

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

| | | |
|---|---|-----------------------------|
| In the matter of |) | |
| |) | |
| THE WENDELL H. FORD AVIATION INVESTMENT AND REFORM ACT FOR THE 21ST CENTURY |) | Docket OST-2000-7181 |
| |) | |
| For exemptions from 14 C.F.R. Part 93, under 49 U.S.C. § 41718(a) (beyond-perimeter slot exemptions for Reagan National Airport) |) | |
| |) | |

Dated: May 22, 2000

COMMENTS OF NORTHWEST AIRLINES, INC.

Northwest Airlines, Inc. (“Northwest”), pursuant to 49 U.S.C. § 41718(d)(2) and the Department’s Notice served April 14, 2000, hereby submits the following Comments to the applications submitted in this docket seeking slot exemptions to operate service between Ronald Reagan Washington National Airport (“DCA” or “National”) and gateway destinations more than 1,250 miles away from DCA. Nine carriers have submitted applications proposing a total of 22 nonstop roundtrips between DCA and seven different gateway destinations located in the western United States. Northwest’s proposed once daily nonstop service between DCA and Northwest’s hub at Seattle will produce a superior combination of enhanced competition and network service benefits for more communities, including more small and medium sized communities, than any other applicant/gateway proposal in this proceeding. Two of the twelve slot exemptions available at DCA for beyond perimeter service should be allocated to Northwest/Seattle.

I. Introduction

The Wendell H. Ford Aviation Investment and Reform Act for the 21st Century (“Air 21”), codified in 49 U.S.C. § 41718, authorizes the Department to grant twelve slot exemptions “on select routes between Ronald Reagan Washington National Airport and domestic hub airports” located beyond the DCA perimeter. Congress provided the Department with explicit criteria to apply in allocating these limited opportunities for beyond perimeter service. Specifically, the Secretary is directed to allocate the slot exemptions to: “provide domestic network benefits in areas beyond the perimeter” and “increase competition by new entrant air carriers or in multiple markets.”

Northwest’s proposed **DCA-Seattle** daily nonstop service is uniquely designed to fulfill the Congressional objectives expressed in Air 21:

- Northwest’s **DCA-SEA** nonstop service will introduce competition in the Seattle-Washington, **D.C.** market (including **IAD** and **BWI**), the fourth largest local market proposed in this proceeding, presently served exclusively by United Air Lines (**NWA100** and **101**);
- Other than resort destinations, Seattle currently has the second lowest level of nonstop service to Washington, **D.C.** of the proposed gateways (**NWA100**);
- With only **8%** of the total O&D **enplanements** at Seattle, Northwest has the smallest market share at its proposed gateway of

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all the applicants proposing any meaningful “network benefits”

(NWA106);

- Via its Seattle network, Northwest will offer new **onestop** service and improved competition for the third largest total **traffic** base (nonstop and **onestop**) of the 11 carrier/gateway combinations proposed in this proceeding(NWA102);
- By virtue of Northwest’s network at Seattle, **48** beyond-perimeter communities will receive new **onestop** connecting service to **DCA**, more **onestop** communities than under any other applicant/gateway proposal (NWA103);
- Twenty-one of these communities will receive their first **onestop** service to **DCA**, the largest number of first **onestop** markets of all the applicants (Id.);
- An additional 4 communities will receive their first **competitive onestop** service to Washington, DC. (**DCA** and **IAD** combined) under Northwest’s proposal – Northwest is the only applicant that will introduce first competitive **onestop** service (Id.);
- More small and medium sized communities, as classified by the FAA, will receive **onestop** service to the Nation’s capital on Northwest via Seattle than under any other applicant/gateway proposal (NWA104);

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II. Northwest/Seattle is a superior carrier/gateway proposal under the stated statutory criteria.

Northwest has submitted a modest request in this proceeding, seeking only two of the twelve available slot exemptions for beyond perimeter service, that is designed to accomplish the express criteria listed in Air 21. Northwest will use these slots to operate one daily nonstop roundtrip flight between National Airport and Northwest's hub at Seattle. Northwest initially will utilize an **Airbus 319 Stage-3** aircraft configured with 124 seats (**16-First/108-Coach**). Northwest will **upgauge** to a Boeing 757 aircraft if market conditions warrant. While Air 21 does permit the Department to consider Northwest's proposal to operate an **Airbus** in making its selection in this case, the pertinent provision is permissive, not mandatory.¹ Northwest has submitted a proposal that will produce a combination of network service benefits and enhanced competition superior to those offered by any other applicant, with small and medium sized communities being major beneficiaries under Northwest's proposal.

