

BEFORE THE  
DEPARTMENT OF TRANSPORTATION  
WASHINGTON, D.C.

40692

Applications of  
American Airlines, Inc.  
American Trans Air, Inc.  
America West Airlines, Inc.  
Frontier Airlines, Inc.  
National Airlines, Inc.  
Northwest Airlines, Inc.  
Trans World Airlines, Inc.  
United Air Lines, Inc.  
for beyond-perimeter slot exemptions at  
Washington Reagan National Airport pursuant  
to 49 U.S.C. § 41718

ORIGINAL

Docket OST-00-7181 -46

CONSOLIDATED ANSWER OF  
DELTA AIR LINES, INC.

Communications with respect to this document should be addressed to:

**D. Scott Yohe, Senior Vice President -  
Government Affairs**  
DELTA AIR LINES, INC.  
1275 K Street, N.W.  
Washington, D. C. 20005  
(202) 216-0700

**Robert E. Cohn  
Alexander Van der Bellen**  
SHAW PITTMAN  
2300 N Street, N.W.  
Washington, D.C. 20037  
(202) 663-8060

**John J. Varley, Assistant General Counsel  
W. Paul Zampol, General Attorney**  
DELTA AIR LINES, INC.  
Law Department #987  
1030 Delta Boulevard  
Atlanta, Georgia 30320  
(404) 715-2779

Attorneys for  
DELTA AIR LINES, INC.

May 22, 2000

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**CONSOLIDATED ANSWER OF  
DELTA AIR LINES, INC.**

**I. INTRODUCTION.**

For many decades, access to the Nation’s Capitol, via its preferred close-in gateway at Washington Reagan National Airport (“DCA”), has been artificially restricted for residents of Western states by the perimeter rule. This is particularly true for the many small and medium sized communities served only through Western hub airports, that must currently endure double or even triple connections to reach National Airport.

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Delta's Salt Lake City-DCA proposal represents the most effective way to lift the DCA service restrictions and improve competitive options for the greatest number of U.S. communities, because Delta's application is the only proposal involving a large Western hub that has both the geographic location, as well as the scope of operations, necessary to provide improved access to DCA for large underserved regions of the Western United States.

Delta's Salt Lake City proposal is the most comprehensive and well balanced proposal of any applicant. Salt Lake City is a large and important city in its own right. However, unlike west coast cities such as Los Angeles and San Francisco, whose airports generate predominately local Washington DC. passengers, the Salt Lake City-Washington route is characterized by a healthy mix of both local and connecting passengers.

In any comparative evaluation, Delta's application ranks at the top of the list in terms of the Department's guiding statutory approval criteria of providing "domestic network benefits in areas beyond the perimeter" and "increas[ing] competition . . . in multiple markets." 49 U.S.C. § 41718(a). This is because Delta's large Salt Lake City hub will provide unmatched coverage for large areas of the United States that lie outside the perimeter and which do not have adequate service options for travel to DCA:

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- Delta will provide 33 cities outside the perimeter with effective nonstop to nonstop connections to DCA—more than any other applicant. (DL-R-101, 111-113)
- Delta will benefit 27 small and medium sized communities with nonstop to nonstop DCA service — again, more than any other applicant. (DL-R-121-125)
- Delta will offer DCA service from the largest airline hub in the intermountain West, providing the greatest number of non-circuitous connections for the largest number of Western communities. (DL-R-114-120)
- Delta will offer service from the least-congested Western hub airport with the best on-time record of any competing carrier/gateway hub. (DL-R-129, 130)

The selection of Delta will do more to intensify domestic network competition in the Western region of the United States than any other applicant. Through its system of strategically placed hubs, Delta blankets the entire country with a comprehensive array of network services. The primary hub through which Delta serves the West is Salt Lake City. However, because of the DCA

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perimeter rule, Delta is artificially cut off from providing effective network coverage between DCA and the Western United States.

Whereas other applicants such as American, United, Northwest and TWA have extensive Western network coverage from their existing hubs within the perimeter (i.e. Dallas, Chicago, Minneapolis/St. Paul and St. Louis), Delta is at a serious service and competitive handicap because its Western U.S. network coverage is concentrated at Salt Lake City, which lies outside the DCA perimeter.

An award of four DCA-Salt Lake City slot exemptions to Delta will bring the strength of the largest U.S. passenger carrier to bear on improving service and competitive options for DCA travelers throughout the Western United States, and will have a greater impact on competition in multiple markets, and in projecting domestic network benefits to more communities beyond the perimeter, than any other applicant.

**II. CALIFORNIA APPLICATIONS**

American, United, TWA and American Trans Air have all applied to operate nonstop DCA services benefiting primarily local California-Washington markets that receive extremely high levels of nonstop service at other

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Washington area airports (16 flights a day in the case of Los Angeles and 12 flights a day for San Francisco). California's far Western location makes it poorly situated to serve as a connecting gateway for all but a handful of West Coast cities - many of which already have competitive nonstop-to-nonstop connections to DCA. Accordingly, the services proposed by the California applicants would produce relatively few network benefits.

American, United and TWA are not "new entrant" carriers. Therefore, in order to satisfy the statutory approval criteria, these carriers must demonstrate that they will "increase competition . . . in multiple markets". See 49 U.S.C. § 41718(a)(2). However, as is quite apparent from their applications, each of these carriers is enthralled with the size of the large Los Angeles-DCA local market. Rather than "increasing competition in multiple markets" the effect of granting any one of these incumbents DCA-LAX authority would merely benefit a single local nonstop competitor. While ATA would be a "new entrant" carrier, it offers nothing in the way of domestic network benefits, as required by the statute.

**A. American**

American's desire for DCA-LAX authority is motivated by its desire to gain a leg up on United in the already healthy and vigorously competitive Los

Angeles-Washington local market:

For the year ended June 30, 1999, United Carried 445,140 passengers in the Los Angeles-Washington market (DCA and IAD), a 50.9% share, followed by American with 271,350, a 31.0% share . . . Granting American's request for 4 DCA exemption slots will make American a stronger competitor at Los Angeles in general, and in the Los Angeles-Washington market in particular . . .

AA Application at 4.

American does not need a hand out in this proceeding to further indulge its longtime rivalry with United. In fact, American competes very effectively with United, offering four daily nonstop flights on the Los Angeles-Washington (Dulles) route in competition with United, as well as seventy 1-stop DCA-LAX connections via American's Chicago O'Hare and Dallas/Ft. Worth hubs.

American would do almost nothing to "increase competition in multiple markets" as it is required to do in order to qualify for an award under the statute. Not only would American be able to offer few attractive connections from LAX, but American already operates one of the largest hubs serving the Western United States at Dallas/Ft. Worth. DFW is located within the 1,250 mile Washington perimeter, giving American DCA access and the ability to serve a host of Western cities on a nonstop-to-nonstop connecting basis, including most of the cities where American claims it will "increase

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competition” in this application. Providing American duplicate access via Los Angeles to cities such as Fresno, Palm Springs, San Jose, San Francisco, San Diego, Reno, Las Vegas and Honolulu – which American already serves via DFW – will not benefit competition or the public interest in any meaningful way.

**B. United**

Like American, United focuses on the “scale of the Los Angeles market” and its benefits to the large number of local passengers that travel between Washington and Los Angeles. However, United also attempts to tout the supposed network benefits of its “newest hub” at LAX.

United’s claimed network benefits are illusory. LAX, perched on the Pacific Coast, is extremely ill-suited to serve as an effective east-west connecting hub for domestic service to and from DCA. Unlike Salt Lake City, which provides comprehensive and non-circuitous coverage for the entire Western region, Los Angeles can effectively serve only a narrow sliver of communities on the west coast. DL-R-102. This is because inland Western cities must endure a 180 degree backhaul to travel to Washington via Los Angeles.

While United may indeed operate a hub at Los Angeles, the “network

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benefits” of the hub inure primarily to international, and not *domestic* passengers, as *required* by the statute. See 49 U.S.C. § 41718(a)(1). Los Angeles is not well suited to collect traffic moving between the Eastern and Western regions of the United States; however, United uses Los Angeles to collect traffic moving beyond the United States to Japan, the South Pacific, and up and down the West Coast to and from Latin America. Thus, it is not surprising that United devotes a substantial portion of its exhibits to extolling the potential link between DCA and United’s “Global LAX Network” (UA-11); the new Foreign Inspection Service (FIS) facilities that have been constructed for United’s benefit at LAX (UA-16); and the benefits United will provide for the “50,000 annual passengers who will travel between Washington and the South Pacific” (UA-28).

Delta submits that the express language of Air 21 to improve “*domestic* network benefits in areas beyond the perimeter” was meant to improve Washington access for *U.S. communities* to their Nation’s capital, and not to improve airport options for international passengers from Auckland, Perth, and Pago Pago. See, UA-28.

Moreover, as the length of haul increases, the convenience advantage of Washington National over Dulles Airport becomes less and less relevant in the

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context of total travel time. On a 20 hour journey between Washington and New Zealand, the 30 minute additional drive time difference between DCA and IAD is hardly relevant. However, on trips of shorter duration, such as between communities in the Rocky Mountain West and Washington, the airport convenience advantage is decidedly more important.

Indeed, Los Angeles itself, which is a full continent away from Washington, and an hour further flying time than Salt Lake City, is already beginning to stretch the limits of convenience relevance. For passengers connecting via Los Angeles, the benefits are even more attenuated. Salt Lake City provides a convenient Western gateway that is still proximate enough to Washington in terms of total travel time to have meaningful benefit to the traveling public.

Finally, given that United operates over 3,200 nonstop seats a day between its Washington Dulles and Los Angeles hubs, it will continue to have strong motivation to move connecting passengers on its huge existing capacity, and reserve DCA seats for the highest paying Los Angeles-DCA local passengers, thereby further diminishing any claimed network benefits for its proposed services.

**C. American Trans Air**

In weighing the American Trans Air and Delta applications, the Department must compare the relative benefits of utilizing four DCA slots to benefit Salt Lake City and the 33 additional communities served by Delta beyond Salt Lake, versus ATA's proposal to serve just two discrete points in California, both of which enjoy extremely high levels of nonstop service from other Washington airports. *Compare*, DL-R- 101; DL-R- 105, 106.

ATA would provide no network benefits beyond the perimeter, because ATA has no viable connections to and from its proposed Los Angeles or San Francisco gateways. Thus, ATA fails to satisfy the first and most important statutory approval criterion of "provid[ing] air transportation with domestic network benefits in areas beyond the perimeter . . ." 49 U.S.C. § 41718(a)(1).

While ATA holds out the promise of improved service to Hawaii, those benefits do not exist in reality because travelers would have to wait more than nine hours to make connections. (ATA generously offers its passengers "free stopovers" but neglects to mention that stopovers are a practical necessity for onward travel on ATA. Application at 16.)

ATA does not need an award of beyond-perimeter slots to be an effective

competitor in the California-DCA marketplace. Indeed, ATA boasts that its existing DCA-California services via Chicago Midway carry “as many as eighty passengers [per flight] destined for California.” ATA application at 4.

Therefore, by its own admission, ATA’s one-stop services provide ATA with a strong and viable opportunity to compete in the DCA-California marketplace.

**D. TWA**

TWA’s DCA-Los Angeles proposal suffers from the same structural defects as each of the preceding applicants. Los Angeles is an exceedingly poor connecting gateway for Western U.S.-DCA traffic. Moreover, TWA currently has almost no viable connecting services at Los Angeles. Even if the Department were to accept TWA’s non-existent paper commuter feeder proposal at face value, TWA would offer *de minimis* network benefits, serving just 5 small California cities in comparison to the 33 cities in 11 states that Delta would serve on a nonstop-to-nonstop connecting basis from Salt Lake City. DL-R-101, DL-R-104.

The Department should not expend this valuable public opportunity in the way of a regulatory subsidy to TWA, when the DCA beyond-perimeter slots can be used to achieve much greater public interest benefits elsewhere. TWA claims that its “very survival hinges upon its ability to compete in markets that are now

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dominated by larger entrenched carriers. ” (Application at 2) In fact, TWA does not want to *compete* at all, but would prefer to operate on the protected DCA-Los Angeles route, where it is effectively insulated from competition. The ostensible purpose of Air 21 was not to “revitalize” aging carriers nor to “ensure [TWA’s] long-term profitability” by awarding it protected monopoly routes. TWA Application at 11. Rather, the clear and express purpose of Air 2 1 was to *increase competition and domestic network benefits*. On that score, TWA’s application is seriously lacking.

Moreover, TWA operates a large east-west hub located within the DCA perimeter at St. Louis. In fact, on many occasions, including the three consecutive U.S. -Toronto route proceedings, TWA has touted the effectiveness of St. Louis as a highly desirable gateway for service to the Western regions of the United States. See, Briefs of TWA, Dockets OST-96-1538, 95-782, and Docket 50168.

The stand-alone DCA-Los Angeles service TWA is proposing in this proceeding would contribute almost nothing to TWA’s beyond-perimeter *network* capability, and the blatant regulatory subsidy basis upon which TWA has appealed to the Department is not an authorized statutory approval criteria under Air 21.

**III. AMERICA WEST**

America West has requested ten out of the twelve available beyond-perimeter slot exemptions. Given the legislative context of Air 21, Delta recognizes that America West will likely receive exemption authority in this proceeding. However, essentially all of the network and competitive benefits of the America West proposal can be realized by the award of two round-trip frequencies to America West for service to Phoenix or Las Vegas. America West does not need and should not receive slots to operate *five* daily flights to serve duplicative and overlapping hubs in the southwest region.

To the contrary, awarding more than two frequencies to American West for Phoenix service would defeat the network-expanding and competitive benefits sought by Air 21, because the award of excess authority to America West would preclude the introduction of other competitive carrier networks and competitive beyond-perimeter gateways. American West's excessive request for ten out of the available 12 DCA slots would give it a virtual lock on beyond-perimeter service, and defeat the development of rival Western network services contemplated by Congress, such as would be provided by Delta at Salt Lake City.

It is ironic that America West would submit such an excessive request for

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DCA slots when America West itself just recently strenuously opposed a similar excessive request by Legend for 80 percent of the slots in the Chicago O'Hare slot exemption proceeding: "In passing Air 21, Congress did not intend to grant nearly all of the 30 newly available ORD exemption slots to [one carrier]."

Answer of America West, Docket OST-00-6970 (April 11, 2000). Yet here, America West asks for more than 80 percent of the newly available beyond-perimeter slots. America West should abide by its own admonition.

Las Vegas and Phoenix are scarcely 250 miles apart, and serve exactly the same southwestern network catchment area. DL-R-107. America West's larger Phoenix hub serves 15 out of the 16 potential Las Vegas nonstop-to-nonstop connecting markets (assuming a reasonable 2 hour connecting window and 30 percent circuitry cut-off). DL-R-127. Accordingly, authorizing the Las Vegas service proposed by America West would produce no additional network benefits for that carrier, but would prevent meaningful double-daily service at a competitive gateway. Similarly, with two daily flights, America West will be able to provide morning and evening DCA services to and from all of the cities in its Phoenix complex. DL-R-128.

Another important statutory consideration is that the authorized services should "not result in meaningfully increased traffic delays." 49 U.S.C.

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§ 41718(a)(4). In that regard, America West's Phoenix and Las Vegas hubs rank dead last among the applicant gateways. Phoenix had an on-time arrival rate of just 68 percent, and Las Vegas only 71 percent for the year ended March 2000. DL-R-129. Adding more America West flights to these delay-prone hubs would pose the most serious risk to increasing travel delays.

On the opposite end of the spectrum, Salt Lake City ranks first in on-time arrivals and departures. Delta at Salt Lake City achieved an on-time arrival rate of 85 percent for the year ended March 2000. DL-R-130. Western U.S.-DCA passengers will have a much better probability of reaching their destination without undue delay on Delta than America West or any other applicant. Id.<sup>1</sup>

Therefore, while Delta expects that America West will receive slot exemptions for DCA service, America West should receive no more than two daily roundtrip flights. Since Phoenix and Las Vegas serve effectively the same catchment area, America West could split its award between the two cities

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<sup>1</sup> In light of Delta's superior on-time performance and high customer service commitment, it is not surprising that Delta received less than a quarter of the DOT customer complaints that America West received in the year ended March 30, 2000. DL-R-131. Delta's customer complaint rate was also less than that of any other applicant carrier.

depending on its own operational needs.

#### **IV. FRONTIER**

Frontier's proposal to provide DCA service from its much smaller Denver hub is substantially inferior to Delta's Salt Lake City proposal in terms of network and competitive benefits. DL-R-109.

Frontier serves only nine cities beyond Denver as compared to 33 beyond-Salt Lake connections for Delta. DL-R-111. Frontier would serve zero new nonstop-to-nonstop connection cities versus 14 for Delta. DL-R-112. Because Frontier has a relatively small hub at Denver, it has constructed its limited services primarily to benefit the largest Western cities. Of the nine cities Frontier would serve beyond Denver, each currently has *at minimum* five competitive nonstop-to-nonstop DCA competitors, ranging to as many as ten competitors in larger DCA connecting markets such as Los Angeles and Phoenix. DL-R-132.

Consequently, small and medium sized communities in the Rocky Mountain West that are most critically lacking in terms of DCA access would continue to be neglected under Frontier's proposal. Altogether, Delta would benefit 27 small and medium sized communities with new or improved access to

DCA, as compared to just two for Frontier. DL-R-124.

Another substantial weakness of Frontier's proposal is the small aircraft with which it would provide beyond-perimeter service. Delta's 757 proposal will deliver over 17,000 more annual seats (35 percent more) than Frontier's 737 proposal, thereby having a greater positive effect on beyond-perimeter network service and competition. DL-R-133.

Contrary to Frontier's assertions, it is by no means the low fare maverick for services to the Western United States. In fact, Delta's fares from the Washington area to Frontier's destinations outside the perimeter are 22 percent lower than Frontier's DL-R-135. Supply and demand are invariably the primary determinants of price. Delta's proposal to deliver more seats to and from more beyond-perimeter DCA city-pairs will undoubtedly have a more positive effect on service and competition than Frontier's proposal.

## **V. NATIONAL**

National's Las Vegas-DCA proposal would be a poor use of the scarce beyond-perimeter DCA slots. National's own data shows that demand for DCA-Las Vegas service is flat, and that demand for Washington area nonstop Las Vegas service is actually shrinking. National Application at 6. Not only is there

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flat or diminishing demand for local service, but National would also fail to provide any meaningful new network competitive benefits, especially considering that San Francisco and Los Angeles-National's only two beyond-LAS service points -- already have numerous and highly competitive nonstop-to-nonstop DCA connections. DL-R- 139.

If National believes there is demand for the essentially point-to-point Washington-Las Vegas service it is proposing, it can implement its services at Dulles or BWI without utilizing the scarce DCA slots, which Air 21 intended to be used for beyond-perimeter domestic network benefits and increasing competition in multiple markets.

**VI. NORTHWEST**

Northwest's proposal to offer a single daily A-319 flight between DCA and Seattle would produce minimal network and competitive benefits. With only 124 seats, Northwest's A-319 is the smallest aircraft of any applicant and would produce the fewest benefits per operation. DL-R-137. Northwest has almost no domestic network of its own at Seattle, and would be forced to rely on services flown by Alaska Airlines.

Located in the extreme Northwest corner of the mainland United States,

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Seattle is poorly positioned to serve as a domestic connecting hub. Substantially all of Northwest's claimed domestic connecting cities (which are in truth served by Alaska Airlines) would have to endure a 180 degree backhaul for travel to DCA via Seattle. Over 80 percent of potential DCA O&D connecting passengers from the cities identified in Northwest's Seattle application would have superior and less circuitous connections over Salt Lake City, and would receive true online service provided by Delta and the Delta Connection. DL-R-138. In fact, Northwest itself already provides less circuitous DCA connections to many cities such as Boise, Billings, Great Falls and the like via its large within-perimeter hub at Minneapolis/St. Paul.

Northwest's claimed benefits to "8 international cities in Japan, Mexico and Canada" have no relevance to Air 21, which is about improving *domestic network benefits*. 49 U.S.C. § 41718. Moreover, Northwest already has extensive inside-perimeter connections to Asia via Minneapolis and Detroit, and it is almost unfathomable that DCA passengers would fly to the extreme northern reaches of the United States to then turn south and fly to Mexico.

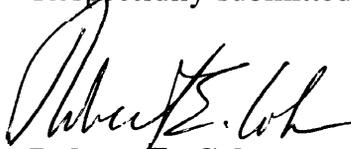
With only a single daily flight, Northwest would not be able to offer customers a choice of travel times that is an important consideration in being an effective network competitor. Furthermore, awarding Northwest a single slot

pair would preclude the Department from the most efficient and public benefits maximizing award, which would be to award two daily slot pairs to three new beyond-perimeter network carriers,

## **VII. CONCLUSION**

Under all of the relevant statutory criteria, Delta's Salt Lake City-DCA application ranks at the top of the list in providing the enhanced DCA domestic network and competitive benefits envisioned by Air 21. Accordingly, Delta should receive the four slots it needs to provide improved service and competition to the Western United States through its beyond-perimeter hub at Salt Lake City.

