

BEFORE THE
DEPARTMENT OF TRANSPORTATION
WASHINGTON, D.C.

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In re: Award of Exemptions to the High)
Density Rule and the Perimeter Rule at)
Ronald Reagan Washington National) Docket No. OST-2000-7181
Airport under 49 U.S.C. § 41718(a))
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In re: Award of Exemptions to the High)
Density Rule at Ronald Reagan Washington) Docket No. OST-2000-7182
National Airport under 49 U.S.C. § 41718(b))
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CONSOLIDATED RESPONSE OF THE
METROPOLITAN WASHINGTON AIRPORTS AUTHORITY

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miles would be exempt from the High Density Rule.²

1. The High Density Rule and The Perimeter Rule Are Not At Issue in These Proceedings.

MWAA is not taking a position on the relative merits of these applications. MWAA does acknowledge the benefits that additional choices in air service and air fares that these applicants, both incumbents at National or new entrant carriers, may bring to travelers to and from the metropolitan Washington region as a result of these proceedings. Congress was clear, however, in section 41718(a) that these exemptions are for “limited frequencies” and the Department, in issuing its notice establishing this proceeding, referred to the new law’s criteria for exemptions as “strict criteria.” (Notice of Establishment of Slot Exemptions Proceedings, April 14, 2000). MWAA concurs with that description and urges the Department to apply the criteria rigorously in making its decisions.

Several of the applicants raise wholly irrelevant matters by continuing to attack the very existence of the High Density Rule and the Perimeter Rule. Delta refers to these restrictions as “pre-deregulation remnants” that “serve no useful purpose.” (Delta application, page 18.) America West attacks the Perimeter Rule as “pernicious,” unneeded and unfair. (America West application, pages 4 and 5.) Frontier assails the High Density rule generally and particularly the aspect of the rule that allows for buying and selling of slots. Perhaps these pleadings are aimed at another proceeding, but the applicants’ views of the High Density Rule and the Perimeter Rule are not relevant to this proceeding and should not influence the Department in any way as to how these exemptions are awarded. The exemptions must be awarded in accordance with the strict criteria established by law and by the Department.

For the record, we continue to consider the High Density Rule and the Perimeter Rule to be important to National and Dulles airports and to the communities that they

49 United States Code and from the requirements of subparts K and S of Part 93 of Title 14 of the Code of Federal Regulations.

³ The High Density Rule and the Perimeter rule at National date back to 1966 when jets were first introduced at the airport. These rules were used in the 1960s to manage the use of the airports. See CAB

serve.³ In the event that the Department undertakes further study or review of these rules, we would, of course, participate. But arguments about the underlying merits of these provisions are not relevant to these proceedings.

2. The Impact on Travel Options at Dulles Must Be Considered.

The Statutory criteria are clear. The Secretary must find, for beyond the perimeter exemptions, that the exemptions will:

- (1) provide air transportation with domestic network benefits in areas beyond the perimeter;
- (2) increase competition by new entrant air carriers or in multiple markets;
- (3) not reduce travel options for communities served by small hub airports and medium airports within the perimeter; and
- (4) not result in meaningfully increased travel delays.

Understandably, the applicants for the exemptions have focused most of their efforts on the first two criteria as these are the principal areas of difference among them. MWAA, however, wishes to point the Department to an aspect of criterion 3 that has not been thoroughly addressed by the applicants.

The principal concerns about allowing beyond the perimeter flights have been, first, that they would cause carriers to reduce flights from National to short haul markets, and, second, they would cause carriers to move their Dulles flights into National thereby affecting the service patterns at Dulles. The carriers here have addressed the first concern. Because the exemptions for beyond the perimeter flights are being accommodated by an

Order E-23743, May 25, 1966 and CAB Order E-24174, September 12, 1966. These rules have also been employed by the Department in the Metropolitan Washington Airports Policy, 46 Fed. Reg. 58036, Nov. 16, 1981, and by Congress in the 1986 Act to establish rational policies for the use of these airports. The Airports Authority filed a detailed history of these rules in FAA Docket No. 27664, "Study of the High Density Rule."

exemption from the High Density Rule, there will be no reduction of slots under the High Density Rule for inside the perimeter service. All of the applicants state that they have no intention of reducing their service at National to points inside the perimeter.

However, the carrier applicants have not uniformly stated that they will continue their comparable operation at Dulles if they acquire the exemption slot at National. A flight beyond the perimeter originating at Dulles may feed or be fed by many shorter haul flights inside the perimeter. If the Dulles flights were reduced as a result of the grant of this exemption there could be a corresponding reduction of service to these smaller markets that are inside the perimeter. These connecting flights will not easily migrate to National because of the space and the slot restrictions, among other things. Delta Airlines specifically addressed this and states that it does not intend to reduce its flights at Dulles. (Delta application, page 14). The other applicants for the beyond the Perimeter flights are silent on the issue of whether their proposed service at National could reduce service between Washington, D.C. and smaller markets within the perimeter that are served today via Dulles. In assessing the impacts on travel options under criterion 3 the Department should consider whether a smaller community within the perimeter that has service to Washington, D.C. via Dulles today is likely to lose or have that service significantly reduced as a result of the grant of this exemption.

