1) increase competition by new entrant air carriers or in multiple markets and (2) provide air transportation with domestic network benefits in areas beyond the perimeter.

I understand that both National Airlines and America West want to provide non-stop service between Las Vegas McCarran International Airport and DCA. Both airlines are also new entrants. As such, they would increase competition by new entrant airlines and in multiple markets by providing this service. Multiple communities beyond Las Vegas would also benefit from non-stop service between McCarran International Airport and DCA by receiving enhanced one stop and single connection services via Las Vegas on National Airlines, America West, or one or more of the other carriers that serve McCarran.

Las Vegas offers many positive factors that speak to why there should be non-stop service between the community and DCA. Among those is that Las Vegas is the fastest growing community in our nation with a population of over 1.5 million. Also, the Federal Reserve Bank of St. Louis has ranked Las Vegas as its "Most

Livable Big City in America". In addition, Las Vegas recently added 20,000 hotel rooms to an already healthy base of 100,000 rooms. Clearly, the award of non-stop services to Las Vegas will further enhance its growth and will generate all-important new jobs for the community.

Consequently, I again urge you to award four of the referenced slot exemptions for DCA as set for in AJR-21 to a carrier(s) proposing to operate DCA to Las Vegas McCarran International Airport non-stop service.

Sincerely,

A handwritten signature in black ink, appearing to read "Frank Pankratz". The signature is fluid and cursive, with a large loop at the end.

Frank D. Pankratz
Senior Vice President & General Manager

FDP/cms