Respectfully submitted,



**Robert E. Cohn**

**Alexander Van der Bellen**

SHAW PITTMAN

2300 N Street, N.W.

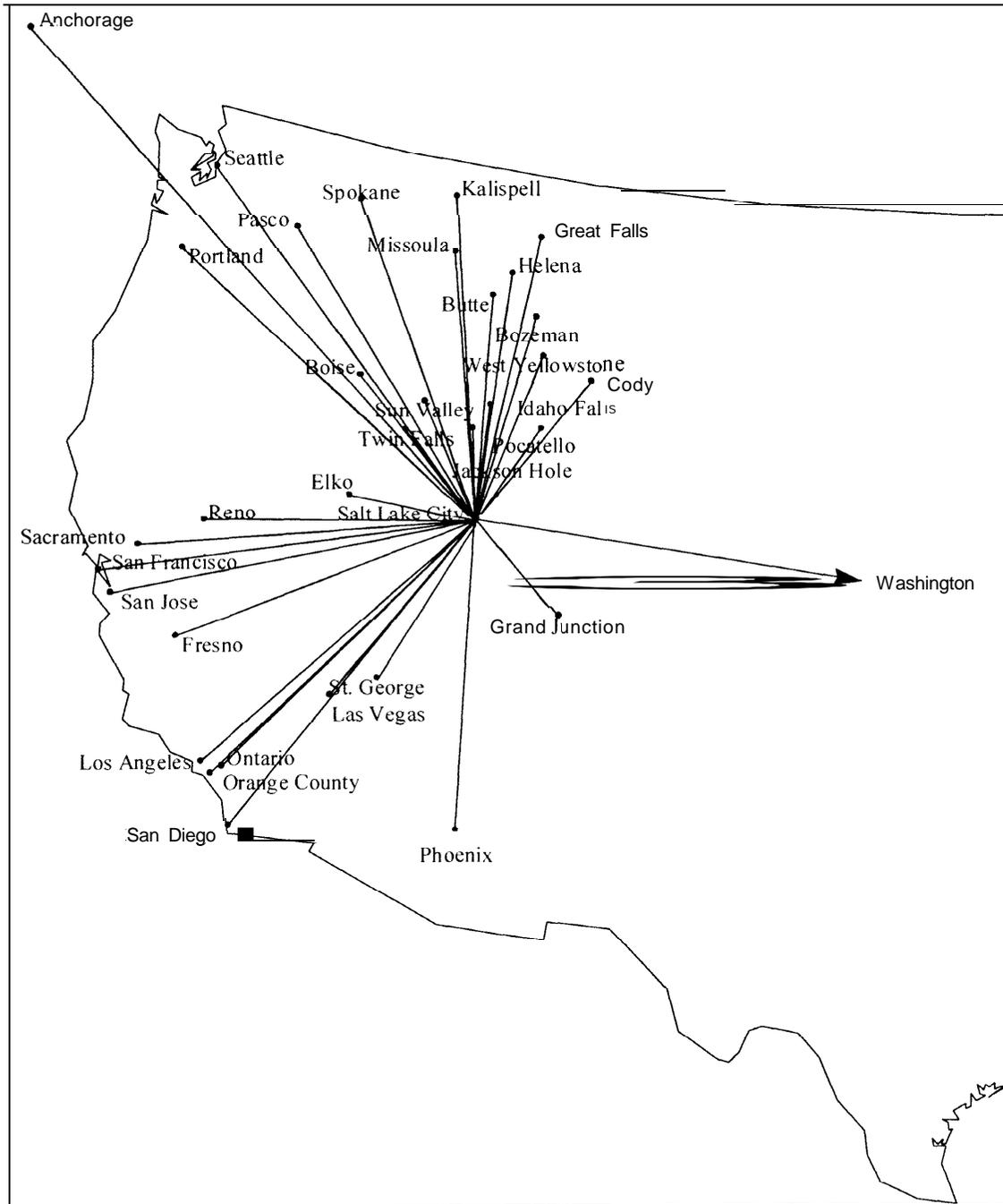
Washington, D. C. 20037

(202) 663-8060

Attorneys for

**DELTA AIR LINES, INC.**

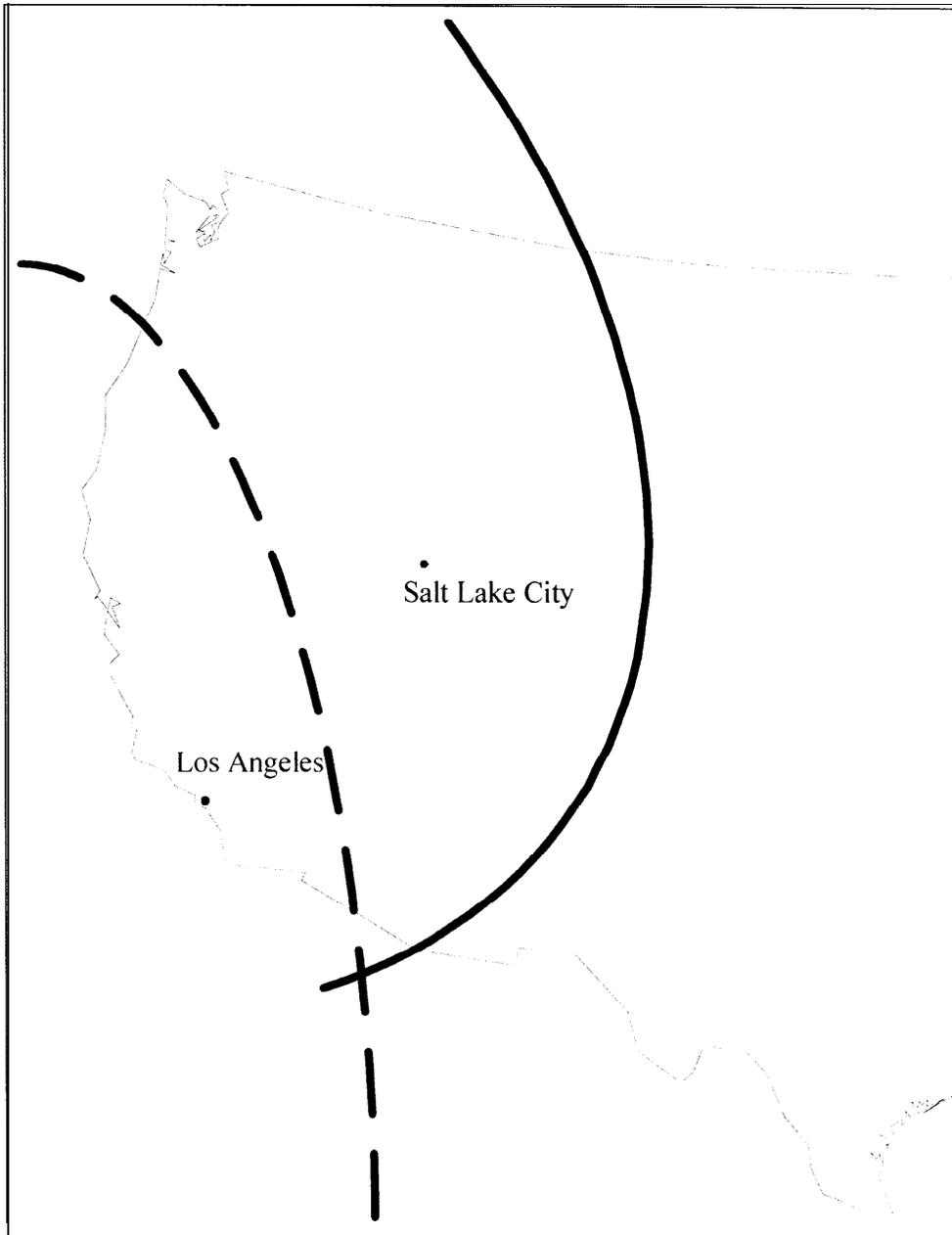
**DELTA WOULD EFFECTIVELY SERVE 33 WESTERN COMMUNITIES  
WITH ROUNDRIP NONSTOP-TO-NONSTOP DCA CONNECTIONS**



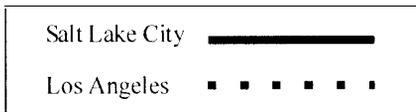
/1 Based on roundtrip domestic service. tiled minimum connect time. two hour maximum connect time. 30% maximum circuitry  
Source: Official Airline Guide, June 2000

**SALT LAKE CITY'S SUPERIOR GEOGRAPHIC LOCATION  
WILL ENABLE DELTA TO PROVIDE GREATER DOMESTIC NETWORK BENEFITS  
THAN UNITED AIR LINES OR ANY OTHER CARRIER AT LOS ANGELES**

United Offers 24 Valid Roundtrip Destinations From Los Angeles Compared To Delta's 33 At Salt Lake City

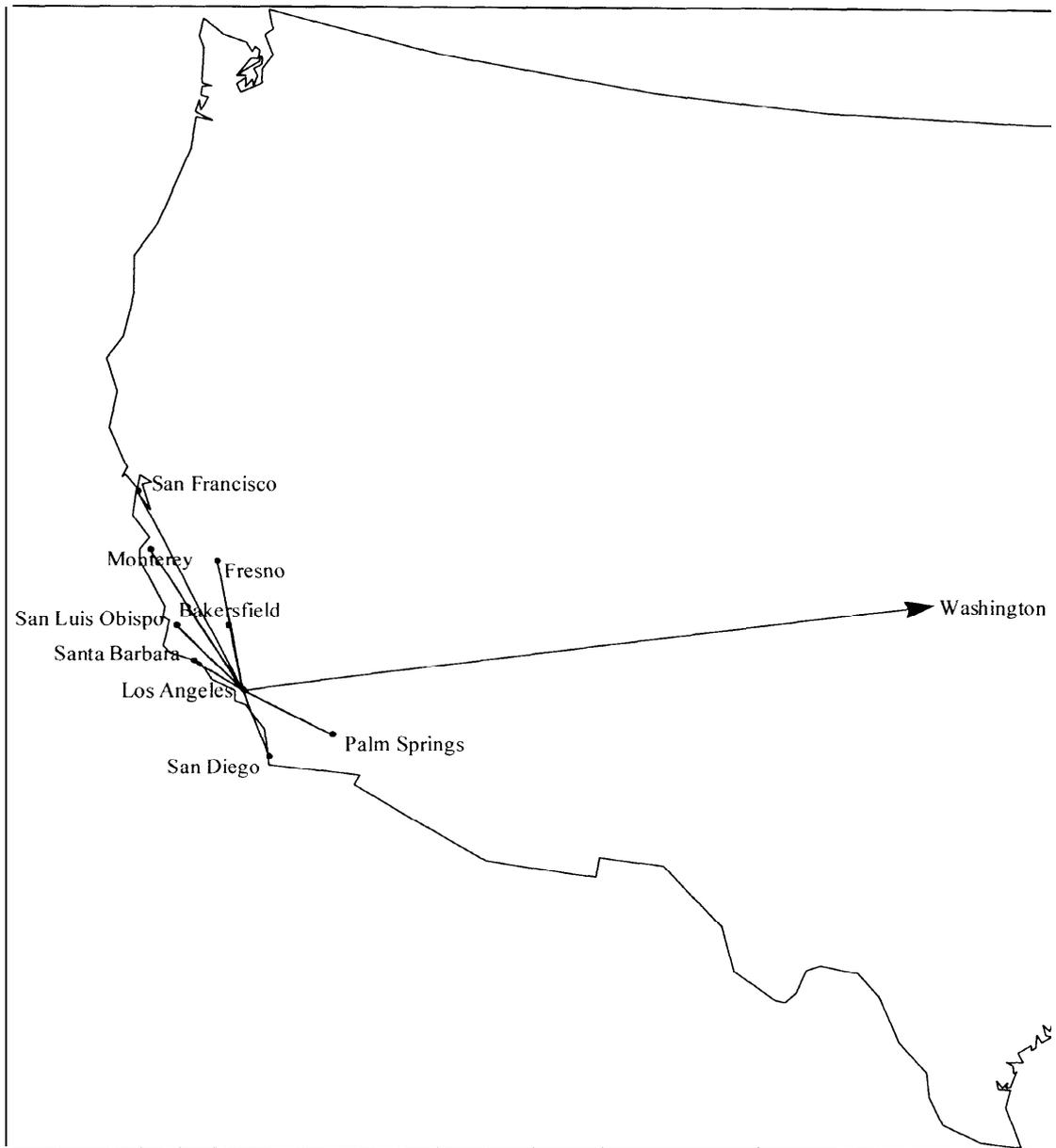


**30% Circuity From City Based On Washington, DC To City Mileage**



**DELTA SERVES 313% MORE DESTINATIONS AT SALT LAKE CITY  
THAN AMERICAN AIRLINES AT LOS ANGELES**

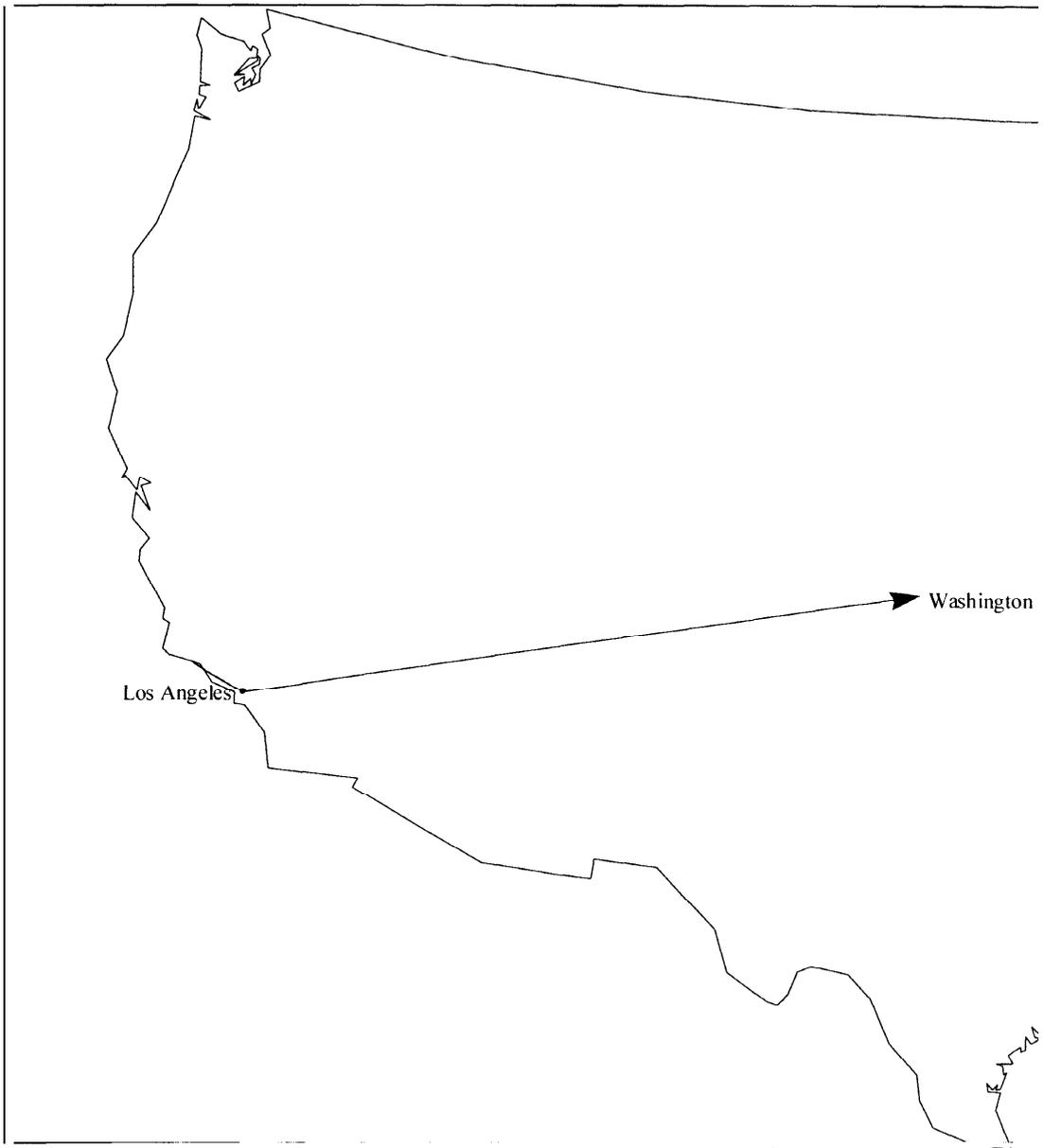
American Offers 8 Valid Roundtrip Destinations From Los Angeles Compared To Delta's 33 At Salt Lake City



Based on roundtrip domestic service. tiled minimum connect time. two hour maximum connect time. 30% maximum circuitry  
Source: Official Airline Guide, June 2000

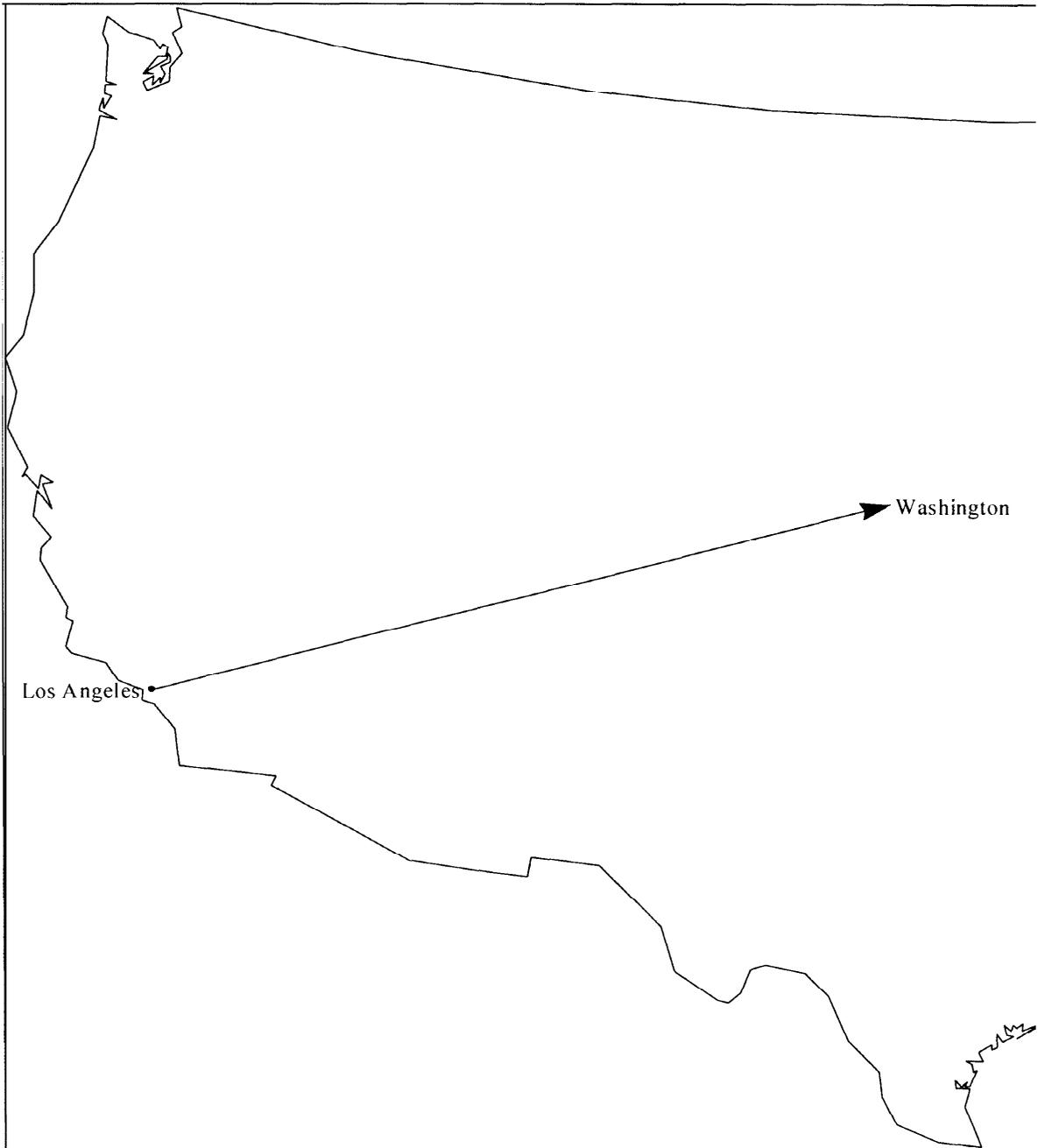
**DELTA SERVES 33 MORE DESTINATIONS AT SALT LAKE CITY  
THAN TRANS WORLD AIRLINES AT LOS ANGELES**

TWA Offers Zero Valid Roundtrip Destinations From Los Angeles



**DELTA SERVES 33 MORE DESTINATIONS AT SALT LAKE CITY  
THAN AMERICAN TRANS AIR AT LOS ANGELES**

American Trans Air Offers Zero Valid Roundtrip Destinations From Los Angeles



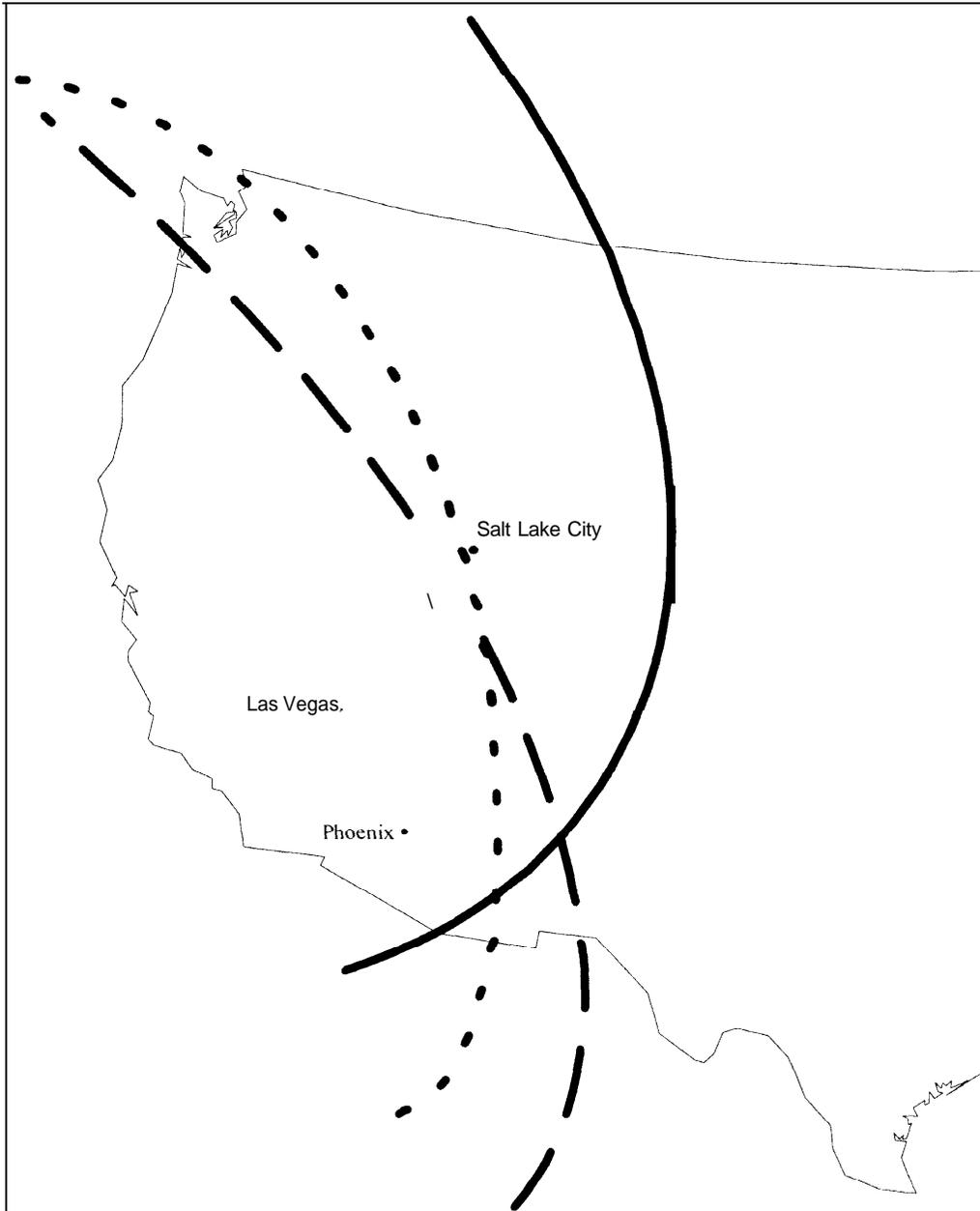
**DELTA SERVES 33 MORE DESTINATIONS AT SALT LAKE CITY  
THAN AMERICAN TRANS AIR AT SAN FRANCISCO**