United presently is the only nonstop operator between Seattle and Washington, D.C. (including **DCA, IAD and BWI**) (**NWA100**). Selection of Northwest in this proceeding will introduce first time competition to the Seattle-Washington nonstop

¹ Northwest submits that the Department should not penalize Northwest, Seattle, nor Seattle's behind-gateway communities, based upon the manufacturer of the aircraft Northwest proposes. While Air 21 permits the Department to take such things into consideration, the pertinent provision is permissive, not mandatory. 49 U.S.C. Section 41715(c). Rather than proposing a larger aircraft and then downgrading it, Northwest has proposed up front the aircraft that it believes to be best suited for this market. United, which operates a hub at **Dulles** and is larger than Northwest at Seattle, today operates a combination of **Airbus 319** and **320** aircraft on a majority of its flights between Seattle

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market. Northwest has submitted the only application that, if selected, will introduce the first nonstop competitor between Washington and a proposed gateway. Seattle is the **fifth** largest market lacking nonstop service to **DCA**, and the fourth largest of the gateways proposed here (**NWA102**). Other than the resort destinations of Las Vegas and Phoenix, the Seattle-Washington, D.C. market presently has the second fewest daily nonstop flights of the gateways proposed in this proceeding, second only to Salt Lake City. (**NWA100**).

At Seattle, Northwest operates a substantial network of flights in conjunction with its codeshare partners Alaska Airlines and Horizon. Northwest's proposed **DCA-Seattle** nonstop flight is timed to connect at Seattle with flights to a total of **48** communities located outside the perimeter. (**NWA103**) Twenty-one of these communities will receive first **onestop** service to Washington, D.C. (**IAD** and **DCA**. (*Id.*) An additional 4 cities will receive first competitive **onestop** service. (*Id.*) Forty-two of these communities fall under the category of **nonhub**, small hub or medium hub under the FAA's Primary Airport **Enplanement** Activity Summary (**CY1997**), communities which Air 21 is expressly designed to benefit (**NWA103** and **104**) Indeed, Northwest will offer more small and medium sized communities with **onestop** access to the Nation's Capital than any other applicant/gateway in this proceeding.

Northwest's proposed once nonstop service between **DCA** and Northwest's hub at Seattle will produce a superior combination of enhanced competition and network service

and **IAD**. Northwest's proposal is entirely reasonable and will produce substantial benefits in the form intended by Congress in enacting Air 21.

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benefits for more communities, including more small and medium sized communities, superior to any other applicant/gateway proposal in this proceeding. Two of the available twelve slot exemptions should be allocated to Northwest/Seattle.

A. American/LAX should not be selected over Northwest/Seattle

American Airlines is seeking four of the twelve slot exemptions to enable American to operate two daily roundtrip flights between **DCA** and Los Angeles (“LAX”). LAX currently receives more nonstop service to the Washington’ **D.C.** area than any other gateway proposed in this proceeding’ with fourteen daily flights at **IAD** (4 by American and 10 by United) and four daily flights out of **BWI** (2 by United and 2 by USAir). (NWA100) There are three carriers already serving the LAX-Washington’ **D.C.** nonstop market, more competitors than in any other proposed gateway. Because American already operates four daily flights between **IAD** and LAX, approval of American’s application will not inject a new competitor in the LAX-Washington, **D.C.** market. By contrast, Northwest proposes the first competitive nonstop service between Seattle and Washington’ **D.C.** (including **IAD** and **BWI**). American also is significantly larger at Los Angeles than is Northwest at Seattle, with 15% compared to 8% market shares respectively based upon O&D **enplanements**. (NWA106) American also is larger at **DCA**, with 14% of total O&D **enplanements** compared to Northwest’s 8% share. (NWA105)

American will offer relatively limited network benefits via its LAX hub. American’s **DCA-LAX** nonstop service will provide only 13 communities beyond LAX

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with **onestop** service to the Nation's Capital, compared to the **48 onestop** destinations Northwest will serve via Seattle. (NWA103) Only 3 of American's **onestop** markets will receive their first single connecting service to **DCA**, compared with **21** such communities under Northwest's **DCA-SEA** proposal. (Id.) American will not introduce first competitive **onestop** service to Washington, **D.C.** for a single community, whereas Northwest will introduce **onestop** competition for 4 U.S. communities. (Id.) American will provide **onestop** service for only 9 small and medium sized airports, compared to the **42** small and medium sized communities that Northwest will provide **onestop** access to the Nation's Capital. (NWA104) Northwest's **DCA-SEA** proposal will provide superior network service benefits and enhance competition to a greater extent than will American's proposed nonstop service between **DCA** and Los Angeles.