An Increase of More Than Two Slots an Hour Could Cause Delays at National

In addressing the fourth criterion most, if not all, of the applicants state that the award of the exemptions will not create any travel delays. MWAA does not dispute these conclusions with regard to National because the law is very clear that the exemptions can result in an increase of no more than two slots in any one hour. Spreading the slots at National evenly throughout the day is important to minimize the effects of peaking or bunching of scheduled operations. The Department will have the task of assuring that as a result of the exemptions awarded under 41718(a) and (b) there are no more than a total of two exemptions an hour awarded. Several of the applicants have, while applying for

exemptions in specific hours, expressed their willingness to be flexible and to adjust their proposed schedule if necessary to assure that no more than two exemptions were granted in any one hour.

MWAA is concerned that many of the applicants have cited a study by the General Accounting Office (GAO) for the proposition that National can accommodate up to 7 more flights an hour without experiencing delays. (See “GAO Report to the Secretary of Transportation: Reagan National Airport. Capacity to Handle Additional Flights and Impact on Other Area Airports” September 1999.) MWAA disagrees with this conclusion and so told GAO at the time of the study. Indeed, MWAA’s letter to GAO is included in the appendix to their report.

The essence of the disagreement is this: The High Density Rule allocates slots for instrument flight rule (IFR) conditions. 14 CFR 93.123. It is an IFR rule, not a visual flight rule (VFR) conditions regulation. The issue is, or should be, how much capacity does National have in IFR conditions. But the GAO based its conclusion that National could handle more traffic on the “balanced capacity” of the airport, i.e., the capacity determined by blending National’s IFR and VFR capacities. This was derived from a 1995 DOT study.⁴ Of course the blended capacity will be higher than the IFR capacity alone. The report concludes that based on the “balanced capacity” analysis National can handle up to 7 more operations an hour, i.e., increase the total operations allowed under 14 CFR Part 93 from 60 to 67 an hour. However, in true IFR conditions such a number of scheduled (or “reserved” operations for general aviation) will result in significant delays at National. Indeed, the same 1995 Study of the High Density Rule (FAA Report to Congress, May 1995) concluded that, at 67 scheduled operations an hour, operational delays at National, in terms of average minutes of delay per operation would nearly triple, from 4.6 minutes of delay per operation, on average, to 12 minutes per operation, on average. We believe that the delays would be significant in IFR conditions if the number of scheduled operations were permitted to increase by 7.⁵

⁴ U.S. DOT Report to the Congress: A Study of the High Density rule, May 1995.

⁵ Also, the balanced capacity analysis was performed before the advent of the regional jet aircraft in

MWAA believes it is essential that the Department, in addressing the fourth criterion in this proceeding, not embrace the results of the GAO study as many of the applicants have advocated. It is not necessary to do so. MWAA does not quarrel with the concept that the two additional slots per hour will not cause delays. But one can see from the sheer number of applications in this proceeding that there is a demand by the airlines to place more flights at National. As the push for still more flights at National continues in the future, the capacity and delay issues will be very relevant. More study may be needed. We believe that National's IFR capacity is the relevant measure, not its VFR or balanced capacity.

In a matter related to delay, some of the applicants cite to the fact that prior to the Department's issuance of the 1981 Metropolitan Washington Airports Policy (46 FR 58036, November 27, 1981) the number of slots for air carrier operations at National was 40 per hour. They imply that these exemptions will not result in delays because the number of air carrier operations will still be below historic levels. In fact, when the number of air carrier slots was reduced from 40 to 37 in 1981 there was a corresponding increase in the number of regional and commuter slots from 8 to 11. The number of general aviation slots stayed the same at 12. So the total number of slots has always been 60 an hour. The present proceeding WILL result in an increase in the total number of scheduled operations, all of which should be considered in calculating delays.

4. The Department must find 'Exceptional Circumstances' to allow a 'slot slide'

The Department will have to decide on the relationship between these exemptions under Section 41718 and the "slot slide" exemptions authorized by 49 U.S.C. 41714(d). It may be that Midwest Express is correct that the two are independent authorizations and it is possible that exemptions granted under both can result in an increase of up to 4 slots in an

significant numbers. National remains essentially a one runway airport for jet aircraft, particularly in IFR conditions. The greater use of National's main runway by regional jets, that is, by regional or commuter air carriers that once operated smaller turbo prop aircraft on the cross wind runways, would reduce the balanced capacity of National if that analysis were done today.

hour. It could not be any clearer, however, that Congress wants these slots spread throughout the day and is very concerned about the concentration of these slots. Thus, the limitations to two an hour are in both exemption provisions. The slot slide provision calls for the Department to find that “exceptional circumstances” exist to warrant the moving of the slot. It is clear that the Department has to make a finding in this regard. This need for an “exceptional” circumstance seems to be particularly compelling when the result will be an increase not of two, but of four in a scheduling hour. A carrier’s mere preference for a more convenient or competitive schedule is not “exceptional,” as that will always be the carrier’s reason.

5. There are no ‘community’ slots under § 41718

Finally, by the language of the statute, the exemptions under section 41718(a) and (b) are authorized for “air carriers.” Central Illinois Regional Airport has applied for “community” slots and has indicated that it has an arrangement with an airline to fly the route if the slots are awarded. However, we believe that the letter of the law in this case precludes the grant of these exemptions to anyone other than an air carrier applicant. We would have no objection if an air carrier has applied for the exemption and satisfies the Department that an award of an exemption to serve this airport should be made.

We hope that these comments are helpful. Thank you for the opportunity to comment.

Respectfully submitted,
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CERTIFICATE OF SERVICE

I hereby certify that on May 22, 2000, a copy of the Consolidated Response of the Metropolitan Washington Airports Authority was served upon the persons shown on the attached service list by first class mail.

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