American Trans Air Offers Zero Valid Roundtrip Destinations From San Francisco

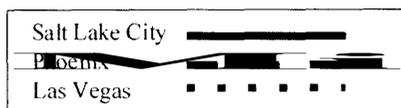


**DELTA OFFERS BETTER NETWORK COVERAGE  
FOR MORE OF THE WESTERN UNITED STATES  
THAN AMERICA WEST**

Delta Offers 10% More Destinations Within 30% Circuitry Of Salt Lake City  
Than America West Offers From Phoenix And Las Vegas Combined



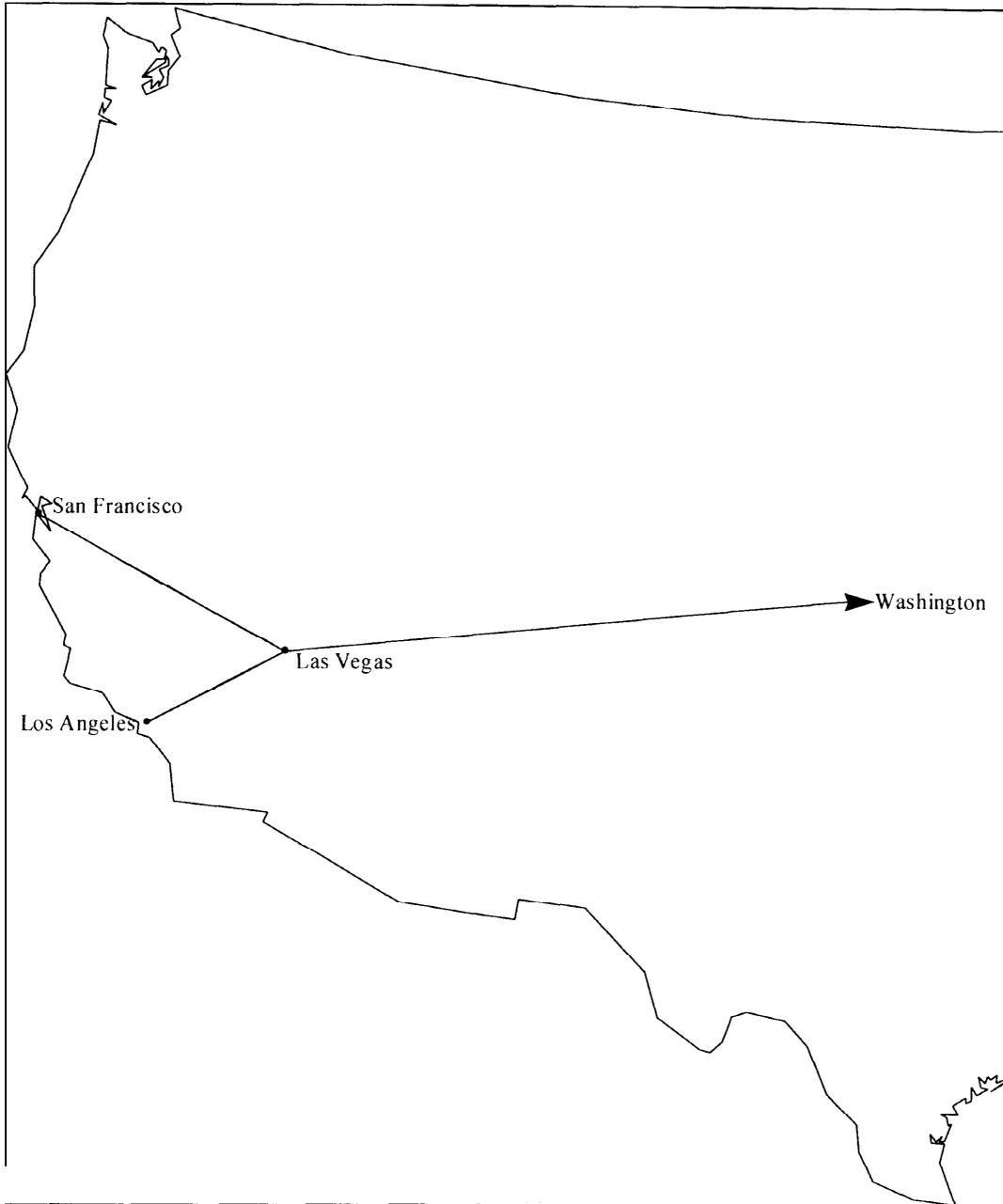
**30% Circuitry From City Based On Washington, DC To City Mileage**



Based on roundtrip domestic service. filed minimum connect time. two hour maximum connect time. 30% maximum circuitry  
Source: Official Airline Guide, June 2000

**DELTA SERVES 1550 % MORE DESTINATIONS AT SALT LAKE CITY  
THAN NATIONAL AIRLINES AT LAS VEGAS**

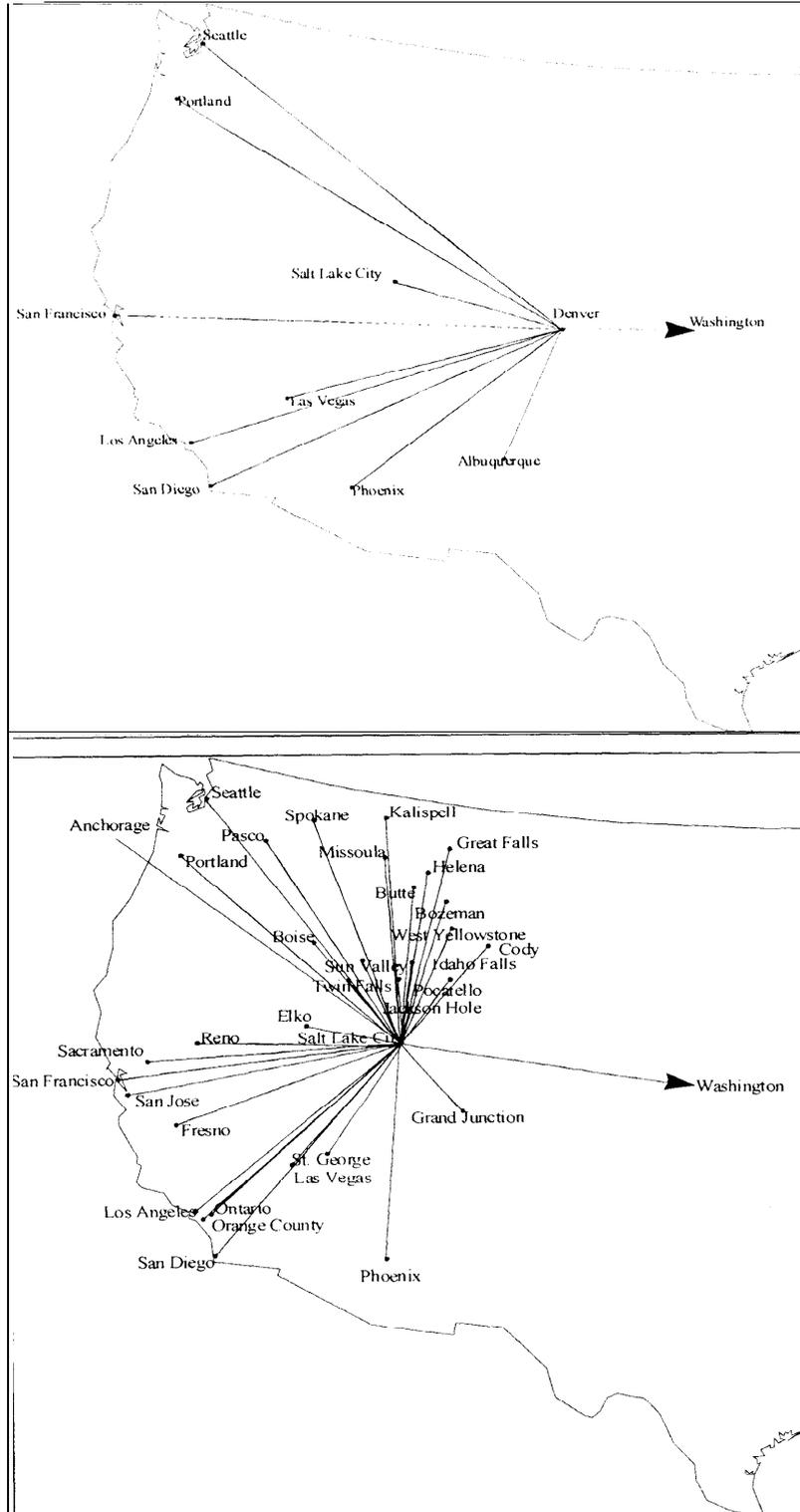
National Offers 2 Valid Roundtrip Destinations From Las Vegas Compared To Delta's 33 At Salt Lake City



Based on roundtrip domestic service, filed minimum connect time, two hour maximum connect time, 30% maximum circuit)  
Source: Official Airline Guide, June 2000

**DELTA SERVES 267% MORE DESTINATIONS AT SALT LAKE CITY  
THAN FRONTIER AIRLINES AT DENVER**

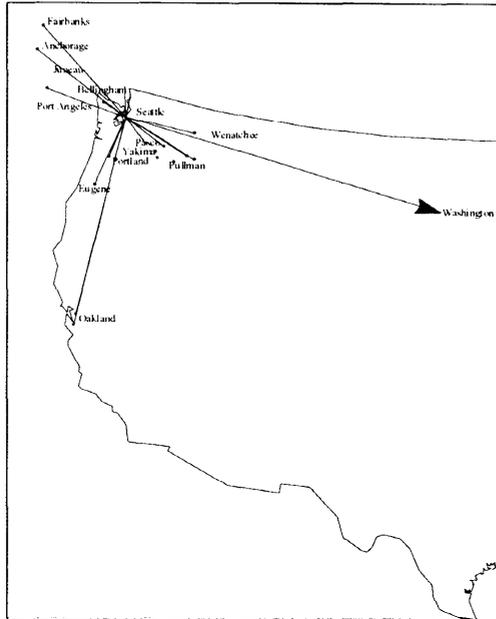
Frontier Offers 9 Valid Roundtrip Destinations From Denver Compared To Delta's 33 At Salt Lake City



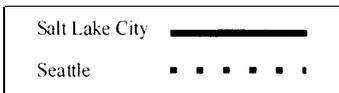
Based on roundtrip domestic service, tiled minimum connect time, two hour maximum connect time, 30% maximum circuitry  
Source: Official Airline Guide, June 2000

**EVEN GIVING NORTHWEST CREDIT FOR THE 12  
 ROUNDTrip DESTINATIONS SERVED BY ALASKA AIRLINES,  
 DELTA STILL SERVES 175 % MORE DESTINATIONS AT SALT LAKE CITY  
 THAN NORTHWEST AIRLINES AT SEATTLE**

Northwest Offers 12 Valid Roundtrip Destinations From Seattle Compared To Delta's 33 At Salt Lake City



30% Circuitry From City Based On Washington, DC To City Mileage



**DELTA'S PROPOSAL WOULD PROVIDE SERVICE  
TO THE GREATEST NUMBER OF CITIES  
OUTSIDE THE PERIMETER**

<u>Carrier</u>	Nonstop to Nonstop <u>Cities Served</u>	Number of Additional <u>Delta Cities</u>	% Delta <u>Greater Than</u>
<b>Delta</b>	<b>33</b>		
America West*	29	4	14%
United	23	10	43%
Northwest	12	21	175%
Frontier	9	24	267%
American	8	25	313%
National	2	31	1550%
Trans World	0	33	∞
American Trans Air	0	33	∞

\*over Phoenix

Based on roundtrip domestic service, filed minimum connect time, two hour maximum connect time, 30% maximum circuitry

Source: Official Airline Guide, June 2000

**DELTA'S PROPOSAL WOULD INTRODUCE NEW SERVICE TO THE GREATEST NUMBER OF CITIES**

<u>Carrier</u>	<u>New Nonstop to Nonstop Cities Served</u>	<u>Number of Additional Delta Cities</u>	<u>% Delta Greater Than</u>
<b>Delta</b>	<b>14</b>		
America West	13	1	8%
United	11	3	27%
Northwest	9	5	56%
American	4	10	250%
Frontier	0	14	∞
National	0	14	∞
Trans World	0	14	∞
American Trans Air	0	14	∞

**DELTA'S PROPOSAL WOULD INTRODUCE NEW  
 FIRST COMPETITIVE SERVICE  
TO THE GREATEST NUMBER OF CITIES**

<u>Carrier</u>	<u>Competitive Nonstop to Nonstop Cities Served</u>	<u>Number of Additional Delta Cities</u>	<u>% Delta Greater Than</u>
<b>Delta</b>	4		
America West	4		
American	2	2	100%
United	2	2	100%
Frontier	0	4	∞
National	0	4	∞
Northwest	0	4	∞
Trans World	0	4	∞
American Trans Air	0	4	∞

Based on roundtrip domestic service, filed minimum connect time, two hour maximum connect time, 30% maximum circuitry  
 Source: Official Airline Guide, June 2000

**DELTA'S PROPOSAL WOULD PROVIDE  
NEW OR FIRST COMPETITIVE NONSTOP TO  
NONSTOP SERVICE TO 17 WESTERN CITIES**

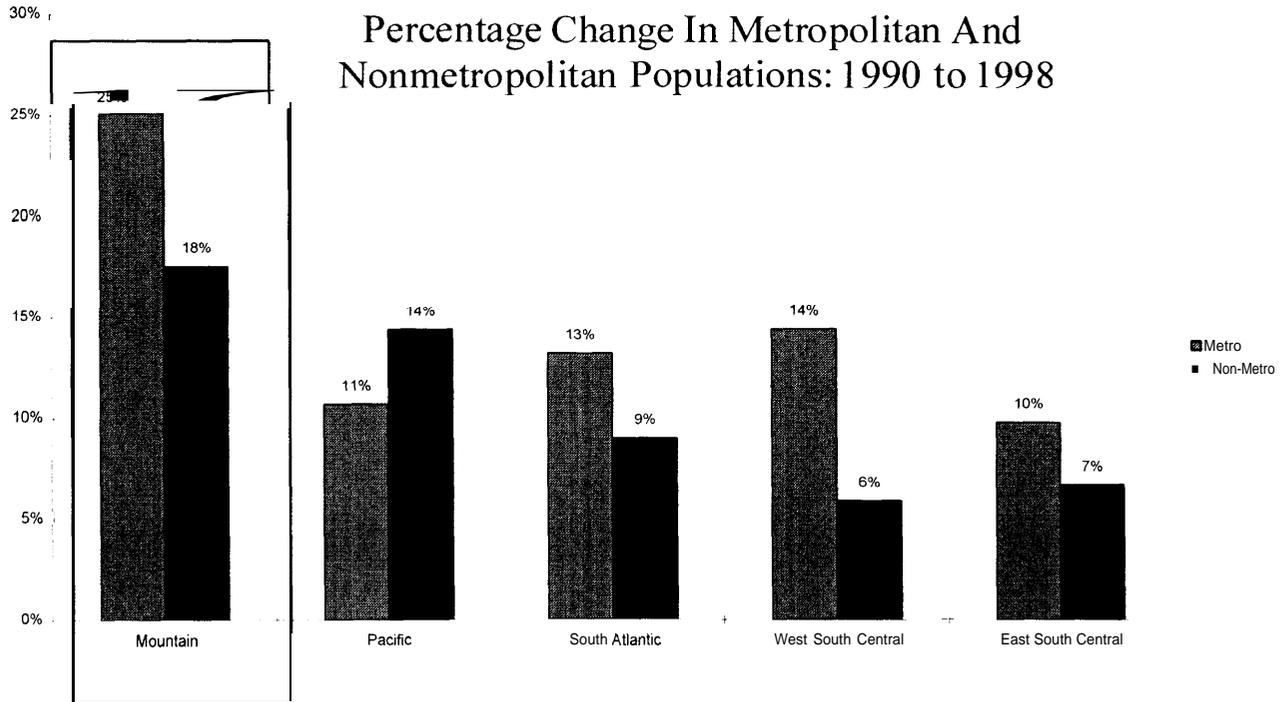
- 1 Bozeman, MT
- 2 Butte, MT
- 3 Cody, WY
- 4 Elko, NV
- 5 Fresno, CA
- 6 Grand Junction, CO
- 7 Great Falls, MT
- 8 Helena, MT
- 9 Idaho Falls, ID
- 10 Jackson Hole, WY
- 11 Kalispell, MT
- 12 Missoula, MT
- 13 Pasco, WA
- 14 Pocatello, ID
- 15 Sun Valley, ID
- 16 Twin Falls, ID
- 17 West Yellowstone, MT

**DELTA'S PROPOSAL WOULD PROVIDE NEW OR  
FIRST COMPETITIVE NONSTOP TO NONSTOP SERVICE  
FOR OVER 95,000 ANNUAL PASSENGERS**

		<b><u>O&amp;D Psgrs</u></b>
	Bozeman, MT	10,915
2	Butte, MT	1,468
3	Cody, WY	1,185
4	Elko, NV	392
5	Fresno, CA	14,554
6	Grand Junction, CO	4,357
7	Great Falls, MT	6,103
8	Helena, MT	5,005
9	Idaho Falls, ID	7,112
10	Jackson Hole, WY	13,685
11	Kalispell, MT	5,404
12	Missoula, MT	9,680
13	Pasco, WA	11,842
14	Pocatello, ID	1,021
15	Sun Valley, ID	1,607
16	Twin Falls, ID	750
17	West Yellowstone, MT	<u>190</u>
		95,270

**THE MOUNTAIN REGION IS THE FASTEST GROWING REGION OF  
OF THE UNITED STATES AND DESERVES CONVENIENT NONSTOP  
ACCESS TO WASHINGTON, D.C.**

**Delta Provides Better Network Coverage Of The Western United States Than Any Other Applicant**



**DELTA'S PROPOSAL WILL PROVIDE ACCESS FOR NEARLY 80% MORE  
 WASHINGTON O&D PASSENGERS THAN AMERICAN AIRLINES**

<u>City</u>	<u>Annual Washington O&amp;D Psgrs (000)</u>	<u>Delta at Salt Lake City</u>	<u>American at Los Angeles</u>
1 Anchorage, AK	32,293	X	
2 Bakersfield, CA	4,484		X
3 Boise, ID	21,438	X	
4 Butte, MT	1,468	X	
5 Bozeman, MT	10,915	X	
6 Lovell/Powell, WY	1,185	X	
7 Elko, NV	392	X	
8 Fresno, CA	14,554	X	
9 Kalispell, MT	5,404	X	
10 Spokane, WA	18,441	X	
11 Grand Junction, CO	4,357	X	
12 Great Falls, MT	6,103	X	
13 Helena, MT	5,005	X	
14 Idaho Falls, ID	7,112	X	
15 Jackson Hole, WY	13,685	X	
16 Las Vegas, NV	139,109	X	
17 Los Angeles, CA	799,123	X	
18 Salinas/Monterey, CA	16,368		
19 Missoula, MT	9,680	X	
20 Ontario, CA	57,366	X	
21 Portland, OR	108,964	X	
22 Phoenix, AZ	163,849	X	
23 Pocatello, ID	1,021	X	
24 Pasco/Kennewick, WA	11,842	X	
25 Palm Springs, CA	20,616		X
26 Reno, NV	33,961	X	
27 San Diego, CA	254,559	X	X
28 Santa Barbara, CA	17,689		X
29 San Luis Obispo, CA	5,339		X
30 Seattle, WA	271,842	X	
31 San Francisco, CA	588,513	X	X
32 St George, UT	522	X	
33 San Jose, CA	133,083	X	
34 Salt Lake City, UT	184,160	X	
35 Sacramento, CA	75,908	X	
36 Orange County, CA	99,188	X	
37 Sun Valley, ID	1,607	X	
38 Twin Falls, ID	750	X	
39 West Yellowstone, MT	190	X	
<b>Washington O&amp;D Psgrs</b>		<b>3,077,589</b>	<b>1,721,245</b>

<b>Delta Percent Greater Than</b>	<b>79%</b>
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Washington, D.C. defined as DCA, IAD

**DELTA'S PROPOSAL WILL PROVIDE ACCESS FOR OVER 32% MORE  
WASHINGTON O&D PASSENGERS THAN UNITED AIRLINES**

<u>City</u>	<u>Annual</u>		<u>Delta at</u>	<u>United</u>
	<u>Washington</u>	<u>O&amp;D</u>	<u>Salt Lake City</u>	<u>at Los Angeles</u>
	<u>Psgs (000)</u>			
1 Anchorage, AK		32,293	X	
2 Bakersfield, CA		4,484		X
3 Boise, ID		21,438	X	
4 Butte, MT		1,468	X	
5 Bozeman, MT		10,915	X	
6 Carlsbad, CA		3,287		X
7 Lovell/Powell, WY		1,185	X	
8 Elko, NV		392	X	
9 Fresno, CA		14,554	X	X
10 Kalispell, MT		5,404	X	
11 Spokane, WA		18,441	X	
12 Grand Junction, CO		4,357	X	
13 Great Falls, MT		6,103	X	
14 Helena, MT		5,005	X	
15 Idaho Falls, ID		7,112	X	
16 Imperial County, CA		468		X
17 Inyokern, CA		3,411		X
18 Jackson Hole, WY		13,685	X	
19 Las Vegas, NV		139,109	X	X
20 Los Angeles, CA		799,123	X	X
21 Medford, OR		5,647		X
22 Salinas/Monterey, CA		16,368		X
23 Missoula, MT		9,680	X	
24 Oakland, CA		35,174		X
25 Kahului, HI		19,570		X
26 Ontario, CA		57,366	X	X
27 Oxnard/Ventura, CA		4,773		X
28 Portland, OR		108,964	X	
29 Phoenix, AZ		163,849	X	
30 Pocatello, ID		1,021	X	
31 Pasco/Kennewick, WA		11,842	X	
32 Palm Springs, CA		20,616		X
33 Reno, NV		33,961	X	X
34 San Diego, CA		254,559	X	X
35 Santa Barbara, CA		17,689		X
36 San Luis Obispo, CA		5,339		X
37 Seattle, WA		271,842	X	
38 San Francisco, CA		588,513	X	X
39 St George, UT		522	X	
40 San Jose, CA		133,083	X	X
41 Salt Lake City, UT		184,160	X	
42 Sacramento, CA		75,908	X	X
43 Santa Maria, CA		2,372		X
44 Orange County, CA		99,188	X	X
45 Santa Rosa, CA		939		X
46 Sun Valley, ID		1,607	X	
47 Twin Falls, ID		750	X	
48 West Yellowstone, MT		190	X	
49 Yuma, AZ		2,010		X
<b>Washington O&amp;D Psgs</b>			<b>3,077,589</b>	<b>2,337,511</b>