B. American Trans Air

American **Trans Air** is seeking four daily slot exemptions at **DCA** to operate two daily roundtrips, one **DCA-LAX** and one **DCA-SFO**. Although American **Trans Air** proposes to serve the two largest markets currently lacking nonstop service to **DCA**, these markets are already well served compared to Seattle. There currently are **18** daily nonstop flights between Washington' DC. (**IAD** and **BWI**) and Los Angeles, operated by three competitors (American, United and **USAirways**). (NWA100) Of all the gateways in this proceeding' **LAX** has the most nonstop service and the largest number of nonstop competitors. The story is similar in the San Francisco-Washington, **D.C.** market. There are currently **12** daily nonstop flights and two competitors. United operates 9 daily

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flights out of **IAD**, and United operates one flight and **USAirways 2** at **BWI**. (**NWA100**)

By contrast, there is only one carrier serving the Seattle-Washington, **D.C.** nonstop market with 4 daily flights (all operated by United at **IAD**). Seattle receives less than 25% of the Washington, **D.C.** nonstop service of Los Angeles, and only one-third the level of nonstop service that exists between Washington, **D.C.** and San Francisco. The Seattle-Washington, **D.C.** nonstop market is a current United monopoly.

Because American **Trans** Air lacks a hub at either of its proposed gateways, it is unable to offer any “network benefits” in areas beyond the perimeter. Indeed, American **Trans** Air will provide new service and competition to **only two points** beyond the perimeter, Honolulu and **Kahului**, Hawaii, a large and medium hub under the FAA’s classifications. (**NWA103** and 104)

Congress was explicit in **Air 21** that the new slot exemptions should be allocated to domestic hub airports that will provide “domestic network benefits in areas beyond the perimeter”. American **Trans** Air’s proposal will benefit almost exclusively the already well-served and competitive **LAX-DCA** and **SFO-DCA** nonstop markets, and will provide minimal if any “network” benefits in the form of enhanced service or competition to communities located beyond the perimeter. American **Trans** Air, and the Los Angeles and San Francisco gateways, should not be allocated slot exemptions over Northwest/Seattle.

C. America West

America West seeks ten of the twelve available slot exemptions to operate two daily Las Vegas-DCA and three daily Phoenix-DCA nonstop flights, Phoenix and Las Vegas are primarily resort destinations and represent the smallest local O&D markets proposed in this proceeding (except that Phoenix is slightly larger than Salt Lake City, the gateway proposed by Delta). (NWA101) America West currently operates nonstop service to both Phoenix and Las Vegas via BWI, with four nonstop flights to Phoenix and two to Las Vegas. (NWA100) United also serves both of these markets via IAD (United operates two daily Las Vegas-LAD and one daily Phoenix-MD nonstop flights). (Id.) Las Vegas and Phoenix are both smaller local markets than Seattle, and unlike Seattle are primarily resort destinations. Yet, Las Vegas has comparable nonstop service to Seattle, and Phoenix has more. While United currently has a monopoly in the nonstop Seattle-Washington, D.C. market, America West currently competes with United in both the Phoenix-Washington, D.C. and Las Vegas-Washington, D.C. markets.

America West will offer inferior network benefits via Las Vegas compared to Northwest via Seattle. At Las Vegas, America West will offer onestop service to only 21 domestic cities located outside the perimeter, less than half of the 48 communities Northwest will serve onestop via Seattle. (NWA103) America West will introduce the first single connecting service to DCA for only one community, via Las Vegas, compared to the 21 communities that will receive first onestop access to DCA on Northwest via Seattle. (Id.) Not a single community will receive first competitive onestop service to

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Washington, D.C. via Las Vegas on America West. America West will offer **onestop** service to **DCA** for a total of **14** small and medium sized communities, compared to the **42** small and medium sized communities that will be served by Northwest via Seattle. America West is larger at Las Vegas, with **14%** of the total O&D **enplanements**, than Northwest at Seattle, with **8%** market share. Northwest/Seattle plainly should be selected over America West/Las Vegas.