<b>Delta Percent</b>	
<b>Greater Than</b>	<b>32%</b>

Washington, D.C. defined as DCA, IAD

**DELTA'S PROPOSAL WILL PROVIDE ACCESS FOR OVER 285% MORE  
WASHINGTON O&D PASSENGERS THAN AMERICAN TRANS AIR**

<u>City</u>	<u>Annual Washington O&amp;D Psgs (000)</u>	<u>Delta at Salt Lake City</u>	<u>American Trans Air at Los Angeles</u>
1 Anchorage, AK	32,293	X	
2 Boise, ID	21,438	X	
3 Butte, MT	1,468	X	
4 Bozeman, MT	10,915	X	
5 Lovell/Powell, WY	1,185	X	
6 Elko, NV	392	X	
7 Fresno, CA	14,554	X	
8 Kalispell, MT	5,404	X	
9 Spokane, WA	18,441	X	
10 Grand Junction, CO	4,357	X	
11 Great Falls, MT	6,103	X	
12 Helena, MT	5,005	X	
13 Idaho Falls, ID	7,112	X	
14 Jackson Hole, WY	13,685	X	
15 Las Vegas, NV	139,109	X	
16 Los Angeles, CA	799,123	X	X
17 Missoula, MT	9,680	X	
18 Ontario, CA	57,366	X	
19 Portland, OR	108,964	X	
20 Phoenix, AZ	163,849	X	
21 Pocatello, ID	1,021	X	
22 Pasco/Kennewick, WA	11,842	X	
23 Reno, NV	33,961	X	
24 San Diego, CA	254,559	X	
25 Seattle, WA	271,842	X	
26 San Francisco, CA	588,513	X	
27 St George, UT	522	X	
28 San Jose, CA	133,083	X	
29 Salt Lake City, UT	184,160	X	
30 Sacramento, CA	75,908	X	
31 Orange County, CA	99,188	X	
32 Sun Valley, ID	1,607	X	
33 Twin Falls, ID	750	X	
34 West Yellowstone, MT	190	X	
<b>Washington O&amp;D Psgrs</b>		<b>3,077,589</b>	<b>799,123</b>

Delta Percent Greater Than	<b>285%</b>
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Washington, D.C. defined as DCA, IAD

Based on roundtrip domestic service, filed minimum connect time, two hour maximum connect time, 30% maximum circuit)

Source: DOT Origin and Destination Data, YE 4Q99: Official Airline Guide, June 2000

**DELTA'S PROPOSAL WILL PROVIDE ACCESS FOR OVER 285% MORE  
WASHINGTON O&D PASSENGERS THAN TRANS WORLD AIRLINES**

<u>City</u>	Annual Washington O&D <u>Psgrs (000)</u>	Delta at <u>Salt Lake City</u>	<u>Trans World at Los Angeles</u>
1 Anchorage, AK	32,293	X	
2 Boise, MT	21,438	X	
3 Butte, MT	1,468	X	
4 Bozeman, MT	10,915	X	
5 Lovell/Powell, WY	1,185	X	
6 Elko, NV	392	X	
7 Fresno, CA	14,554	X	
8 Kalispell, MT	5,404	X	
9 Spokane, WA	18,441	X	
10 Grand Junction, CO	4,357	X	
11 Great Falls, MT	6,103	X	
12 Helena, MT	5,005	X	
13 Idaho Falls, ID	7,112	X	
14 Jackson Hole, WY	13,685	X	
15 Las Vegas, NV	139,109	X	
16 Los Angeles, CA	799,123	X	X
17 Missoula, MT	9,680	X	
18 Ontario, CA	57,366	X	
19 Portland, OR	108,964	X	
20 Phoenix, AZ	163,849	X	
21 Pocatello, ID	1,021	X	
22 Pasco/Kennewick, WA	11,842	X	
23 Reno, NV	33,961	X	
24 San Diego, CA	254,559	X	
25 Seattle, WA	271,842	X	
26 San Francisco, CA	588,513	X	
27 St George, UT	522	X	
28 San Jose, CA	133,083	X	
29 Salt Lake City, UT	184,160	X	
30 Sacramento, CA	75,908	X	
31 Orange County, CA	99,188	X	
32 Sun Valley, ID	1,607	X	
33 Twin Falls, ID	750	X	
34 West Yellowstone, MT	190	X	
Washington O&D <b>Psgrs</b>		3,077,589	799,123

Delta Percent

Greater Than

**285%**

Washington, D.C. defined as DCA, IAD

Based on roundtrip domestic service. filed minimum connect time, two hour maximum connect time. 30% maximum circuitry

Source: DOT Origin and Destination Data. YE 4Q99; cities per Official Airline Guide, June 2000

**DELTA'S PROPOSAL WILL PROVIDE ACCESS FOR OVER 15% MORE  
WASHINGTON O&D PASSENGERS THAN AMERICA WEST AT PHOENIX**

<u>City</u>	<u>Annual Washington O&amp;D Psgs (000)</u>	<u>Delta at Salt Lake City</u>	<u>America West at Phoenix</u>
1 Anchorage, AK	32,293	x	
2 Bakersfield, CA	4,484		X
3 Boise, ID	21,438	X	
4 Butte, MT	1,468	x	
5 Burbank-Hollywood, CA	5,737		X
6 Bozeman, MT	10,915	x	
7 Carlsbad, CA	3,287		X
8 Lovell/Powell, WY	1,185	x	
9 Elko, NV	392	X	
10 Eugene, OR	10,195		X
11 Fresno, CA	14,554	X	X
12 Kalispell, MT	5,404	X	
13 Ft Huachuca/Sr Vista, AZ	312		X
14 Flagstaff, AZ	779		X
15 Spokane, WA	18,441	X	
16 Grand Junction, CO	4,357	X	
17 Great Falls, MT	6,103	x	
18 Lake Havasu City, AZ	90		x
19 Helena, MT	5,005	X	
20 Idaho Falls, ID	7,112	x	
21 Bullhead City, AZ	29		X
22 Jackson Hole, WY	13,685	x	
23 Las Vegas, NV	139,109	X	X
24 Los Angeles, CA	799,123	X	X
25 Long Beach, CA	2,382		X
26 Salt nas/Monterey, CA	16,368		X
27 Missoula, MT	9,680	X	
28 Oakland, CA	35,174		X
29 Ontario, CA	57,366	X	X
30 Oxnard/Ventura, CA	4,773		X
31 Portland, OR	108,964	X	X
32 Phoenix, AZ	163,849	X	X
33 Pocatello, ID	1,021	x	
34 Prescott, AZ	54		X
35 Pasco/Kennewick, WA	11,842	x	
36 Palm Springs, CA	20,616		X
37 Reno, NV	33,961	X	X
38 San Diego, CA	254,559	X	X
39 Santa Barbara, CA	17,689		X
40 San Luis Obispo, CA	5,339		X
41 Seattle, WA	271,842	X	
42 San Francisco, CA	588,513	X	X
43 St George, UT	522	X	
44 San Jose, CA	133,083	X	X
45 Salt Lake City, UT	184,160	X	
46 Sacramento, CA	75,908	X	X
47 Orange County, CA	99,188	x	X
48 Sun Valley, ID	1,607	X	
49 Tucson, AZ	87,789		X
50 Twin Falls, ID	750	X	
51 West Yellowstone, MT	190	X	
52 Yuma, AZ	2,010		X
<b>Washington O&amp;D Psgs</b>		<b>3,077,589</b>	<b>2,685,284</b>

<b>Delta Percent</b>
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<b>Greater Than</b>
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<b>15%</b>
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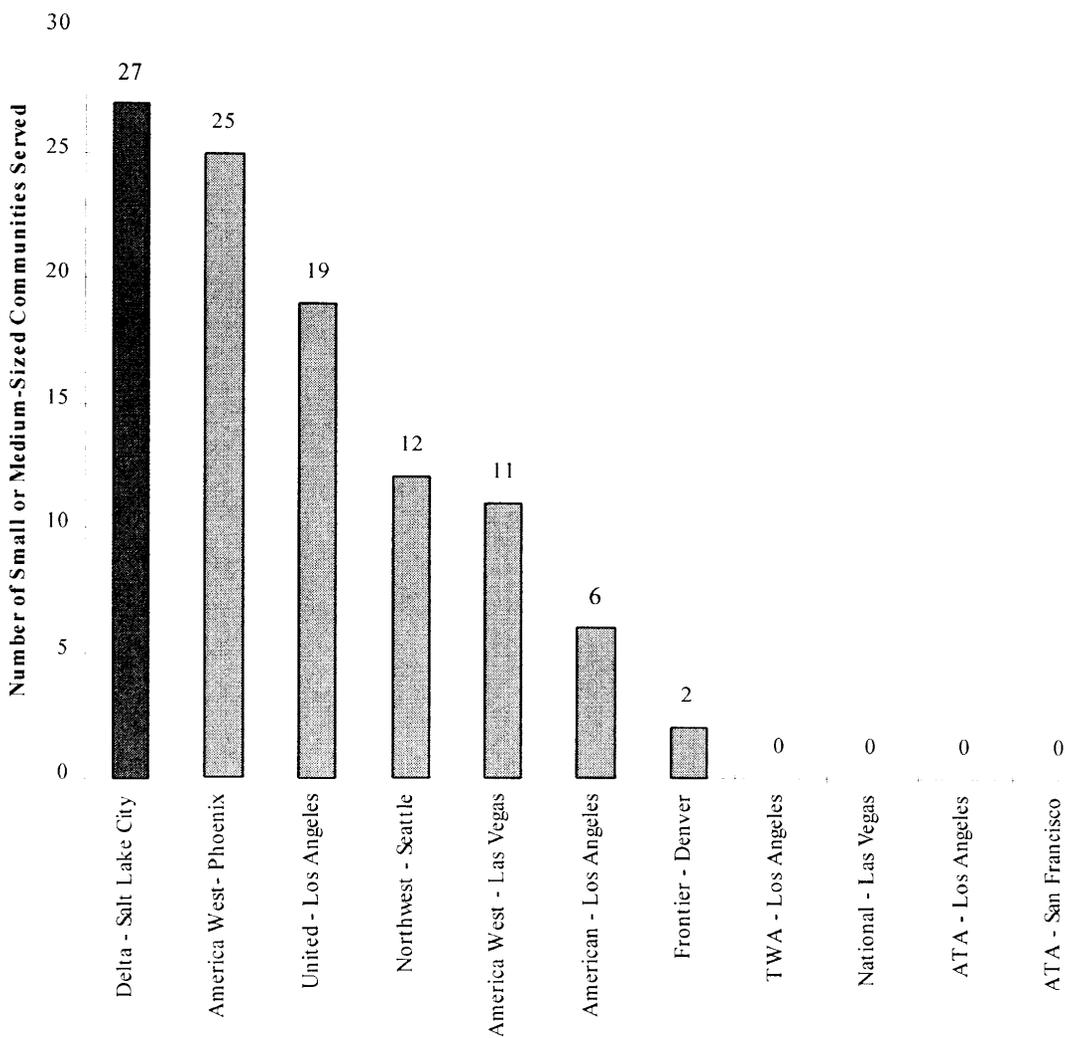
Washington, D C defined as DCA, IAD

Based on roundtrip domestic service, filed minimum connect time, two hour maximum connect time, 30% maximum circuitry

Source DOT Origin and Destination Data, YE 4Q99, Official Airline Guide, June 2000

**DELTA WILL OFFER IMPROVED DCA SERVICE  
FOR MORE SMALL AND MEDIUM-SIZED COMMUNITIES  
THAN ANY OTHER APPLICANT**

**Delta Serves More Small and Medium-Sized Communities via Salt Lake City  
Than Any Other Applicant from its Proposed Hub**



Note: Community size determined by FAA passenger enplanement statistics, CY 1998

Based on roundtrip domestic service, filed minimum connect time, two hour maximum connect time, 30% maximum circuitry

Source: Official Airline Guide, June 2000

**DELTA WILL OFFER IMPROVED DCA SERVICE  
FOR MORE SMALL AND MEDIUM-SIZED COMMUNITIES  
THAN ANY OTHER APPLICANT**

**Delta Serves More Small and Medium-Sized Communities via Salt Lake City  
Than Any Other Applicant from its Proposed Hub**

	<u>Medium</u>	<u>Small</u>	<u>Nonhub</u>	<u>Other</u>	<u>Total</u>
<b>Delta - Salt Lake City</b>	<b>7</b>	<b>3</b>	<b>16</b>	<b>1</b>	<b>27</b>
America West - Phoenix	9	5	9	2	25
United - Los Angeles	7	2	9	1	19
Northwest - Seattle	3	3	6	0	12
America West - Las Vegas	8	2	1	0	11
American - Los Angeles	0	3	3	0	6
Frontier - Denver	2	0	0	0	2
TWA - Los Angeles	0	0	0	0	0
National - Las Vegas	0	0	0	0	0
ATA - Los Angeles	0	0	0	0	0
ATA - San Francisco	0	0	0	0	0

Note: Community size determined by FAA passenger enplanement statistics, CY1998

Based on roundtrip domestic service, tiled minimum connect time, two hour maximum connect time, 30% maximum circuitry

Source: Official Airline Guide, June 2000

**DELTA'S PROPOSAL WILL OFFER IMPROVED DCA SERVICE  
FOR 21 MORE SMALL AND MEDIUM-SIZED COMMUNITIES  
THAN AMERICAN'S PROPOSAL**

**Delta at Salt Lake City**

**American at Los Angeles**

Anchorage, AK  
Boise, ID  
Bozeman, MT  
Butte, MT  
Cody, WY  
Elko, NV  
Fresno, CA  
Grand Junction, CO  
Great Falls, MT  
Helena, MT  
Idaho Falls, ID  
Jackson Hole, WY  
Kalispell, MT  
Missoula, MT  
Ontario, CA  
Orange County, CA  
Pasco, WA  
Pocatello, ID  
Portland, OR  
Reno, NV  
Sacramento, CA  
San Jose, CA  
Spokane, WA  
St. George, UT  
Sun Valley, ID  
Twin Falls, ID  
West Yellowstone, MT

Bakersfield, CA  
Fresno, CA  
Monterey, CA  
Palm Springs, CA  
San Luis Obispo, CA  
Santa Barbara, CA

Note: Community size determined by FAA passenger enplanement statistics, CY1998

Based on roundtrip domestic service, filed minimum connect time, two hour maximum connect time, 30% **maximum** circuitry

Source: Official Airline Guide, June 2000

**DELTA'S PROPOSAL WILL OFFER IMPROVED DCA SERVICE  
FOR 16 MORE SMALL AND MEDIUM-SIZED COMMUNITIES  
THAN AMERICA WEST'S LAS VEGAS PROPOSAL**

**Delta at Salt Lake City**

Anchorage, AK  
Boise, ID  
Bozeman, MT  
Butte, MT  
Cody, WY  
Elko, NV  
Fresno, CA  
Grand Junction, CO  
Great Falls, MT  
Helena, MT  
Idaho Falls, ID  
Jackson Hole, WY  
Kalispell, MT  
Missoula, MT  
Ontario, CA  
Orange County, CA  
Pasco, WA  
Pocatello, ID  
Portland, OR  
Reno, NV  
Sacramento, CA  
San Jose, CA  
Spokane, WA  
St. George, UT  
Sun Valley, ID  
Twin Falls, ID  
West Yellowstone, MT

**America West at Las Vegas**

Bakersfield, CA  
Oakland, CA  
Ontario, CA  
Orange County, CA  
Palm Springs, CA  
Portland, OR  
Reno, NV  
Sacramento, CA  
San Jose, CA  
Santa Barbara, CA  
Tucson, AZ

Note: Community size determined by FAA passenger enplanement statistics, CY 1998

Based on roundtrip domestic service, filed minimum connect time, two hour maximum connect time, 30% maximum circuitry

Source: Official Airline Guide, June 2000

**DELTA'S PROPOSAL WILL OFFER IMPROVED DCA SERVICE  
FOR 25 MORE SMALL AND MEDIUM-SIZED COMMUNITIES  
THAN FRONTIER'S PROPOSAL**

**Delta at Salt Lake City**

Anchorage, AK  
Boise, ID  
Bozeman, MT  
Butte, MT  
Cody, WY  
Elko, NV  
Fresno, CA  
Grand Junction, CO  
Great Falls, MT  
Helena, MT  
Idaho Falls, ID  
Jackson Hole, WY  
Kalispell, MT  
Missoula, MT  
Ontario, CA  
Orange County, CA  
Pasco, WA  
Pocatello, ID  
Portland, OR  
Reno, NV  
Sacramento, CA  
San Jose, CA  
Spokane, WA  
St. George, UT  
Sun Valley, ID  
Twin Falls, ID  
West Yellowstone, MT

**Frontier at Denver**

Albuquerque, NM  
Portland, OR

Note: Community size determined by FAA passenger enplanement statistics, CY1998

Based on roundtrip domestic service, filed minimum connect time, two hour maximum connect time, 30% maximum circuitry

Source: Official Airline Guide, June 2000

**DELTA'S PROPOSAL WILL OFFER IMPROVED DCA SERVICE  
FOR 15 MORE SMALL AND MEDIUM-SIZED COMMUNITIES  
THAN NORTHWEST'S PROPOSAL**

**Delta at Salt Lake City**

Anchorage, AK  
Boise, ID  
Bozeman, MT  
Butte, MT  
Cody, WY  
Elko, NV  
Fresno, CA  
Grand Junction, CO  
Great Falls, MT  
Helena, MT  
Idaho Falls, ID  
Jackson Hole, WY  
Kalispell, MT  
Missoula, MT  
Ontario, CA  
Orange County, CA  
Pasco, WA  
Pocatello, ID  
Portland, OR  
Reno, NV  
Sacramento, CA  
San Jose, CA  
Spokane, WA  
St. George, UT  
Sun Valley, ID  
Twin Falls, ID  
West Yellowstone, MT

**Northwest at Seattle**

\*Anchorage, AK  
\*Bellingham, WA  
\*Eugene, OR  
\*Fairbanks, AK  
\*Juneau, AK  
\*Oakland, CA  
\*Pasco, WA  
\*Port Angeles, WA  
\*Portland, OR  
\*Pullman, WA  
\*Wenatchee, WA  
\*Yakima, WA  
  
\*Operated by Alaska Airlines

Note: Community size determined by FAA passenger enplanement statistics, CY1998

Based on roundtrip domestic service, filed minimum connect time, two hour maximum connect time, 30% maximum circuitry

Source: Official Airline Guide, June 2000

**DELTA'S PROPOSAL WILL PROVIDE MORE CONNECTING SEATS TO DCA  
THAN EIGHT OUT OF NINE APPLICANTS**

**Delta Will Offer More Connecting Seats to DCA  
Than All Four of the Los Angeles Applicants Combined**

America West - Phoenix 5,995,184

**Delta - Salt Lake City 4,373,772**

America West - Las Vegas 2,002,208

United - Los Angeles 1,753,544

Frontier - Denver 1,370,304

Northwest - Seattle 785,876

American - Los Angeles 371,124

National - Las Vegas 555,100

TWA - Los Angeles

ATA - Los Angeles

ATA - San Francisco

**AMERICA WEST DUPLICATES 15 OF 16 NONSTOP TO  
NONSTOP LAS VEGAS DESTINATIONS FROM PHOENIX**

**94% of cities available via Las Vegas will be served via Phoenix**

	<b><u>Roundtrip O&amp;D Via Phoenix</u></b>	<b><u>Roundtrip O&amp;D Via Las Vegas</u></b>
Bakersfield, CA	X	X
Bullhead City, AZ	X	
Burbank, CA	X	
Carlsbad, CA	X	
Eugene, OR	X	
Flagstaff, AZ	X	
Fresno, CA	X	
Ft Huachua, AZ	X	
Lake Havasu, AZ	X	
Las Vegas, NV	X	N/A
Long Beach, CA	X	
Los Angeles, CA	X	X
Monterey, CA	X	
Oakland, CA	X	X
Ontario, CA	X	X
Orange County, CA	X	X
Oxnard/Ventura, CA	X	
Palm Springs, CA	X	X
Phoenix, AZ	N/A	X
Portland, OR	X	X
Prescott, AZ	X	
Reno, NV	X	X
Sacramento, CA	X	X
San Diego, CA	X	X
San Francisco, CA	X	X
San Jose, CA	X	X
San Luis Obispo, CA	X	
Santa Barbara, CA	X	X
Seattle, WA		X
Tucson, AZ	X	X
Yuma, AZ	X	

**AMERICA WEST CAN REACH 100% OF POTENTIAL PHOENIX  
CONNECTING CITIES WITH TWO DAILY ROUNDTRIP DCA FLIGHTS**

DCA-Phoenix Departures

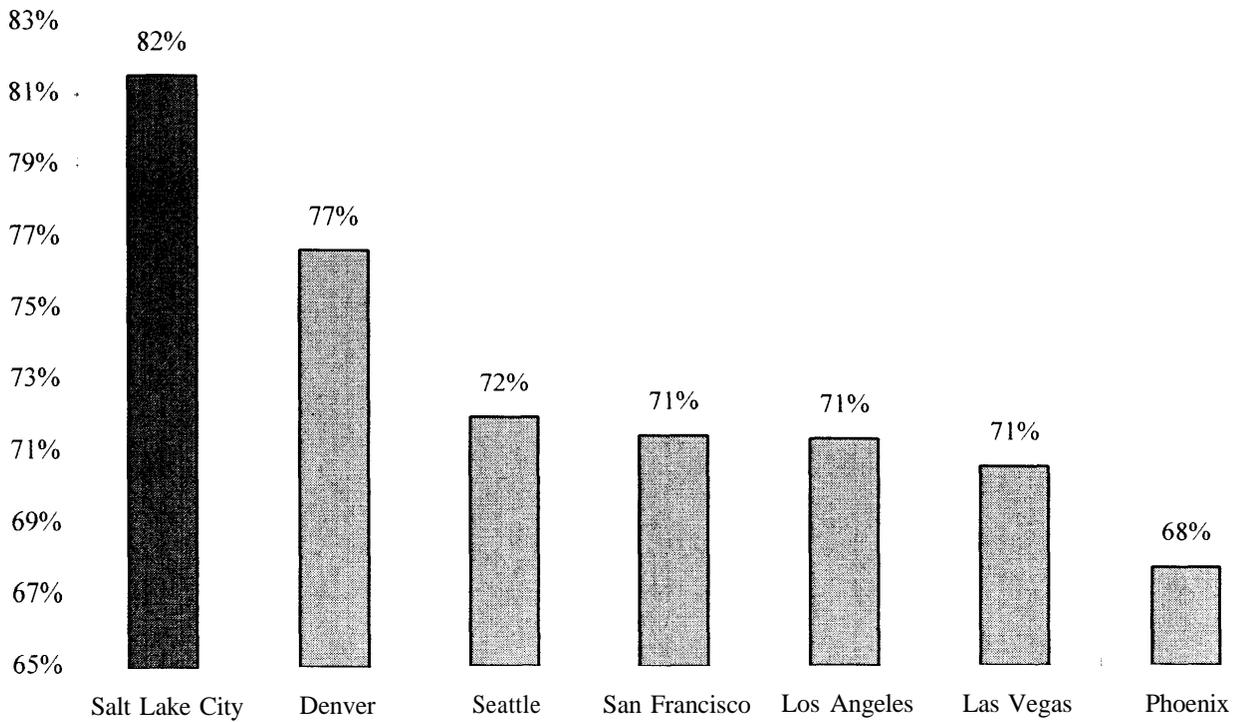
<u>Proposed Departures</u>	Nonstop to <u>Nonstop Cities Served</u>
7:50 AM, 1:19 PM	97%
1:19 PM, 4:18 PM	97%
7:50 AM, 4:18 PM	100%

Phoenix-DCA Departures

<u>Proposed Departures</u>	Nonstop to <u>Nonstop Cities Served</u>
9:24 AM, 12:13 PM	100%
12:13 PM, 2:45 PM	93%
9:24 AM, 2:45 PM	97%

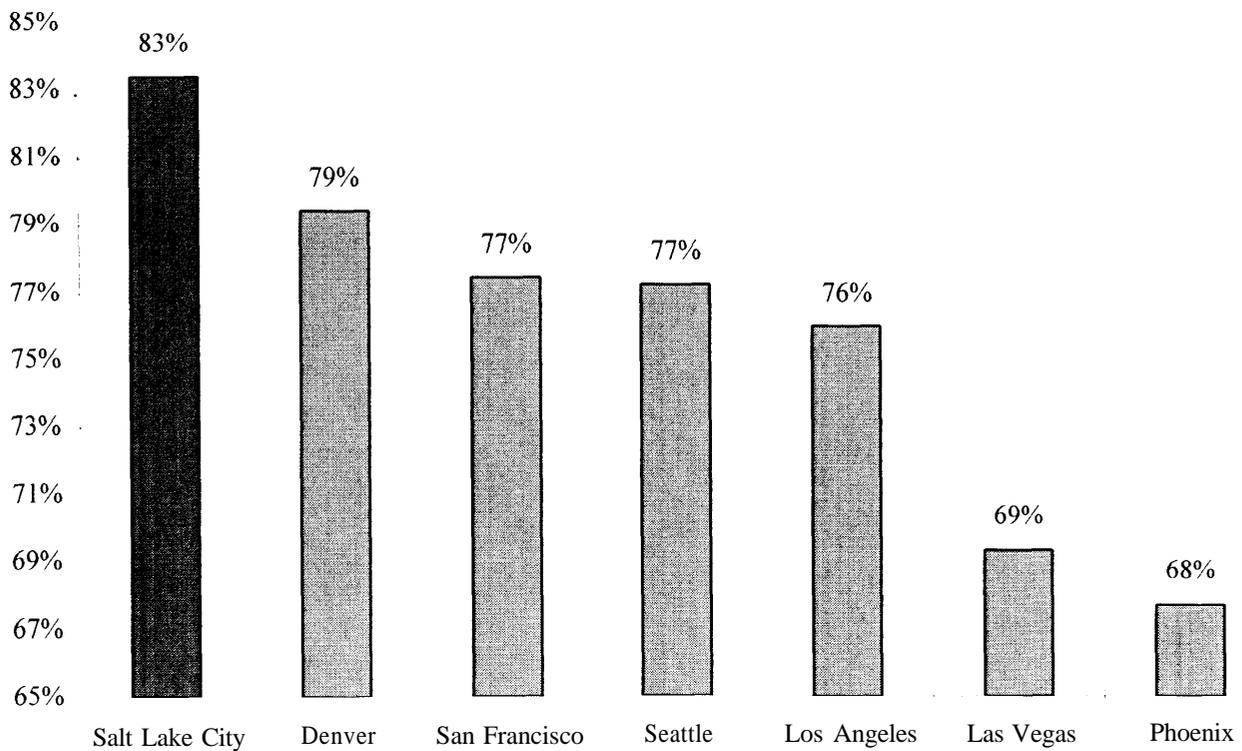
**SALT LAKE CITY HAS THE BEST ON-TIME ARRIVAL PERFORMANCE  
OF ANY APPLICANT HUB**

**On-Time Arrival Percentage by Airport for All Carriers,  
March 2000**



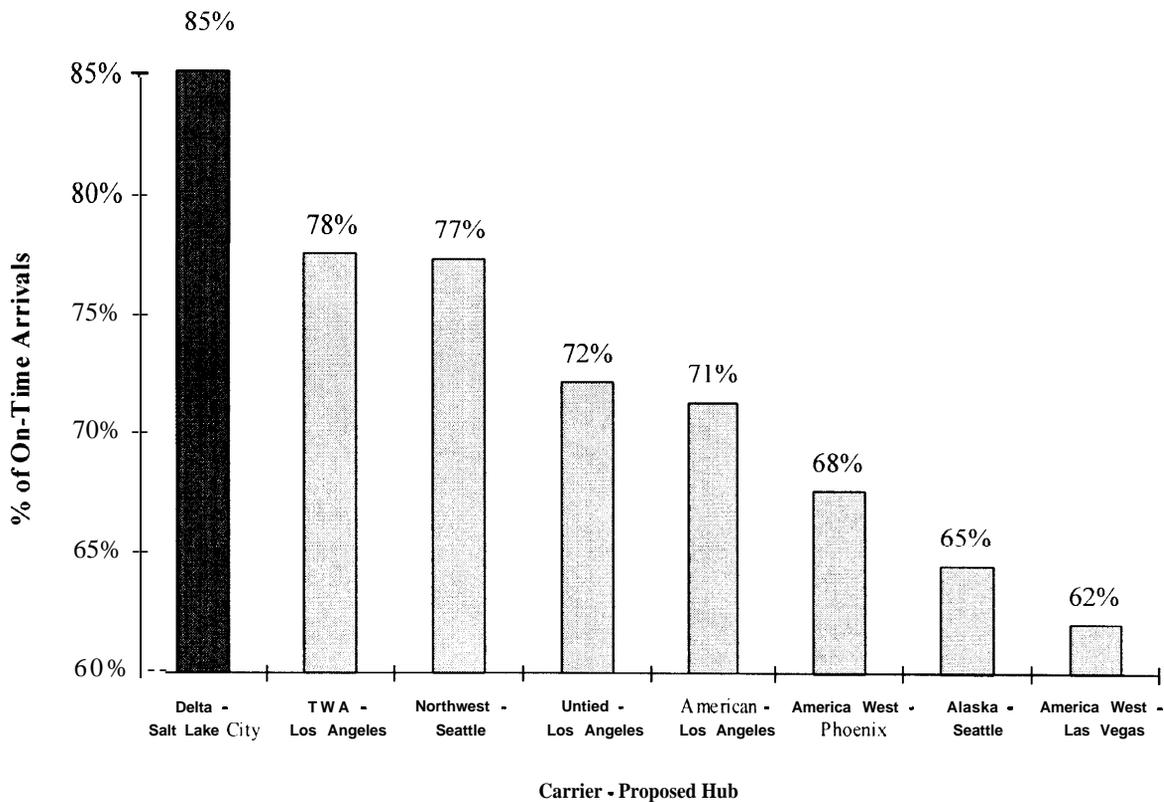
**SALT LAKE CITY HAS THE BEST ON-TIME DEPARTURE PERFORMANCE  
OF ANY APPLICANT HUB**

**On-Time Departure Percentage by Airport for All Carriers,  
March 2000**



**DELTA HAS THE BEST ON-TIME ARRIVAL PERFORMANCE  
AT SALT LAKE CITY COMPARED TO  
ANY OTHER APPLICANT AT ITS PROPOSED HUB**

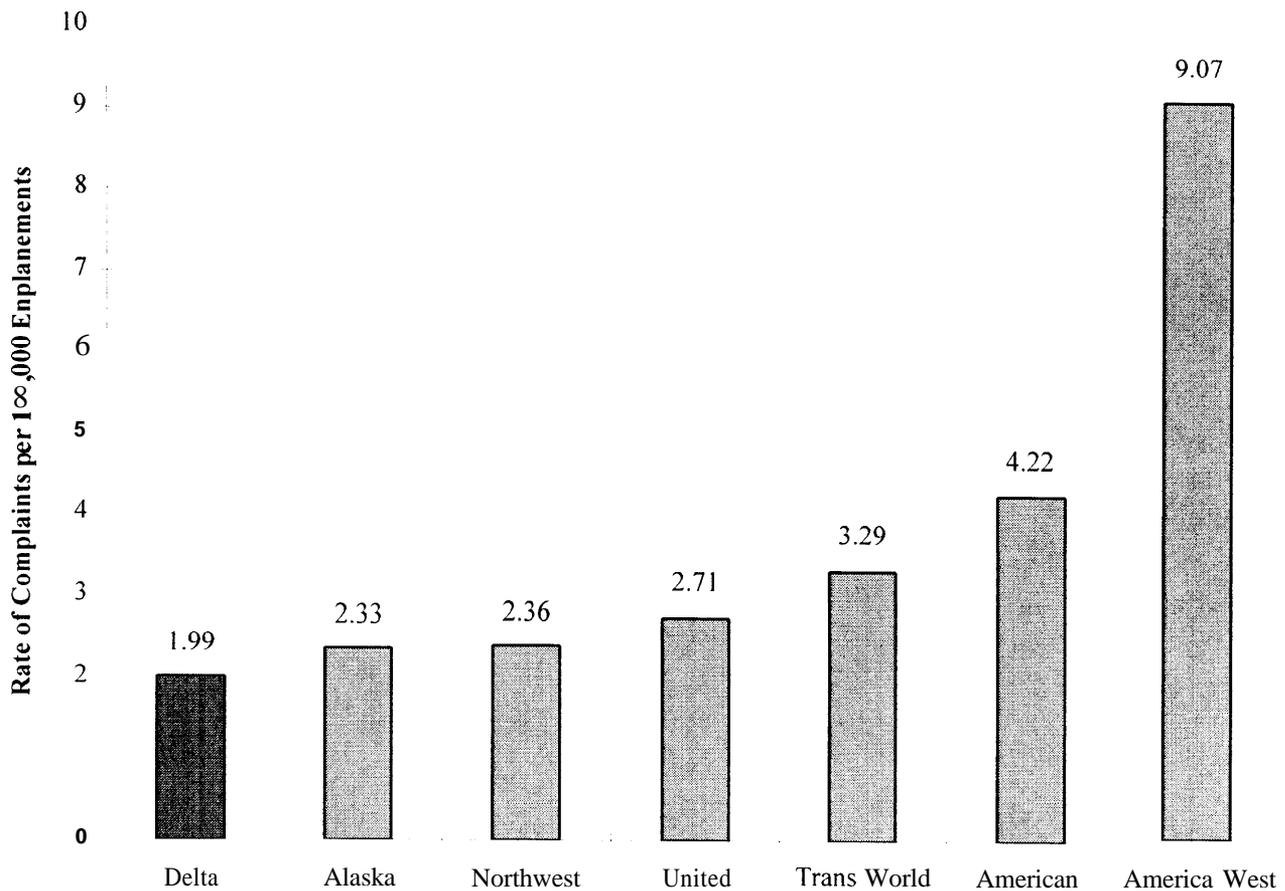
**% of Flights Arriving On-Time by Carrier at Its Proposed Hub**



Note: ATA, Frontier and National are not required to report their on-time statistics to the DOT  
Source: DOT Air Travel Consumer Report, YE March 2000, pp.6-7

**DELTA HAS THE HIGHEST CONSUMER SATISFACTION  
OF ANY APPLICANT**

**Rate of Consumer Complaints per 100,000 Enplanements  
March 2000**



Note: ATA, Frontier and National are not required to report their consumer complaint statistics to the DOT  
Source: DOT Air Travel Consumer Report, YE March 2000, p. 29

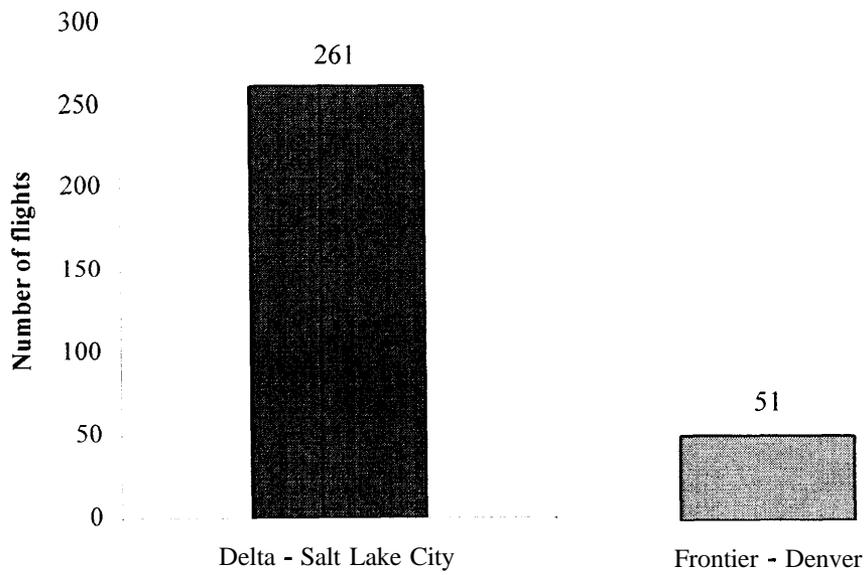
**FRONTIER OFFERS NO NEW FIRST NONSTOP OR FIRST  
COMPETITIVE SERVICE TO CITIES BEYOND THE PERIMETER**

<b><u>DCA To/From</u></b>	<b><u>Current Daily One-Stop Roundtrips</u></b>	<b><u>Carriers Currently Serving Market</u></b>
Albuquerque	38	5
Denver	95	8
Las Vegas	78.5	9
Los Angeles (LAX)	145.5	10
Portland	40.5	6
Phoenix	102	10
San Diego	70.5	7
Seattle	78.5	7
San Francisco	120.5	9
Salt Lake City	41	6

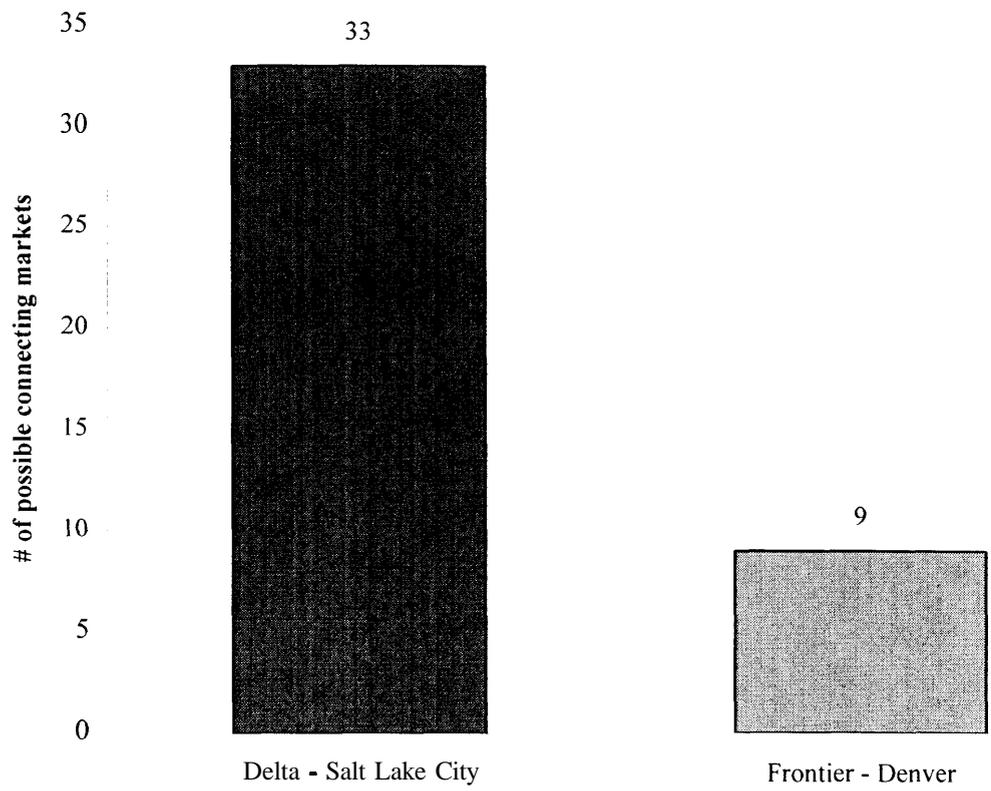
**DELTA'S WILL PROVIDE 35% MORE SEATS  
TO DCA THAN FRONTIER**

<u>Carrier</u>	<u>Equipment</u>	<u>Seats</u>	<u>Annual Seats</u>
<b>Delta</b>	<b>757</b>	<b>183</b>	<b>133,590</b>
Frontier	733	136	99,280

**DELTA'S SALT LAKE CITY HUB OFFERS  
MORE THAN FIVE TIMES THE NUMBER OF FLIGHTS  
THAN FRONTIER'S DENVER HUB**

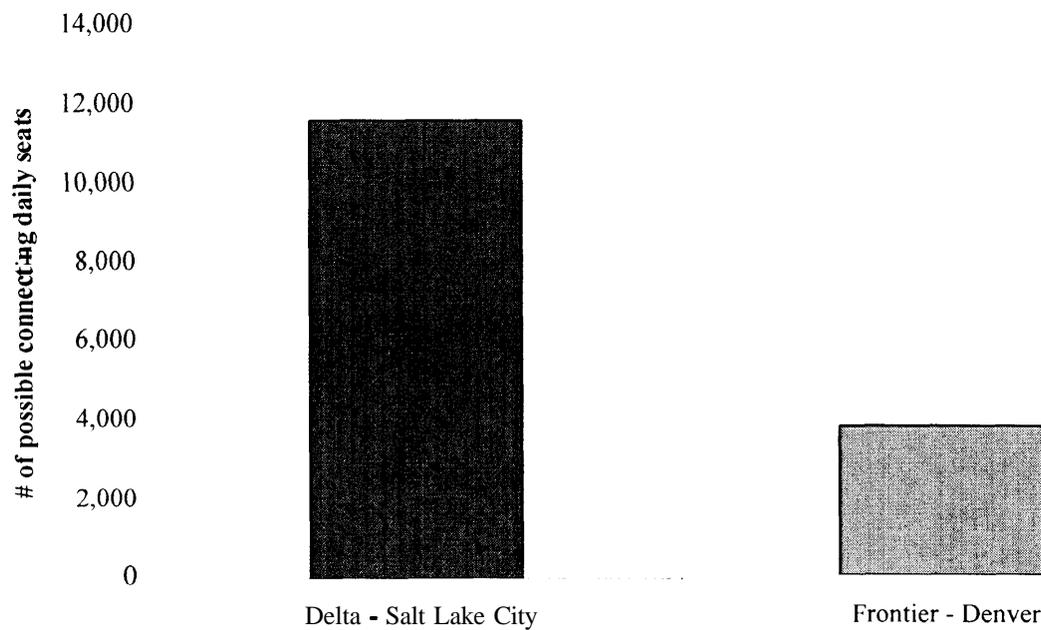


**DELTA'S SALT LAKE CITY HUB OFFERS  
MORE THAN THREE TIMES THE NUMBER OF DCA  
CONNECTING CITIES THAN FRONTIER'S DENVER HUB**



Based on roundtrip domestic service, filed minimum connect time, two hour maximum connect time, 30% maximum circuitry  
Source: Official Airline Guide, June 2000

**DELTA'S SALT LAKE CITY HUB OFFERS  
ALMOST THREE TIMES THE CONNECTING CAPACITY  
OF FRONTIER'S DENVER HUB**



Based on roundtrip domestic service, filed minimum connect time, two hour maximum connect time, 30% maximum circuitry  
Source: Official Airline Guide, June 2000

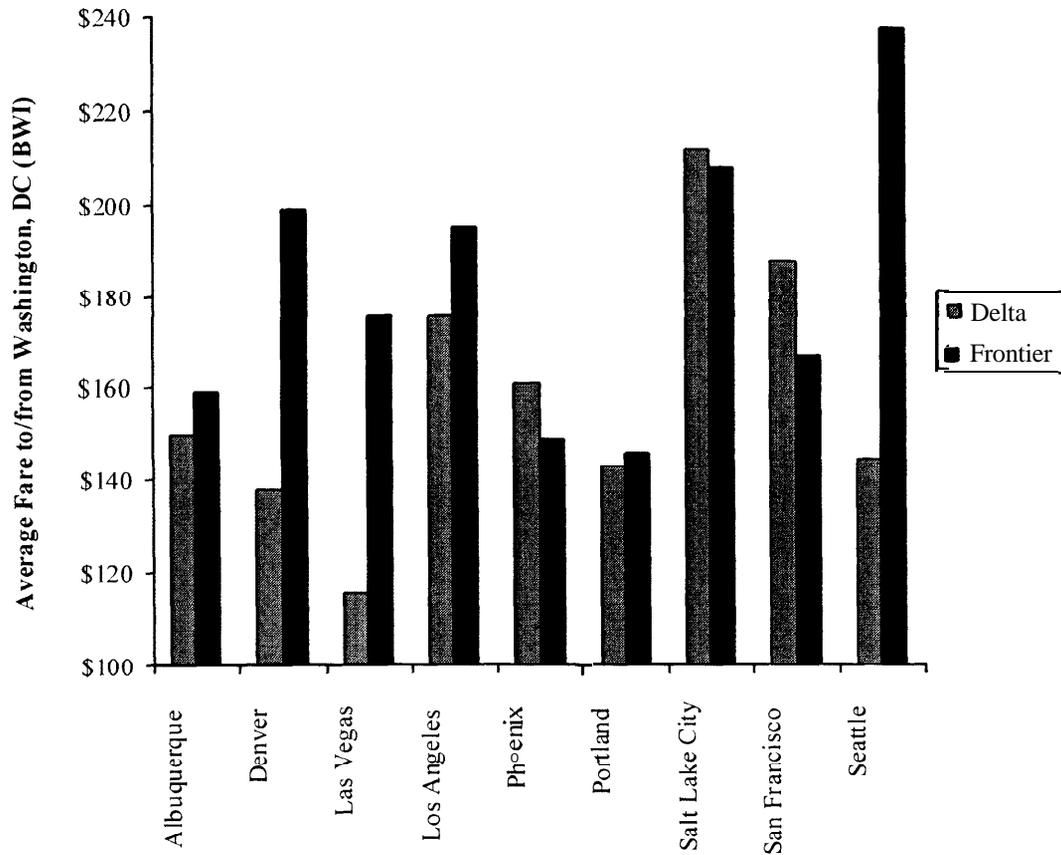
**DELTA'S PUBLISHED FARES TO/FROM WASHINGTON, D.C.  
ARE LESS THAN OR EQUAL TO FRONTIER'S**

**Lowest Roundtrip Fare Between**

<b><u>Washington, DC (BWI) and</u></b>	<b><u>Frontier</u></b>	<b><u>Delta</u></b>
Seattle	396	438
Portland	390	390
Salt Lake City	298	298
Denver	398	428
San Francisco	396	258
Los Angeles (LAX)	396	258
San Diego	392	392
Phoenix	396	258
Las Vegas	396	396
Albuquerque	368	296

**DELTA'S AVERAGE FARES TO/FROM WASHINGTON, D.C.  
ARE LESS THAN FRONTIER'S**

**Delta's average fare to cities west of the perimeter is 22% lower than Frontier's**



**DELTA'S PROPOSAL WILL PROVIDE NEARLY 200% MORE ANNUAL SEATS  
TO DCA THAN NORTHWEST'S PROPOSAL**

<b><u>Carrier</u></b>	<b><u>Equipment</u></b>	<b><u>Seats</u></b>	<b><u># of Proposed Roundtrips</u></b>	<b><u>Annual Seats to DCA</u></b>	<b><u>% Delta Greater Than</u></b>
Delta	757	183	2	133,590	1
Northwest	A319	124	1	45,260	195%