Northwest's **DCA-SEA** proposal also will produce more compelling network benefits and enhanced competition than America West's **DCA-Phoenix** proposal. America West will offer **onestop** service to **fewer** communities than Northwest, introduce first **onestop** service to **DCA** for **fewer** communities than Northwest, introduce first competitive **onestop** service to **DCA** for **no** community (compared to Northwest's four), and open up **DCA** via **onestop** service to **fewer** small and medium sized communities than Northwest. (NWA103 and 104) America West is a **larger** incumbent at Phoenix, ranking second with **24%** of the O&D **enplanements**, compared to Northwest's ranking of third with **8%** market share at Seattle. (NWA106)

Northwest and Seattle should be selected before America West at Las Vegas or Phoenix.

D. Delta

Delta seeks four slot exemptions to operate two daily nonstop flights between Salt Lake City and **DCA**. Salt Lake City is the second smallest market without nonstop service to **DCA** proposed in this proceeding. (NWA101) Delta already operates double

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daily roundtrip service between Salt Lake City and IAD. (NWA100) Delta is the only carrier presently serving the Salt Lake City-Washington, D.C. nonstop market.

Allocation of additional flights to Delta will not enhance competition in this nonstop market, nor will it enhance competition among operators at either gateway. Delta is the second largest operator at DCA today, with 20% of the O&D enplanements, and the largest operator at Salt Lake City, with 52% of the total O&D enplanements. (NWA105 and 106)

Delta will offer fewer network benefits than Northwest at Seattle. Delta will provide 46 domestic U.S. markets with onestop service, two less than Northwest. (NWA103). Delta will introduce DCA onestop service to 16 communities beyond the perimeter, compared to the 21 communities that will gain their first onestop service to DCA under Northwest's proposal. (Id) Delta will not inject first competitive onestop service to a single onestop market. (Id.) Fewer small and medium sized communities will gain onestop access to DCA on Delta, via Salt Lake City, than on Northwest, via Seattle (39 for Delta compared to 42 for Northwest). (NWA104) Northwest/Seattle should be selected over Delta/Salt Lake City.

E. Frontier

Frontier seeks four daily slot exemptions to operate twice daily nonstop service between Denver and DCA. Frontier already operates twice daily nonstop service between Denver and BWI. (NWA100) United also serves Denver-Washington, D.C. (8

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flights at **IAD** and 2 at **BWI**). (Id.) In terms of existing nonstop service, Denver receives more service than any gateway in this proceeding with the exception of Los Angeles.

At Denver, Frontier has a total market share of **7%** based upon O&D **enplanements**, just slightly smaller than Northwest's **8%** at Seattle. (NWA106) Only 9 domestic cities will receive **onestop** service on Frontier via Denver, many of which already receive nonstop service to Washington, **D.C.** Indeed, Frontier will not offer a single community its first **onestop** service to **DCA**, nor will Frontier offer any community their first competitive **onestop** service to Washington, **D.C.** Frontier will offer **onestop** service to two medium hub airports, and no markets falling below this FAA classification. The Department should select Northwest/Seattle over Frontier/Denver.

F. National

National seeks six daily slot exemptions to operate three daily flights between Las Vegas and **DCA**. Las Vegas is a small resort market that already receives 4 daily nonstop flights to Washington, **D.C.** by two competitors (United operates 2 flights at **IAD** and America West operates 2 flights at **BWI**). (NWA100) While National would represent a new competitor in the nonstop market, National would offer essentially no "network benefits in areas beyond the perimeter", which is an express prerequisite under Air **21**. National's proposed **DCA-Las Vegas** nonstop flights will offer same day single connecting service for passengers in only two cities, Los Angeles and San Francisco, both of which are large hubs that already receive substantial nonstop service to Washington, **D.C.** (NWA103) Northwest/Seattle will offer superior network benefits

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than National at Las Vegas. In no event should Las Vegas be allocated three daily flights as proposed by National before the single daily **Seattle-DCA** service proposed by Northwest is granted.

G. TWA

TWA also proposes nonstop service to Los Angeles, seeking 6 daily slot exemptions to operate three daily flights. As discussed above, Los Angeles already receives more nonstop service to Washington, DC. by more competitors than any other gateway being proposed here. Other than competition in the nonstop market, TWA's proposal would produce essentially no network or competitive benefits of the form required under Air 21. TWA's proposed **DCA-LAX** nonstop service would convenience the smallest traffic base among the 11 carrier/gateway proposals in this proceeding. (NWA102) Only **Kona** and Honolulu would receive **onestop** access to **DCA** under TWA's proposal. (NWA103) Northwest's substantial competitive and network service benefits far outweigh the limited benefits to be derived under TWA's proposal.