**DELTA'S PROPOSAL WILL PROVIDE NEARLY 50% MORE SEATS  
PER OPERATION TO DCA THAN NORTHWEST'S PROPOSAL**

<b><u>Carrier</u></b>	<b><u>Equipment</u></b>	<b><u>Seats</u></b>	<b><u># of Proposed Roundtrips</u></b>	<b><u>Daily Seats to DCA</u></b>	<b><u>Seats per Operation % Delta Greater Than</u></b>
<b>Delta</b>	<b>757</b>	<b>183</b>	<b>2</b>	<b>366</b>	
Northwest	A319	124	1	124	48%

**FOUR TIMES AS MANY WASHINGTON PASSENGERS  
 FROM CITIES IDENTIFIED IN NORTHWEST'S SEATTLE APPLICATION  
 CAN TRAVEL LESS CIRCUITOUSLY VIA SALT LAKE CITY**

8 1% Of DCA O&D Passengers Can Travel Less Circuitously Via Salt Lake City

	Annual Washington O&D Psgrs.(000)	Circuitry Via Seattle	Circuitry Via Salt Lake City	Less Circuitous Carrier	
1 Anchorage, AK	32,293	12%	18%	NW	
2 Bellingham, WA	1,880	3%		NW	
3 Bend/Redmond, OR	2,170	11%		NW	
4 Billings, MT	13,223	79%	34%		DL
5 Boise, ID	21,438	33%	5%		DL
6 Bozeman, MT	10,915	59%	22%		DL
7 Burbank, CA	5,737	42%		NW	
8 Butte, MT	1,468	50%	19%		DL
9 Eugene, OR	10,195	7%		NW	
10 Fairbanks, AK	3,327	17%		NW	
11 Fresno, CA	14,554	32%	1%		DL
12 Great Falls, MT	6,103	56%	27%		DL
13 Helena, MT	5,005	53%	22%		DL
14 Honolulu, Oahu, HI	107,310	3%		NW	
15 Juneau, AK	372	13%		NW	
16 Kalispell, MT	5,404	38%	22%		DL
17 Ketchikan, AK	214	10%		NW	
18 Las Vegas, NV	139,109	53%	6%		DL
19 Lewiston, ID	170	24%		NW	
20 Medford, OR	5,647	12%		NW	
21 Missoula, MT	9,680	40%	18%		DL
22 Moses Lake, WA	0	13%		NW	
23 Oakland, CA	35,174	23%		NW	
24 Ontario, CA	57,366	45%	6%		DL
25 Pasco/Kennewick, WA	11,842	14%	8%		DL
26 Phoenix, AZ	163,849	73%	19%		DL
27 Port Angeles, WA	147	1%		NW	
28 Portland, OR	108,964	4%	6%	NW	
29 Pullman/Moscow, ID	220	24%		NW	
30 Reno, NV	33,961	27%	0%		DL
31 Sacramento, CA	75,908	23%	0%		DL
32 San Francisco, CA	588,513	23%	0%		DL
33 San Jose, CA	133,083	25%	0%		DL
34 Sitka, AK	64	11%		NW	
35 Spokane, WA	18,441	21%	14%		DL
36 Sun Valley, ID	1,607	43%	6%		DL
37 Walla Walla, WA	49	18%		NW	
38 Wenatchee, WA	183	9%		NW	
39 Yakima, WA	<u>1,685</u>	8%		NW	
	1,627,270				

	Northwest	Delta
<b>Washington O&amp;D Passengers</b>		
<b>By Less Circuitous Carrier</b>	315,801	1,311,469
<b>Percent Of Total Passengers</b>	19%	81%

Washington, D.C. defined as DCA, IAD

**NATIONAL'S ONLY TWO CONNECTING CITIES ALREADY RECEIVE  
THE MOST NONSTOP TO NONSTOP DCA CONNECTING SERVICE**

<b>Rank</b>	<b><u>DCA To/From</u></b>	<b>Current Daily</b>
		<b><u>One-Stop Roundtrips</u></b>
1	Los Angeles	145.5
2	San Francisco	120.5
3	Dallas/Fort Worth	118
4	Minneapolis	110.5
5	Phoenix	102
6	Houston	98.5
7	Boston	98.5
8	Denver	95
9	Kansas City	85
10	Seattle	78.5
11	Las Vegas	78.5
12	New Orleans	77.5
13	San Diego	70.5
14	Orlando	70.5
15	Indianapolis	66.5
16	Detroit	66
17	Chicago	65
18	Pittsburgh	65
19	Austin	65
20	Tampa	63.5

**LETTERS OF CIVIC AND  
GOVERNMENTAL SUPPORT**

**Congress of the United States**  
**House of Representatives**  
**Washington, DC 20515**

May 12, 2000

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

Dear Secretary Slater:

**We are writing in support of Delta Air Lines' application for four slot exemptions to serve Salt Lake City from Ronald Reagan Washington National Airport @CA).**

**Delta Air Lines has proposed two daily nonstop round-trip flights between Ronald Reagan Washington National Airport and Salt Lake City, Utah using four of the twelve slot exemptions for service beyond the DCA perimeter created under the "Wendell H. Ford Aviation Investment and Reform Act for the 21st Century."**

As you know, this legislation directs the Department to grant twelve slot exemptions "to air carriers to operate limited frequencies and aircraft on select routes between Ronald Reagan Washington National Airport and domestic hub airports" located beyond the DCA perimeter (i.e., more than 1,250 statute miles from DCA). Delta's application for four slot exemptions to operate two daily nonstop round-trip flights between Salt Lake City and DCA is fully consistent with each of the exemption criterion approved by Congress.

Salt Lake City and the dozens of small and medium-sized communities that enjoy nonstop service to Salt Lake City have long been deprived of convenient and competitive access to Ronald Reagan Washington National Airport due to the artificial restriction imposed by the perimeter rule. Delta's application offers the Department the opportunity to immediately correct this service deficiency. Delta's proposal will maximize the use of these limited statutory exemptions by allowing nonstop service to Delta's Salt Lake City hub, one of the major network hubs located in the western United States, which will benefit numerous small and mid-sized communities throughout the intermountain west and across the Northern tier of states.

As a major hub, Salt Lake City is ideally situated to serve as a gateway to DCA for many western US. communities. Salt Lake City is the only airline hub located in the intermountain west and is Delta's primary western hub. Delta's proposed two daily flights between DCA and Salt Lake City will enhance online travel options to and from DCA for dozens of small and medium-sized communities throughout the western United States. Moreover, Delta's proposed service will increase competition in multiple markets located throughout the western United States, provide highly sought-after nonstop service for business and leisure passengers traveling between Salt Lake City and DCA, as well as provide convenient single connection online jet service to 65 cities located in the western United States.

May 12, 2000  
Page 2

We urge you grant Delta's application and thereby ensure that communities throughout the western United States receive improved access to DCA. Delta's proposal will result in the optimal use of this valuable new opportunity.

Thank you for your time and consideration.

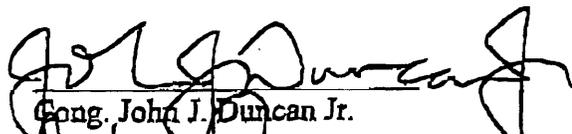
Sincerely yours,

  
Cong. James V. Hansen

  
Cong. Doc Hastings

  
Cong. Buck McKeon

  
Cong. Helen Chenoweth-Hage

  
Cong. John J. Duncan Jr.

  
Cong. Mike Simpson

  
Cong. George R. Nethercutt

  
Cong. Jim Gibbons

  
Cong. Rick Hill

  
Cong. Don Young

  
Cong. Merrill Cook

  
Cong. Ron Packard

  
Cong. Barbara Cubin

  
Cong. Chris Cannon



**MICHAEL O. LEAVITT**  
GOVERNOR

**STATE OF UTAH**  
OFFICE OF THE GOVERNOR  
SALT LAKE CITY  
84114-0601

**OLENE S. WALKER**  
LIEUTENANT GOVERNOR

May 18, 2000

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

**Dear Secretary Slater:**

I am writing in support of Delta Air Lines' application for four slot exemptions to serve Salt Lake City from Ronald Reagan Washington National Airport (DCA).

Delta Air Lines has proposed two daily nonstop round-trip flights between DCA and Salt Lake City, Utah, using four of the twelve slot exemptions for service beyond the DCA perimeter created under the "Wendell H. Ford Aviation Investment and Reform Act for the 21<sup>st</sup> Century."

As you know, this legislation directs the Department to grant twelve slot exemptions "to air carriers to operate limited frequencies and aircraft on select routes between DCA and domestic hub airports" located beyond the DCA perimeter (i.e. more than 1,250 statute miles from DCA). Delta's application for four slot exemptions to operate two daily nonstop round-trip flights between Salt Lake City and DCA is fully consistent with each of the exemption criterion approved by Congress.

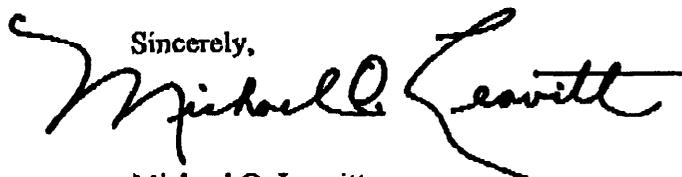
Salt Lake City and the dozens of small and medium-sized communities that enjoy nonstop service to Salt Lake City have long been deprived of convenient and competitive access to DCA due to the artificial restriction imposed by the perimeter rule. Delta's application offers the Department the opportunity to immediately correct this service deficiency. Delta's proposal will maximize the use of these limited statutory exemptions by allowing nonstop service to Delta's Salt Lake City hub, one of the major network hubs located in the western United States, which will benefit numerous small and mid-sized communities throughout the intermountain west and across the northern tier of states.

**As a major hub, Salt Lake City is ideally situated to serve as a gateway to DCA for many western U.S. communities. Salt Lake City is the only airline hub located in the intermountain west and is Delta's primary western hub. Delta's proposed two daily flights between DCA and Salt Lake City will enhance online travel options to and from DCA. Moreover, Delta's proposed service will increase competition in multiple markets located throughout the western U.S., provide highly sought-after nonstop service for business and leisure passengers traveling between Salt Lake City and DCA, as well as provide convenient single connection online jet service to 65 cities located in the western United States.**

**I urge you to grant Delta's application and thereby ensure that communities throughout the western United States receive improved access to DCA. Delta's proposal will result in the optimal use of this valuable new opportunity.**

Thank you for your consideration.

Sincerely,

A handwritten signature in black ink that reads "Michael O. Leavitt". The signature is fluid and cursive, with a large, sweeping flourish at the end.

Michael O. Leavitt  
Governor

MOL:cs

# **SALT LAKE CITY CORPORATION**

OFFICE OF THE MAYOR

May 16, 2000

**The Honorable Rodney E. Slater  
Secretary, U. S. Department of Transportation  
400 Seventh Street, SW  
Washington, DC 20590**

**Dear Secretary Slater:**

**I am writing in support of Delta Air Lines' application for four slot exemptions to serve Salt Lake City from Ronald Reagan Washington National Airport (DCA).**

**Delta Air Lines has proposed two daily nonstop round-trip flights between DCA and Salt Lake City, Utah using four of the twelve slot exemptions for service beyond the DCA perimeter created under the "Wendell H. Ford Aviation Investment and Reform Act for the 21<sup>st</sup> Century."**

**As you know, this legislation directs the Department to grant twelve slot exemptions "to air carriers to operate limited frequencies and aircraft on select routes between DCA and domestic hub airports" located beyond the DCA perimeter (i.e., more than 1,250 statute miles from DCA). Delta's application for four slot exemptions to operate two daily nonstop round-trip flights between Salt Lake City and DCA is fully consistent with each of the exemption criteria approved by Congress.**

**Salt Lake City, and the dozen of small and medium-sized communities that enjoy nonstop service to Salt Lake City, have long been deprived of convenient and competitive access to DCA due to the artificial restriction imposed by the perimeter rule. Delta's application offers the Department the opportunity to immediately correct this service deficiency. Delta's proposal will maximize the use of these limited statutory exemptions by allowing nonstop service to Delta's Salt Lake City hub, one of the major network hubs located in the western United States, which will benefit numerous small and mid-size communities throughout the Intermountain West and across the northern tier of states.**

**The Honorable Rodney E. Slater**

**May 16, 2000**

**Page 2**

**AS a major hub, Salt Lake City is ideally situated to serve as a gateway to DCA for many western U.S. communities. Salt Lake City is the Only airline hub located in the intermountain west and is Delta's primary western hub. Delta's proposed two daily flights between DCA and Salt Lake City will enhance online travel options to and from DCA for dozens of small and medium-sized communities throughout the western United States. Moreover, Delta's proposed service will increase competition in multiple markets located throughout the western United States, provide highly sought-after nonstop service for business and leisure passengers traveling between Salt Lake City and DCA, and provide convenient single connection online jet service to 65 cities located in the western United States.**

**I urge you to grant Delta's application and thereby ensure that communities throughout the western United States receive improved access to DCA. Delta's proposal will result in the optimal use of this valuable new opportunity.**

**Thank you for your consideration.**

**Sincerely,**

A large, bold, handwritten signature in black ink, appearing to read "R. Slater", is written over a large, stylized graphic of the letters "i & 7". The "i" is lowercase and the "7" is uppercase. The ampersand is also stylized.

**Mayor**



STATE OF WYOMING  
OFFICE OF THE GOVERNOR

JIM GERINGER  
GOVERNOR

STATE CAPITOL  
CHEYENNE, WY 82002

May 19, 2000

The Honorable **Rodney Slater**  
Secretary of Transportation  
U. S. Department of Transportation  
Washington, D.C. 20590

Dear Mr. Secretary:

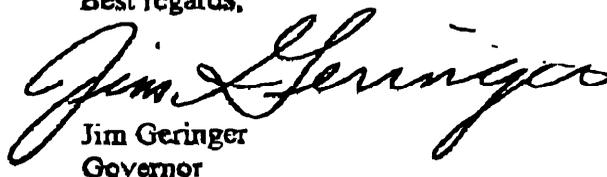
I am writing in support of Delta Air Lines' application for four slot exemptions to serve Salt Lake City from Ronald Reagan Washington National Airport (DCA).

Delta has proposed two daily nonstop round-trip flights between DCA and Salt Lake City, Utah using four of the twelve slot exemptions for service beyond the DCA perimeter created under the "Wendall H. Ford Aviation Investment and Reform Act for the 21<sup>st</sup> Century."

In June of 1999, the Western Governors' Association adopted their policy resolution (#99-005), "Air Service to Ronald Reagan Washington National Airport." This resolution stated that Congress should move to create fair and equal access to DCA from the Western United States by enacting legislation (S. 82, H.R. 1507) to permit exemptions to the perimeter rule. Such legislation would bring new nonstop or single-connection service, increased competition and consumer benefits to virtually all Western markets and the Greater Washington, DC. area. Every objective source has found restricted access to airports in the form of slot controls and perimeter rule restrictions to be barriers to entry in the airline business. These barriers to competition cause economic disadvantages for Western states, and result in higher consumer fares than are necessary. Slot provisions and perimeter rules should be modified to permit improved air service to communities in the West.

Thank you for your consideration on this important matter.

Best regards,



Jim Geringer  
Governor

cc: A, Doyle Cloud, Jr., FDX Corp.  
G:\GOV99-00\WBC\MISC\Slater.doc



# UTAH STATE SENATE

319 STATE CAPITOL • SALT LAKE CITY, UTAH 84114  
(801) 538-1035 • FAX (801) 538-1414

SENATOR  
**LYLE WHILLYARD**  
MAJORITY LEADER

TWENTY-FIFTH DISTRICT  
CACHIE, RICH and  
SUMMIT COUNTIES

175 E. FIRST NORTH  
LOGAN, UT 84321  
(H) (435) 752-9043  
(O) (435) 752-2610  
FAX (435) 752-8895



APPROPRIATIONS SUBCOMMITTEES  
Executive Appropriations  
Commercial Revenue  
Public Education  
STANDING COMMITTEES  
Human Services  
Judiciary

May 9, 2000

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

Dear Secretary Slater:

I am writing in support of Delta Air Lines' application for four slot exemptions to serve Salt Lake City from Ronald Reagan Washington National Airport (DCA).

Delta Air Lines has proposed two daily nonstop round-trip flights between DCA and Salt Lake City, Utah using four of the twelve slot exemptions for service beyond the DCA perimeter created under the "Wendell H. Ford Aviation Investment and Reform Act for the 21st Century."

As you know, this legislation directs the Department to grant twelve slot exemptions "to air carriers to operate limited frequencies and aircraft on select routes between DCA and domestic hub airports" located beyond the DCA perimeter (i.e., more than 1,250 statute miles from DCA). Delta's application for four slot exemptions to operate two daily nonstop round-trip flights between Salt Lake City and DCA is fully consistent with each of the exemption criterion approved by Congress.

Salt Lake City and the dozens of small and medium-sized communities that enjoy nonstop service to Salt Lake City have long been deprived of convenient and competitive access DCA due to the artificial restriction imposed by the perimeter rule. Delta's application offers the Department the opportunity to immediately correct this service deficiency. Delta's proposal will maximize the use of these limited statutory exemptions by allowing nonstop service to Delta's Salt Lake City hub, one of the major network hubs located in the Western United States, which

The Honorable Rodney E. Slater  
May 9, 2000  
Page 2

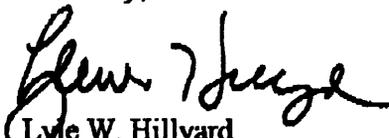
**will benefit numerous** small and mid-sized communities **throughout the intermountain west and across the Northern tier of States.**

As a major hub, Salt Lake City is ideally situated to serve as a gateway to DCA for many western U.S. communities. Salt Lake City is ideally situated to serve as a gateway to DCA for many western U.S. communities. Salt Lake City is the only airline hub located in the intermountain west and is Delta's primary western hub. Delta's proposed two daily flights between DCA and Salt Lake City will enhance online travel options to and from DCA for dozens of small and medium-sized communities throughout the western United States. Moreover, Delta's proposed service will increase competition in multiple markets located throughout the western United States, provided highly sought-after nonstop service for business and leisure passengers traveling between Salt Lake City and DCA, as well as provide convenient single connection online jet service to 65 cities located in the western United States.

I urge you to grant Delta's application and thereby ensure that communities throughout the western United States receive improved access to DCA. Delta's proposal will result in the optimal use of this valuable new opportunity.

Thank you for your consideration.

Sincerely,

  
Lyle W. Hillyard  
Utah State Senator,  
25<sup>th</sup> District

LWH/bb

# UTAH STATE SENATE

319 STATE CAPITOL - SALT LAKE CITY, UTAH 84114  
(801) 538-1035 • FAX (801) 538-1414

SENATOR  
RON ALLEN

THIRTEENTH DISTRICT  
SALT LAKE and TOOELE COUNTIES

855 LAKEVIEW  
STANBURY PARK, UT 84074  
(801) 433-8822 FAX 3535  
(0) (801) 977-0100



APPROPRIATIONS SUBCOMMITTEE  
Public Education  
STANDING COMMITTEES  
Education  
Revenue & Taxation

The Honorable Rodney E. Slater  
Secretary – U.S. Department of Transportation  
400 Seventh St., SW  
Washington, D.C. 20590

May 9, 2000

Dear Secretary Slater,

I am writing in support of Delta Air Lines' application for four slot exemptions to serve Salt Lake City from Ronald Reagan Washington National Airport (DCA).

Delta Air Lines has proposed two daily nonstop round-trip flights between DCA and Salt Lake City, Utah using four of the twelve slot exemptions for services beyond the DCA perimeter created under the "Wendell H. Ford Aviation Investment and Reform Act for the 21<sup>st</sup> Century,"

As you know, this legislation directs the Department to grant twelve slot exemptions "to air carriers to operate limited frequencies and aircraft on select routes between DCA and domestic hub airports" located beyond the DCA perimeter (i.e., more than 1,250 statute miles from DCA). Delta's application for four slot exemptions to operate two daily nonstop round-trip flights between Salt Lake City and DCA is fully consistent with each of the exemption criterion by Congress.

As a major hub, Salt Lake City is ideally situated to serve as a gateway to DCA for many western U.S. communities. Salt Lake City is the only airline hub located in the intermountain west and is Delta's primary western hub. Delta's proposed two daily flights between DCA and Salt Lake City will enhance DCA travel options for dozens of communities throughout the western United States.

I urge you grant Delta's application and thus ensure that communities throughout the western United States receive access to DCA consistent with other US travelers.

Sincerely,

Ron Allen  
Utah State Senator

**UTAH STATE SENATE**319 STATE CAPITOL • SALT LAKE CITY, UTAH 84114  
(801) 538-1035 • FAX (801) 538-1414SENATOR  
**JOHN L. VALENTINE**FOURTEENTH DISTRICT  
UTAH COUNTY857 E. 970 N.  
OREM, UT 84097  
(H) (801) 224-1693  
(O) (801) 373-6345  
FAX (801) 377-4991  
E-mail: jvalenti@le.state.ut.us
**APPROPRIATIONS SUBCOMMITTEE**  
 Executive Appropriations, Vice-Chair  
 Public Education  
**STANDING COMMITTEES**  
 Revenue & Taxation, Chair  
 Judiciary

May 10, 2000

The Honorable **Rodney Slater**  
**Secretary U. S. Department**  
 of Transportation  
 407th street, S.W.  
 Washington, D.C. 20590

Dear Secretary **Slater**:

I am writing in support of Delta Airlines' application for four slot exemptions to **serve Salt Lake City from Ronald Reagan Washington National Airport (DCA)**.

It is my **understanding** that Delta **Airlines has** proposed two daily non-stop rod-tip **flights between DCA and Salt Lake City, Utah, using four of the 12 slot exemptions** for service beyond the **DCA** perimeter created under a federal act.

Salt Lake City and dozens of small and medium-size **communities** that enjoy non-stop service to Salt Lake City have **been** deprived of convenient and competitive access to Reagan National under the **present situation. It imposes an artificial restriction; Delta's application offers the Department** the opportunity to correct this service deficiency.

As a major hub, Salt Lake City is ideally situated to serve as a gateway to Washington, **D.C.** through **Reagan National Airport. Delta is the primary western hub for Salt Lake City.** It serves **as a connection service for 65** cities located in the western United States.

**I urge you to** grant Delta's application for improved access into Ronald Reagan Washington National Airport.

Thank you for your consideration.

Sincerely,

**John L. Valentine**  
 Senator, District 14



# State of Utah

DEPARTMENT OF COMMUNITY  
AND ECONOMIC DEVELOPMENT

MICHAEL O. LEAVITT  
Governor

DAVID B. WINDER  
Executive Director

RICHARD J. BRADFORD  
Deputy Director

April 5, 2000

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

**RE: Delta Airline's application to fly non-stop between Salt Lake  
City and Ronald Reagan National Airport Washington D.C.**

Dear Secretary Slater,

On behalf of the State of Utah, we urge you to approve Delta's application to operate two daily round-trip non-stop flights between Salt Lake City and Ronald Reagan National Airport, Washington D.C.

One of the major hubs in the western United States is Delta in Salt Lake City. Approval of this new service would provide over 40 cities in the West with new one-stop online service to Reagan National. Ten of these communities would be receiving their very first such service.

Citizens of Utah would benefit from this non-stop service. We have a great deal of traffic to Washington D.C. and this would greatly increase their travel convenience.

Sincerely,

David B. Winder  
Executive Director

# SALT LAKE CITY CORPORATION

OFFICE OF THE CITY COUNCIL

May 15, 2000

The Honorable Rodney E. Slater  
Secretary of Transportation  
U.S. Department of Transportation  
400 Seventh Street, SW  
Washington, DC 20590

Post-It® Fax Note	7671	Date	5/18/00	# of pages	2
To	LARRY EPPS	From	SLC Council		
Co./Dept.		Co.	JAN (201)		
Phone #		Phone #	535-7600		
Fax #	(404) 715-4779	Fax #			

Dear Secretary Slater:

The Salt Lake City Council is writing this letter in support of Delta Air Lines' application for four slot exemptions to serve Salt Lake City from Ronald Reagan Washington National Airport.

As you know from your helpful and appreciated visits to Salt Lake City on other matters, Salt Lake City International Airport provides service to cities throughout the Intermountain West. Delta Air Lines has proposed two daily nonstop round-trip flights between Ronald Reagan Airport and Salt Lake City using four of 12 slot exemptions created under the *Wendell H. Ford Aviation Investment and Reform Act for the 21<sup>st</sup> Century*.

The City Council supports Delta Air Lines' proposal for several reasons.

First, adding the two daily round-trip flights greatly would improve service by providing single connection online jet service to passengers from 65 cities in the western United States. Many of those cities are small and mid-sized communities whose residents, under current restrictions involving Ronald Reagan Airport, have to make two or three connecting flights to reach Ronald Reagan Airport.

Second, Salt Lake City is the only major airline hub in the Intermountain West. Its location would allow it to serve as a gateway to Washington, DC, for many airline passengers throughout the West, if the federal government awards Delta Air Lines the two round-trip flights. You may know that Delta Air Lines has increased its number regional jet flights to Salt Lake City International to improve service for airline passengers. Connecting those passengers to Washington, DC, with nonstop flights would greatly enhance passengers' ease of travel.

Third, Delta Air Lines' proposal would increase competition in multiple markets throughout the West.

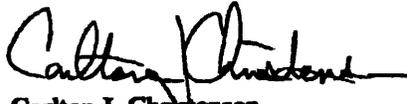
Finally, Salt Lake City is Delta's primary western hub. As one of the nation's largest air carriers, Delta is in a unique position to serve passengers in the western United States because of its location in Salt Lake City. From the City Council's perspective, Delta Air Lines has demonstrated a long-term commitment to the City and people living in the West. The City Council expects that commitment to continue far into the future, and any way Delta Air Lines can improve its service to residents in the West warrants the City Council's support.

We hope you will consider these reasons in reviewing Delta Air Lines' application for daily nonstop service between Ronald Reagan Airport and Salt Lake City. We believe Delta's

proposal would benefit people throughout the West, not only the air carrier or Salt Lake City International Airport.

Again, thank you for your past efforts to improve transportation in Utah, and we look forward to working with you in the future.

Sincerely,



Carlton J. Christensen  
City Council Chair

CJC/raw

Cc: City Council Members

Mayor Ross C. Anderson

Danny K. Quillen, Delta Air Lines

Mary Kay Griffith, Chair, Airport Board

Tom Troske, Acting Director of Airports

Senator Orrin Hatch

Senator Robert Bennett

Representative Merrill Cook

Representative Chris Cannon

Representative James Hanson

Governor Michael Leavitt

Senator John Valentine

May 11, 2000

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



Dear **Secretary Slater**:

JOHN TALBOTT, MAYOR

I am writing in support of **Delta Air Lines'** application for four slot exemptions to serve Salt Lake City from Ronald **Reagan** Washington National Airport (DCA).

**Delta Air Lines** has proposed two daily nonstop round-trip flights between DCA and Salt Lake City, Utah using four of the twelve slot exemptions for service beyond the DCA perimeter created under the "Wendell H. Ford Aviation Investment and Reform Act for the 21<sup>st</sup> Century."

As you know, this legislation directs the Department to grant twelve slot exemptions "to air carriers to operate limited frequencies and aircraft on select routes between DCA and domestic hub airports" located beyond the DCA perimeter (i.e., more than 1,250 statute miles from DCA). Delta's application for four slot exemptions to operate two daily nonstop round-trip flights between Salt Lake City and DCA is fully consistent with each of the exemption criterion approved by Congress.

Salt Lake City and the dozens of small and medium-sized communities that enjoy nonstop service to Salt Lake City have long been deprived of convenient and competitive access DCA due to the artificial restriction imposed by the perimeter rule. Delta's application offers the Department the opportunity to immediately correct this service deficiency. Delta's proposal will maximize the use of these limited statutory exemptions by allowing nonstop service to Delta's Salt Lake City hub, one of the major network hubs located in the western United States, which will benefit numerous small and mid-sized communities throughout the intermountain west and across the Northern tier of states.

As a major hub, Salt Lake City is ideally situated to serve as a gateway to DCA for many western U.S. communities. Salt Lake City is the only airline hub located in the intermountain west and is Delta's primary western hub. Delta's proposed two daily flights between DCA and Salt Lake City will enhance online travel options to and from DCA for dozens of small and medium-sized communities throughout the western United States. Moreover, Delta's proposed service will increase competition in multiple markets located throughout the western United States, provide highly sought-after nonstop service for business and leisure passengers traveling between Salt Lake City and DCA, as well as provide convenient single connection online jet service to 65 cities located in the western United States,

The Honorable Rodney F. Slater  
May 11, 2000  
Page Two

I urge you to grant Delta's application and thereby ensuring that communities throughout the western United States receive improved access to DCA. Delta's proposal will result in the optimal use of this valuable new opportunity.

Thank you for your consideration.

Sincerely,

  
JOHN TALBOTT  
Mayor  
City of Spokane



# CITY OF BILLINGS

CHARLES F. TOOLEY, MAYOR

P.O. BOX 1178  
BILLINGS, MONTANA 59109  
(406) 657-8298  
FAX (406) 657-8390



May 10, 2000

The Honorable Rodney E. Slater  
secretary - U. S. Department of Transportation  
400 Seventh Street, SW  
Washington, D.C. 20590

Dear Secretary Slater:

I am writing in support of Delta Air Lines' application for four slot exemptions to serve Salt Lake City from Ronald Reagan Washington National Airport (DCA).

Delta Air Lines has proposed two daily nonstop round-trip flights between DCA and Salt Lake City, Utah using four of the twelve slot exemptions for service beyond the DCA perimeter created under the "Wendell H. Ford Aviation Investment and Reform Act for the 21st Century."

As you know, this legislation directs the Department to grant twelve slot exemptions "to air carriers to operate limited frequencies and aircraft on select routes between DCA and domestic hub airports" located beyond the DCA perimeter (i.e., more than 1,250 statute miles from DCA). Delta's application for four slot exemptions to operate two daily nonstop round-trip flights between Salt Lake City and DCA is fully consistent with each of the exemption criterion approved by Congress.

Salt Lake City and the dozens of small and medium-sized communities that enjoy nonstop service to Salt Lake City have long been deprived of convenient and competitive access DCA due to the artificial restriction imposed by the perimeter rule. Delta's application offers the Department the opportunity to immediately correct this service deficiency. Delta's proposal will maximize the use of these limited statutory exemptions by allowing nonstop service to Delta's Salt Lake City hub, one of the major network hubs located in the western United States, which will benefit numerous small and mid-sized communities throughout the intermountain west and across the Northern tier of states.

As a major hub, Salt Lake City is ideally situated to serve as a gateway to DCA for many western U.S. communities. Salt Lake City is the only airline hub located



H. BRENT COLES  
MAYOR

May 16, 2000

OFFICE OF THE MAYOR

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

Dear Secretary Slater:

I am writing **in support** of Delta Air Lines' application **for four slot exemptions to serve Salt Lake City from Ronald Reagan Washington National Airport @CA**. Boise was listed **this week** by **Forbes Magazine** as **one of the top five cities** in the country for doing business. **We recognize that the health of our airport and convenient and expanded access to major airports** is critical to our continued economic wellbeing. As the **incoming president** of the U.S. Conference of Mayors, I know that **this issue is important** to cities around the country.

**Delta** Air Lines has proposed two daily nonstop round-trip flights between **DCA and Salt Lake City, Utah** using **four** of the twelve slot exemptions **for service beyond the DCA** perimeter created **under the "Wendell H. Ford Aviation Investment and Reform Act for the 21<sup>st</sup> Century."** Salt Lake City is the **only** airline hub located in the **Intermountain** West and is Delta's primary western hub. **Delta's** proposal **will** provide convenient **single** connection online jet service to **65** cities located **in the** western United States.

As you know, this legislation **directs the Department to grant twelve slot exemptions "to air carriers to operate limited frequencies and aircraft on select routes between DCA and domestic hub airports" located beyond the DCA perimeter (i.e., more than 1,250 statute miles from RCA).** Delta's application for **four slot exemptions to operate two daily nonstop round-trip flights between Salt Lake City and DCA** is fully consistent with each of **the** exemption criterion approved by **Congress**.

**Dozens** of small and medium-sized communities which **enjoy nonstop service to Salt Lake City** currently **lack** convenient **and** competitive access to **DCA** due to the **perimeter rule**. **Delta's** application offers the **Department** the opportunity to correct this **service deficiency**. **Delta's** proposal **will** maximize the use of **these limited statutory exemptions by allowing** nonstop **service to Delta's Salt Lake City hub, one of the** major network hubs located in **the western** United States, thus **benefitting numerous small and mid-sized** communities throughout the **Intermountain West and across the northern tier** of states.

I urge you **grant Delta's** application to take advantage of this new opportunity and thereby **ensure that communities throughout the western United States receive improved access to DCA**. Thankyou for your consideration.

Very truly yours,

H. Brent Coles  
Mayor

cc: **Danny Quillen, Delta AirLines Fax 404.715.4779**



**CITY OF CODY**  
**WYOMING**

May 15, 2000

The Honorable Rodney E. Slater  
Secretary, U.S. Department of Transportation  
400 Seventh Street, SW  
Washington, DC 20590

Dear Secretary Slater:

I am writing in support of Delta Air Lines' application for four slot exemptions to serve Salt Lake City from Ronald Reagan Washington National Airport (DCA).

Delta Air Lines has proposed two daily nonstop round-trip flights between DCA and Salt Lake City, Utah using four of the twelve slot exemptions for service beyond the DCA perimeter created under the "Wendell H. Ford Aviation Investment and Reform Act for the 21st Century."

As you know, this legislation directs the Department to grant twelve slot exemptions "to air carriers to operate limited frequencies and aircraft on select routes between DCA and domestic hub airports" located beyond the DCA perimeter (i.e., more than 1250 statute miles from DCA). Delta's application for four slot exemptions to operate nonstop round-trip flights between Salt Lake City and DCA is consistent with each of the exemption criterion approved by Congress.

Salt Lake City and the dozens of small and medium-sized communities that enjoy nonstop service to Salt Lake City have long been deprived of convenient and competitive access to DCA due to the artificial restriction imposed by the perimeter rule. Delta's application offers the Department an opportunity to correct this service deficiency. Delta's proposal will maximize the use of these limited statutory exemptions by allowing nonstop service to Delta's Salt Lake City hub, one of the major network hubs located in the western United States. This will benefit numerous small and mid-sized communities throughout the Intermountain West and across the northern tier of states.

As a major hub, Salt Lake City is ideally situated to serve as a gateway to DCA for many western U.S. communities. Salt Lake City is the only airline hub located in the Intermountain West and is Delta's primary western hub. Delta's proposed service will increase competition in multiple markets located throughout the western United States, provide highly sought-after nonstop service for business and leisure passengers, as well as provide convenient single connection airline jet service to 65 cities located in the western United States.

I urge you to grant Delta's application and thereby ensure communities throughout the western United States receive improved access to DCA. Delta's proposal will result in the optimal use of this valuable new opportunity.

Sincerely,

Jack T. Skates  
Mayor

JACK T. SKATES  
MAYOR

KAREN R. BALLINGER  
JOHN HUNTER  
GARY W. JENSEN  
DAVID T. JOHNSON  
NICK R. PAUL  
ROBERT A. YAGER  
COUNCIL MEMBERS

LARIE M. KADRICH  
CITY ADMINISTRATOR

JAY W. BROWN  
CITY CLERK-TREASURER

ROBERT D. OLSON  
CITY ATTORNEY

C. EDWARD WEBSTER II  
POLICE JUDGE

1338 RUMSEY AVENUE  
P.O. BOX 2200  
CODY, WYOMING 82414

(307) 527-7811  
FAX (307) 527-6832



P.O. Box 5021, 59403-5021

May 8, 2000

The Honorable Rodney Slater  
Secretary – US, Department of Transportation  
400 Seventh Street, S.W.  
Washington, D.C. 20590

Dear Secretary Slater:

I am writing in support of Delta Air Lines' application for four slot exemptions to serve Salt Lake City from Ronald Reagan Washington National Airport (DCA).

Delta Air Lines has proposed two daily nonstop round-trip flights between DCA and Salt Lake City, Utah using four of the twelve slot exemptions for service beyond the DCA perimeter created under the "Wendell H. Ford Aviation Investment and Reform Act for the 21<sup>st</sup> Century".

As you know, this legislation directs the Department to grant twelve slot exemptions "to air carriers to operate limited frequencies and aircraft on select routes between DCA and domestic hub airports" located beyond the DCA perimeter (i.e., more than 1,250 statute miles from DCA). Delta's application for four slot exemptions to operate two daily nonstop round-trip flights between Salt Lake City and DCA is fully consistent with each of the exemption criterion approved by Congress.

Salt Lake City and the dozens of small and medium-sized communities that enjoy nonstop service to Salt Lake City have long been deprived of convenient and competitive access to DCA due to the artificial restriction imposed by the perimeter rule. Delta's application offers the Department the opportunity to immediately correct this service deficiency. Delta's proposal will maximize the use of these limited statutory exemptions by allowing nonstop service to Delta's Salt Lake City hub, one of the major network hubs located in the western United States. This will benefit numerous small and mid-sized communities throughout the intermountain west and across the Northern tier of states.

As a major hub, Salt Lake City is ideally situated to serve as a gateway to DCA for many western U.S. communities. Salt Lake City is the only airline hub located in the intermountain west and is Delta's primary western hub. Delta's proposed two daily flights between DCA and Salt Lake City will enhance online travel options to and from DCA for Great Falls and many small and medium sized communities throughout the western United States. Moreover, Delta's proposed service will increase competition in

**multiple markets** located throughout **the west**, providing **highly sought after nonstop service** for **business** and **leisure passengers** traveling between Salt **Lake** City and **DCA**, as well as provide convenient single **connection online** jet serve to **65** cities located in the **western United States**.

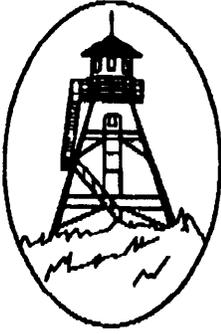
I **urge** you to **grand** Delta's application and thereby **ensure** that communities **throughout the west** receive **improved access** to **DCA**. Delta's proposal **will** result in **the optimal use** of **this valuable** new **opportunity**.

Thank you for your consideration,

Sincerely,



Randall H. Gray  
Mayor



# OFFICE OF THE MAYOR City of Helena

Colleen McCarthy  
316 N. Park Avenue  
Helena MT 59623

Phone: (406) 447-8410 Fax: (406) 447-8460  
E-Mail: cmccarthy@ci.helena.mt.us

May 16, 2000

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

Dear Secretary Slater:

I am writing in support of Delta Air Lines' application for four slot exemptions to serve Salt Lake City from Ronald Reagan Washington National Airport (DCA).

Delta Air Lines has proposed two daily nonstop round-trip flights between DCA and Salt Lake City, Utah using four of the twelve slot exemptions for service beyond the DCA perimeter created under the "Wendell H. Ford Aviation Investment Reform Act for the 21st Century."

As you know, this legislation directs the Department to grant twelve slot exemptions "to air carriers to operate limited frequencies and aircraft on select routes between DCA and domestic hub airports located beyond the DCA perimeter (i.e., more than 1,250 statute miles from DCA). Delta's application for four slot exemptions to operate two daily nonstop round-trip flights between Salt Lake City and DCA is fully consistent with each of the exemption criterion approved by Congress.

Salt Lake City and the dozens of small and medium-sized communities that enjoy nonstop service to Salt Lake City have long been deprived of convenient and competitive access to DCA due to the artificial restriction imposed by the perimeter rule. Delta's application offers the Department the opportunity to immediately correct this service deficiency. Delta's proposal will maximize the use of these limited statutory exemptions by allowing nonstop service to Delta's Salt Lake City hub, one of the major network hubs located in the western United States, which will benefit numerous small and mid-sized communities throughout the intermountain west and across the Northern tier of states.

As a major hub, Salt Lake City is ideally situated to serve as a gateway to DCA for many western U.S. communities. Salt Lake City is the only airline hub located in the intermountain west and is Delta's primary western hub. Delta's proposed two daily flights between DCA and Salt Lake City will enhance online travel options to and from DCA for dozens of small and medium-sized communities throughout the western United States. Moreover, Delta's proposed service will increase competition in multiple markets located throughout the western United States, provide highly south-after nonstop service for business and leisure passengers traveling between Salt Lake City and DCA, as well as provide convenient single connection online jet service to 65 cities located in the western United States.

I urge you to grant Delta's application and thereby ensure that communities throughout the western United States receive improved access to DCA. Delta's proposal will result in the optimal use of this valuable new opportunity.

As the Mayor of Helena, the Capital city of Montana, I know that many of our citizens would benefit if Delta Air Lines receives the four slot exemptions that they have applied for. Thank you for your consideration.

Sincerely,

Colleen McCarthy  
Mayor

c: Ron Mercer, Helena Regional Airport



**Linda Milam**  
Mayor

## CITY OF IDAHO FALLS

Office of the Mayor  
City Hall  
Idaho Falls, Idaho 83405

May 18, 2000

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

Dear **Secretary Slater**,

I am writing in support of Delta **Air Lines'** application for four slot exemptions to **serve** Salt Lake City **from** Ronald **Rcagan** Washington National **Airport (DCA)**.

Delta Air Lines has **proposed two** daily nonstop round-trip flights between **DCA** and Salt Lake City, **Utah** using four of the twelve slot exemptions for service beyond the **DCA perimeter** created under the "Wendell **H. Ford Aviation Investment and Reform Act for the 21<sup>st</sup> Century.**"

As you know, this legislation directs the Department to grant twelve slot exemptions "... to air carriers to operate **limited frequencies** and **aircraft** on select routes between **DCA** and domestic hub **airports...**" located **beyond the DCA perimeter (i.e., more than 1,250 statute miles from DCA)**. Delta's application for four slot exemptions to operate **two daily nonstop round-trip** flights between Salt Lake City and **DCA** is fully consistent with each of the exemption criterion approved by Congress.

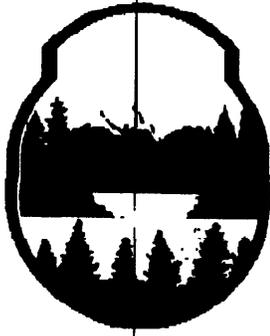
Salt Lake City and the dozens of small and medium-sized **communities** that enjoy nonstop service to Salt Lake City have long **been** deprived of convenient and **competitive** access to **DCA** due to the artificial restriction imposed by the perimeter rule. Delta's application offers the Department the opportunity to immediately correct this service deficiency. Delta's proposal will maximize the use of these limited statutory exemptions by allowing nonstop service to Delta's Salt Lake City hub, **one** of the major **network** hubs located in the western United States, which will benefit numerous small and mid-sized communities throughout the **intermountain** west and across the Northern tier of states.

As a major hub, **Salt** Lake City is ideally situated to serve as a gateway to **DCA** for many **western** U.S. communities. Delta's proposed two daily flights between **DCA** and Salt Lake City will enhance online travel options to and **from DCA** for dozens of small and **medium-sized** communities like Idaho Falls **throughout** the western **United** States. Moreover, Delta's proposed service will provide sought-after nonstop service for business and leisure passengers traveling between Salt Lake City and **DCA**, as well as provide convenient single connection online jet service to **65** cities located in the western United States.

I urge you to grant Delta's application and thereby ensure that communities throughout the western United **States** receive improved access to **DCA**. Delta's proposal will result in the optimal **use** of **this** valuable new opportunity.

Thank you for your consideration.

Sincerely,  
  
Linda Milam  
Mayor  
City of Idaho Falls



## City of Kalispell

Post Office Box 1997 . Kalispell, Montana 59903-1997 • Telephone (406) 758-7700 • FAX (406) 758-7758

May 18, 2000

The Honorable Rodney E. Slater  
Secretary - U.S. Department of Transportation  
400 Seventh Street, SW  
Washington, DC 20590

Dear Secretary Slater:

I am writing in support of Delta Air Lines' application for four slot exemptions to serve Salt Lake City from Ronald Reagan Washington National Airport (DCA).

Delta Air Lines has proposed two daily nonstop round-trip flights between DCA and Salt Lake City, Utah using four of the twelve slot exemptions for service beyond the DCA perimeter created under the "Wendell H. Ford Aviation Investment and Reform Act for the 21st Century."

As you know, this legislation directs the Department to grant twelve slot exemptions "to air carriers to operate limited frequencies and aircraft on select routes between DCA and domestic hub airports" located beyond the DCA perimeter (i.e., more than 1,250 statute miles from DCA). Delta's application for four slot exemptions to operate two daily nonstop round-trip flights between Salt Lake City and DCA is fully consistent with each of the exemption criterion approved by Congress.

Salt Lake City and the dozens of small and medium-sized communities that enjoy nonstop service to Salt Lake City have long been deprived of convenient and competitive access DCA due to the artificial restriction imposed by the perimeter rule. Delta's application offers the Department the opportunity to immediately correct this service deficiency. Delta's proposal will maximize the use of these limited statutory exemptions by allowing nonstop service to Delta's Salt Lake City hub, one of the major network hubs located in the western United States, which will benefit numerous small and mid-sized communities, including Kalispell, throughout the intermountain west and across the Northern tier of states.

As a major hub, Salt Lake City is ideally situated to serve as a gateway to DCA for many western U.S. communities. Salt Lake City is the only airline hub located in the intermountain west and is delta's primary western hub. Delta's proposed two daily flights between DCA and Salt Lake City will enhance online travel options to and from DCA for dozens of small and medium-sized communities throughout the western United States. Moreover, Delta's proposed service will increase competition in multiple markets located throughout the western United States, provide highly sought-

May 18, 2000  
The Honorable Mayor  
Delta Airlines  
Page Two

**after nonstop** service for **business and leisure passengers traveling** between Salt **Lake** City and **DCA**, **as well as provide** convenient **single connection** online **jet service** to **65** cities **located** in the **western** **UNited** States.

**I urge you to grant Delta's application and thereby ensure that communities throughout the western United States, including Kalispell, receive improved access to DCA. Delta's proposal will result in the optimal use of this valuable new opportunity.**

**Thank you for your consideration.**

Sincerely,

**Wm. E. Boharski**

**Wm. E. Boharski**  
**Mayor**  
**City of Kalispell**

**WEB/ksk**



MIKE KADAS

OFFICE OF THE MAYOR

435 RYMAN MISSOULA, MONTANA 59802-4297

May 10, 2000

COPY

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

Dear Secretary Slater:

I am writing in support of Delta Air Lines' application for four slot exemptions to **serve Salt Lake City from Ronald Reagan Washington National Airport (DCA).**

Delta Air Lines has proposed two daily nonstop round-trip flights between **DCA and Salt Lake City, Utah** using **four of the twelve slot exemptions for service beyond the DCA perimeter created under the "Wendell H. Ford Aviation Investment and Reform Act for the 21<sup>st</sup> Century."**

As you know, this legislation directs the Department to grant twelve slot exemptions **"to air carriers to operate limited frequencies and aircraft on select routes between DCA and domestic hub airports" located beyond the RCA perimeter (i.e., more than 1,250 statute miles from DCA).** Delta's application for **four slot exemptions to operate two daily nonstop round-trip flights between Salt Lake City and DCA is fully consistent with each of the exemption criterion approved by Congress.**

**Salt Lake City is one of two hubs with direct flights to Missoula. Salt Lake City is the only airline hub located in the intermountain west and is Delta's primary western hub. Delta's proposed two daily flights between DCA and Salt Lake City will enhance online travel options to and from DCA for Missoula and dozens of small and medium-sized communities throughout the western United States. Moreover, Delta's proposed service will increase competition in multiple markets located throughout the western United States, provide highly sought-after nonstop service for business and leisure passengers traveling between Salt Lake City and DCA, as well as provide convenient single connection online jet service to 65 cities located in the western United States.**

I urge you grant Delta's application and thereby **ensure that communities throughout the western United States receive improved access to DCA. Delta's proposal will result in the optimal use of this valuable new opportunity.**

Thank you for your consideration.

Sincerely,

Mike Kadas  
 Mayor

*Copy sent to D. Culler - Delta on May 10, 2000*

MAY-19 00 13:04. IT:27  
05/18/00

435 649 4132

PARK CITY C/B TO: 202 216 0824

PAGE: 07  
002

Dear Secretary Slater,

I am writing in support of Delta Air Lines' application for four slot exemptions to serve Salt Lake City from Ronald Reagan Washington National Airport (DCA).

Delta Air Lines has proposed two daily nonstop round-trip flights between Ronald Reagan Washington National Airport and Salt Lake City, Utah using four of the twelve slot exemptions for service beyond the DCA perimeter created under the "Wendell H. Ford Aviation Investment and Reform Act for the 21<sup>st</sup> Century".

As you know, this legislation directs the Department to grant twelve slot exemptions "to air carriers to operate limited frequencies and aircraft on select routes between Ronald Reagan Washington National Airport and domestic hub airports" located beyond the DCA perimeter (i.e., more than 1,250 statute miles from DCA). Delta's application for four slot exemptions to operate two daily nonstop round-trip flights between Salt Lake City and DCA is fully consistent with each of the exemption criterion approved by Congress.

Salt Lake City and the dozens of small and medium-sized communities that enjoy nonstop service to Salt Lake City have long been deprived of convenient and competitive access to Ronald Reagan Washington National Airport due to the artificial restriction imposed by the perimeter rule. Delta's application offers the Department the opportunity to immediately correct this service deficiency. Delta's proposal will maximize the use of these limited statutory exemptions by allowing nonstop service to Delta's Salt Lake City hub, one of the major network hubs located in the western United States, which will benefit numerous small and mid-sized communities throughout the Intermountain West and across the Northern tier of states.

As a major hub, Salt Lake City is ideally situated to serve as a gateway to DCA for many western U.S. communities. Salt Lake City is the only airline hub located in the Intermountain West and is Delta's primary western hub. Delta's proposed two daily flights between DCA and Salt Lake City will enhance online travel options to and from DCA for dozens of small and medium-sized communities throughout the western United States. Moreover, Delta's proposed service will increase competition in multiple markets located throughout the western United States, provide highly sought-after nonstop service for business and leisure passengers traveling between Salt Lake City and DCA, as well as provide convenient single connection online jet service to 65 cities located in the western United States.

I urge you to grant Delta's application and thereby ensure that communities throughout the western United States receive improved access to DCA. Delta's proposal will result in the optimal use of this valuable new opportunity.

Thank you for your consideration.

Sincerely,

Bill Malone  
Executive Director  
Park City Chamber/Visitors Bureau

**CHAMBER OF COMMERCE  
CONVENTION & VISITORS BUREAU**

P.O. Box 1630, Park City, Utah 84060-1630 - 1910 PROSPECTOR AVENUE  
NEEDLEPOINT 435-243-8100 FAX 435-649-4132  
www.parkcityinfo.com



OFFICE OF THE MAYOR  
 911 North 7th Avenue  
 P.O. Box 4169  
 Pocatello, Idaho 83205  
 (208) 234-6163  
 Fax: (208) 234-6297

GREGORY R. ANDERSON  
 Mayor

Pocatello City Council:  
 BOB FOSTER  
 RON FRASURE  
 BILL LYNN  
 PENNY NICHOLS PINK  
 BRIAN T. UNDERWOOD  
 DALE W. WILKINSON

May 18, 2000

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

Dear Secretary Slater:

The City of Pocatello supports Delta Air Lines' application for four slot exemptions to serve Salt Lake City from Ronald Reagan Washington National Airport (DCA).

Delta Air Lines has proposed two daily nonstop, round-trip flights between DCA and Salt Lake City, Utah using four of the twelve slot exemptions for service beyond the DCA perimeter created under the "Wendell H. Ford Aviation Investment and Reform Act for the 21st Century". Delta's application for four slot exemptions to operate these two flights between DCA and Salt Lake City is fully consistent with each of the exemption criterion approved by Congress.

Salt Lake City and the dozens of small and medium-sized communities that enjoy nonstop service to Salt Lake City have long been deprived of convenient and competitive access to DCA due to the restriction imposed by the perimeter rule. Delta's application offers the opportunity to maximize the use of these limited statutory exemptions by allowing nonstop service to Delta's Salt Lake City hub, one of the major network hubs located in the western United States, and will benefit numerous small and mid-sized communities throughout the intermountain west and across the Northern tier of states.

As a major hub and Delta's primary western hub, Salt Lake City is ideally situated to serve as a gateway to DCA for many western U. S. communities. Delta's proposed two daily flights between DCA and Salt Lake City will enhance online travel options to and from RCA for dozens communities. Moreover, Delta's proposed service will increase competition in multiple markets located throughout the western United States, provide highly sought-after nonstop service for business and leisure passengers traveling between Salt Lake City and DCA, as well as provide convenient single connection online jet service to 65 cities located in the western United States.

I urge you to grant Delta's application, and thereby ensure that communities throughout the western United States receive improved access to DCA. Delta's proposal will result in the optimal use of this valuable new opportunity.

Sincerely,

Gregory R. Anderson  
 Mayor

cc: Len Nelson, Pocatello Regional Airport Manager  
 Danny K. Quillen, Delta Air Lines

MAY-19 00 13:03 FROM:

TO:202 216 0824

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Richard E. Davis  
 Director  
 801-534-4926  
 801-534-4927  
 Fax: 801-534-4928

May 19, 2000

**SENT BY FEDERAL EXPRESS**

Secretary Slater  
 Federal Aviation Administration  
 800 Independence Ave., SW  
 Washington, DC 20591

Dear Secretary Slater:

I am writing in support of Delta Air Lines' application for four slot exemptions to serve Salt Lake City from Ronald Reagan Washington National Airport (DCA).

Delta Air Lines has proposed two daily nonstop round-trip flights between Ronald Reagan Washington National Airport and Salt Lake City, Utah using four of the twelve slot exemptions for service beyond the DCA perimeter created under the "Wendell H. Ford Aviation Investment and Reform Act for the 21st Century."

As you know, this legislation directs the Department to grant twelve slot exemptions "to air carriers to operate limited frequencies and aircraft on select routes between Ronald Reagan Washington National Airport and domestic hub airports" located beyond the DCA perimeter (i.e., more than 1,250 statute miles from DCA). Delta's application for four slot exemptions to operate two daily nonstop round-trip flights between Salt Lake City and DCA is fully consistent with each of the exemption criterion approved by Congress.

Salt Lake City and the dozens of small and medium-sized communities that enjoy nonstop service to Salt Lake City need convenient and competitive access to Ronald Reagan Washington National Airport. Delta's proposal will maximize the use of these limited statutory exemptions by allowing nonstop service to Delta's Salt Lake City hub, one of the major network hubs located in the western United



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Secretary Slater  
May 19, 2000  
Page 2.

States, which will benefit numerous small and mid-sized communities throughout the intermountain west and across the northern tier of states.

As a major hub, Salt Lake City is ideally situated to serve as a gateway to DCA for many western U.S. communities. Salt Lake City is the only airline hub located in the intermountain west and is Delta's primary western hub. Delta's proposed two daily flights between DCA and Salt Lake City will enhance online travel options to and from DCA for dozens of small and medium-sized communities throughout the western United States. Moreover, Delta's proposed service will increase competition in multiple markets located throughout the western United States, provide highly sought-after nonstop service for business and leisure passengers traveling between Salt Lake City and DCA, as well as provide convenient single connection online jet service to 65 cities located in the western United States.

I urge you grant Delta's application and thereby ensure that communities throughout the western United States receive improved access to DCA. Delta's proposal will result in the optimal use of this valuable new opportunity.

Thank you for your consideration.

Sincerely,



Richard E. Davis  
President/CEO

RED/m b

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TO: 202 216 0824

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FAX:

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### Salt Lake Area Chamber of Commerce

Chamber of Commerce Building • 175 East 400 South, Suite 600 • Salt Lake City, Utah 84111  
(801) 369-3631 • Fax (801) 320-5098 • www.saltlakechamber.org

May 18, 2000

Mr. Rodney E. Slater  
Transportation Secretary  
Federal Aviation Administration  
800 Independence Avenue SW  
Washington, DC 20591

Dear Secretary Slater:

I am writing in support of Delta Air Lines' application for four slot exemptions to serve Salt Lake City from Ronald Reagan Washington National Airport (DCA).

Delta Air Lines has proposed two daily nonstop round-trip flights between Ronald Reagan Washington National Airport and Salt Lake City, Utah using four of the twelve slot exemptions for service beyond the DCA perimeter created under the "Wendell H. Ford Aviation Investment and Reform Act for the 21<sup>st</sup> Century."

As you know, this legislation directs the Department to grant twelve slot exemptions "to air carriers to operate limited frequencies and aircraft on select routes between Ronald Reagan Washington National Airport and domestic hub airports" located beyond the DCA perimeter (i.e., more than 1,250 statute miles from DCA). Delta's application for four slot exemptions to operate two daily nonstop round-trip flights between Salt Lake City and DCA is fully consistent with each of the exemption criterion approved by Congress.

Salt Lake City and the dozens of small and medium-sized communities that enjoy nonstop service to Salt Lake City, have long been deprived of convenient and competitive access to Ronald Reagan Washington National Airport due to the artificial restriction imposed by the perimeter rule. Delta's application offers the Department the opportunity to immediately correct this service deficiency. Delta's proposal will maximize the use of these limited statutory exemptions by allowing nonstop service to Deb's Salt Lake City hub, one of the major network hubs located in the western United States. Which will benefit numerous small and mid-sized communities throughout the intermountain west and across the Northern tier of states.

As a major hub, Salt Lake City is ideally situated to serve as a gateway to DCA for many western U. S. communities. Salt Lake City is the only airline hub located in the intermountain west and is Delta's primary western hub. Delta's proposed two daily flights between DCA and



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**Salt Lake City will enhance online travel options to and from DCA for dozens of small and medium-sized communities throughout the western United States. Moreover, Delta's proposed service will increase competition in multiple markets located throughout the western United States, provide highly sought-after nonstop service for business and leisure passengers traveling between Salt Lake City and DCA, as well as provide convenient single connection online jet service to 65 cities located in the western United States.**

**I urge you grant Delta's application and thereby ensure that communities throughout the western United States receive improved access to DCA. Delta's proposal will result in the optimal use of this valuable new opportunity.**

**Thank you for your consideration.**

Sincerely,



■  
Larry G. Mankin  
President & CEO

# Y·E·L·L·O·W·S·T·O·N·E

## REGIONAL AIRPORT

May 16, 2000

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

**RE: DELTA AIRLINES APPLICATION FOR FOUR SLOT EXEMPTIONS AT RONALD REAGAN WASHINGTON NATIONAL AIRPORT**

Dear Mr. Slater:

I am writing in support of Delta Air Lines' application for four slot exemptions to serve Salt Lake City International Airport (SLC) from Ronald Reagan Washington National Airport (DCA). Delta Air Lines has proposed two daily nonstop roundtrip flights between DCA and Salt Lake City, Utah, using four of the twelve slot exemptions for service beyond the DCA perimeter created under the "Wendell H. Ford Aviation Investment and Reform Act for the 21<sup>st</sup> Century."

As you know, this legislation directs the Department to grant twelve slot exemptions "to air carriers to operate limited frequencies and aircraft on select route between DCA and domestic hub airports" located beyond the DC perimeter (i.e., more than 1,250 statute miles from DCA). Delta's application for four slot exemptions to operate two daily nonstop flights between Salt Lake City and DCA is fully consistent with each of the exemption criteria approved by Congress.

Dozens of western communities such as Cody that enjoy nonstop service to Salt Lake City have long been deprived of convenient and competitive access to DCA due to the artificial restriction imposed by the perimeter rule. Delta's proposal will maximize the use of these limited statutory exemptions by allowing nonstop service between DCA and Delta's Salt Lake City hub, which handles over 50% of the passenger traffic arriving at or departing from the Yellowstone Regional Airport. This exemption would offer users of our airport one stop connections to the Washington, D.C. area, which in 1999 was our airport's 13<sup>th</sup> busiest travel market.

I urge you to grant Delta's application, ensuring that small western communities such as ours receive improved access to DCA. Delta's proposal will certainly result in optimal use of this valuable new opportunity.

Sincerely,



David R. Ulane, A.A.E.  
Airport Manager

**CERTIFICATE OF SERVICE**

I hereby certify that I have this 22nd day of May, 2000, served the foregoing Consolidated Answer of Delta Air Lines, Inc., upon those persons listed below by first class mail, postage prepaid and addressed as follows.

Marshall S. Sinick  
Squire Sanders & Dempsey, LLP  
1201 Pennsylvania Ave., NW, Ste. 400  
Washington, DC 20004

Hon. Dianne Feinstein  
United States Senate  
331 Hart Senate Office Building  
Washington, DC 20510

Hon. Anthony Williams, Mayor  
District of Columbia  
444 4<sup>th</sup> Street, NW, Ste. 1100  
Washington, DC 20001

Hon. Barbara Boxer  
United States Senate  
112 Hart Senate Office Building  
Washington, DC 20510

Hon. James Gilmore, Governor  
Commonwealth of Virginia  
State Capitol  
Richmond, VA 23219

Hon. Gray Davis, Governor  
State of California  
State Capitol Building  
Sacramento, CA 95814

Hon. Richard J. Durbin  
United States Senate  
364 Russell Senate Office Building  
Washington, DC 20510

Hon. Willie L. Brown, Jr., Mayor  
City of San Francisco  
1 Dr. Carlton B. Goodlett Place  
San Francisco, CA 94102

Hon. Peter G. Fitzgerald  
United States Senate  
555 Dirksen Senate Office Building  
Washington, DC 20510

Hon. Richard Riordan, Mayor  
City of Los Angeles  
200 N. Main Street, Ste. 800  
Los Angeles, CA 90012

Hon. George H. Ryan, Governor  
State of Illinois  
207 Statehouse  
Springfield, IL 62706

Hon. Richard M. Daley, Mayor  
City of Chicago  
121 N. LaSalle St., Room 507  
Chicago, IL 60602

John Sullivan, Jr.  
Commutair  
Clinton County Airport  
5 18 Rugar Street  
Plattsburgh, NY 12901

Atlantic Coast Airlines, Inc.  
1 Export Drive  
Sterling, VA 20164

Atlantic Southeast Airlines, Inc.  
100 Hartsfield Center Parkway, Ste. 800  
Atlanta, GA 30354

Aaron Goerlich  
Gary Garofalo  
Boros & Garofalo  
1201 Connecticut Ave., NW, Ste. 700  
Washington, DC 20036-2605

Jeffrey A. Manley  
Wilmer Cutler & Pickering  
2445 M St., NW  
Washington, DC 20006

Robert M. Beckman  
Bode & Beckman  
1150 Connecticut Ave., NW  
Washington, DC 20036

R. Bruce Keiner, Jr.  
Crowell & Moring, LLP  
100 1 Pennsylvania Ave., NW  
Washington, DC 20004

Lawrence R. Laturette  
Preston Gates and Rouvelas Meeds  
1735 New York Ave., NW, Ste. 500  
Washington, DC 20006

Air Midwest, Inc.  
d/b/a USAir Express  
Box 7724, Mid-Continent Airport  
Wichita, KS 67277

Air-Tran Airways, Inc.  
6280 Hazeltine National Drive, Ste. 100  
Orlando, FL 23822

Allegheny Airlines, Inc.  
Box 601  
Harrisburg International Airport  
Middletown, PA 17057

John Gillick  
Winthrop Stimson Putnam  
1133 Connecticut Ave., NW, Ste. 1200  
Washington, DC 20036

Carl Nelson  
American Airlines, Inc.  
1101 17<sup>th</sup> St., NW, Ste. 600  
Washington, DC 20036

Richard Taylor  
Steptoe & Johnson  
1330 Connecticut Ave., NW  
Washington, DC 20036-1795

Charles Colgan  
Colgan Air, Inc.  
10677 Aviation Road  
Manassas, VA 22111

Miami Air International, Inc.  
PO Box 660880  
Miami, FL 33266

Exec Express II  
d/b/a Lone Star Airlines  
d/b/a Aspen Mountain Air  
13 1 East Exchange Avenue, Ste. 222  
Fort Worth, TX 76106

Jonathan B. Hill  
Dow Lohnes & Albertson  
1200 New Hampshire Ave., NW  
Washington, DC 20036

Mark S. Kahan, Vice Chairman  
Spirit Airlines, Inc.  
1400 Lee Wagener Blvd.  
Ft. Lauderdale, FL 33315

John S. Fredericksen  
Mesaba Aviation, Inc.  
7501 20<sup>th</sup> Ave., South  
Minneapolis, MN 55450

Mr. D. Joseph Coor, President  
AirTran Airlines  
1800 Phoenix Blvd., Ste. 126  
Atlanta, GA 30349

Joanne Young  
David M. Kirstein  
Baker & Hostetler  
1050 Connecticut Ave., NW, Ste. 1100  
Washington, DC 20036

Glenn Wicks  
The Wicks Group  
1700 North Monroe St., Ste. 1650  
Alexandria, VA 22209

Robert P. Silverberg  
Silverberg Goldman & Bikoff LLP  
1101 30<sup>th</sup> St., NW  
Washington, DC 20007

Ronald P. Brower  
Hogan & Hartson LLP  
555 Thirteenth St., NW  
Washington, DC 20004-1109

Andre Merrett, Vice President and  
General Counsel  
Mesa Air Group  
410 North 44<sup>th</sup> St., Ste. 700  
Phoenix, AZ 85008

Stephen H. Lachter  
1150 Connecticut Ave., NW, Ste. 900  
Washington, DC 20036

Nations Air Express, Inc.  
d/b/a World Pacific Airways  
2400 Herodian Way, Ste. 440  
Smyrna, GA 30080

Megan Rae Rosia  
Managing Director, Government Affairs  
And Associate General Counsel  
Northwest Airlines, Inc.  
901 15<sup>th</sup> St., NW, Ste. 310  
Washington, DC 20005

Joel Stephen Burton  
O'Melveny & Myers  
555 13<sup>th</sup> St., NW  
Washington, DC 20004-1109

William Evans  
Verner, Lipfert, Bernhard,  
McPherson and Hand, Chartered  
901 15<sup>th</sup> St., NW  
Washington, DC 20005-2301

Simmons Airlines, Inc.  
d/b/a American Eagle  
1700 W. 20<sup>th</sup> Street  
Box 612527  
DFW Airport, TX 75261

Brad Rich  
SkyWest Airlines, Inc.  
d/b/a The Delta Connection  
444 S. River Road  
St. George, UT 84770

Sunworld International Airlines, Inc.  
207 Grandview Drive  
Fort Mitchell, KY 41014

Richard D. Mathias  
Zuckert Scoutt & Rasenberger  
888 17<sup>th</sup> St., NW, Ste. 600  
Washington, DC 20006

Jeffrey Shane  
Wilmer Cutler & Pickering  
2445 M St., NW  
Washington, DC 20006

Edward P. Faberman  
Ungaretti & Harris  
1500 K St., NW, Ste. 250  
Washington, DC 20005

Sierra Pacific Airlines, Inc.  
7700 North Business Park Drive  
Tucson, AZ 85743

Bradley D. Toney, Director of  
Legal Affairs  
Pro Air, Inc.  
101 Elliott Avenue West, Ste. 500  
Seattle, WA 98119

Pierre Murphy  
One Westin Center  
2445 M Street, NW, Ste. 260  
Washington, DC 20037

TEM Enterprises, Inc.  
d/b/a Casino Express Airlines  
9766 Mountain City Highway  
Elko, NV 89801

Ms. Lorelei Peters  
Office of the Chief Counsel, AGC-230  
Federal Aviation Administration  
800 Independence Ave., SW  
Washington, DC 2059 1

Stephen L. Gelband  
Hewes Gelband Lambert & Dann  
1000 Potomac St., NW, Ste. 300  
Washington, DC 20007

Lydia Kennard, Executive Director  
Los Angeles World Airports  
One World Way  
PO Box 92216  
Los Angeles, CA 90009

Christopher Brown, Airport Manager  
Reagan Washington National Airport  
Washington, DC 2000 1

James A. Wilding, President & CEO  
Metropolitan Washington  
Airports Authority  
One Aviation Circle, Ste. 300  
Washington, DC 20001

Commissioner Ellen O'Donnell  
Chicago Midway Airport  
5700 South Cicero  
Chicago, IL 60638

Commissioner Thomas Walker  
Chicago Aviation Department  
Chicago O'Hare International Airport  
PO Box 66142  
Chicago, IL 60666

Henry E. Berman, President  
San Francisco Airport Commission  
San Francisco International Airport  
PO Box 8097  
San Francisco, CA 94128-8097



Pauline C. Donovan