H. United

Finally, United seeks four daily slot exemptions to operate twice daily **DCA-LAX** nonstop service. United already operates 12 daily flights between Washington' **D.C.** and Los Angeles (10 at **IAD** and 2 at **BWI**). (NWA100) American and **USAirways** also serve **DCA-LAX**, as discussed above. United is the largest incumbent at Los Angeles, with 23% of the O&D **enplanements**, and the largest incumbent at **IAD**, with 36% of the total O&D **enplanements**. (NWA105 and 106)

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Unlike United, Northwest will be a new competitor in the Washington, D.C.-Seattle nonstop market. Northwest will introduce **onestop DCA** service to **48** domestic cities beyond the perimeter, compared to United's **34**; provide **21** communities with first single connecting service to **DCA**, compared to United's **14**; and provide 4 cities with their first competitive **onestop** service to Washington' **D.C.**, whereas United will not inject first competitive **onestop** service in a single market. **(NWA103)** Northwest's Seattle hub will benefit more small and medium sized communities than United (**42** by Northwest compared to **28** by United). **(NWA104)** Northwest also will convenience a larger total traffic pool via Seattle than would United via Los Angeles. **(NWA102)**

There is no reasonable presentation of the facts that would justify an award to United for additional nonstop service between Washington, D.C. and LAX before authorizing Northwest to enter the Washington, D.C.-**Seattle** nonstop market to compete with United's current monopoly in that market.

III. An award to Northwest will permit Alaska Airlines to enter DCA

By selecting Northwest, the Department can "get two for the price of one." Should Northwest's application be successful in this proceeding, Northwest and Alaska Airlines intend to code-share on the flight. Alaska Airlines does not presently serve **DCA**, nor any point on the East Coast. Through code-sharing on Northwest's **DCA-Seattle** nonstop flight, Alaska Airlines will gain the ability to link its Seattle and Alaska networks to the Nation's Capital, thereby enabling Alaska Airlines to begin to **gain** presence on the East Coast.

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WHEREFORE, Northwest Airlines, Inc. **respectfully** requests that the Department grant Northwest two slot exemptions at **DCA** pursuant to Air 21, to enable Northwest to enter the **DCA-Seattle** nonstop market with a single daily flight.

Respectfully submitted,



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OTHER THAN RESORT DESTINATIONS, SEATTLE HAS THE 2ND LOWEST LEVEL OF SERVICE TO WASHINGTON, D.C.

| APPLICANT | MKT | No. of Proposed DCA Roundtrips | Existing IAD Nonstop Service | Existing BWI Nonstop Service | Total Existing Washington, D.C. (IAD+BWI) Nonstop Service |
|--------------------|-----|--------------------------------|------------------------------|------------------------------|---|
| American | LAX | 2 | 14 (UA-10/AA-4) | 4(UA-2/US-2) | 18 |
| American Trans Air | LAX | 1 | 14 (UA-10/AA-4) | 4(UA-2/US-2) | 18 |
| American Trans Air | SFO | 1 | 9 (UA) | 3(UA-1/US-2) | 12 |
| America West | LAS | 2 | 2 (UA) | 2(HP) | 4 |
| America West | PHX | 3 | 1 (UA) | 4(HP) | 5 |
| Delta | SLC | 2 | 2 (DL) | -- | 2 |
| Frontier | DEN | 2 | 8 (UA) | 8(F9-2/UA-6) | 16 |
| National | LAS | 3 | 2 (UA) | 2(HP) | 4 |
| Northwest | SEA | 1 | 4 (UA) | -- | 4 |
| TWA | LAX | 3 | 14 (UA-10/AA-4) | 4(UA-2/US-2) | 18 |
| United | LAX | 2 | 14 (UA-10/AA-4) | 4(UA-2/US-2) | 18 |

Source: Various DCA/Air 21 Applications, T100 Data(1EFeb00), WorldSpan-14Jun00 Schedule

**SEATTLE IS THE 5TH LARGEST MARKET WITHOUT NONSTOP SERVICE
TO DCA AND AMONG THE TOP 4 PROPOSED IN THIS PROCEEDING**

| Rank | Mkt | DCA-SEA Current Enplanements |
|-------------|------------|-------------------------------------|
| 1 | LAX | 164,755 |
| 2 | SFO | 151,629 |
| 3 | DEN | 136,031 |
| 4 | SAN | 110,631 |
| 5 | SEA | 108,656 |
| 6 | ABQ | 108,087 |
| 7 | SAT | 102,681 |
| 8 | AUS | 84,013 |
| 9 | PHX | 78,359 |
| 10 | SLC | 72,823 |
| 11 | LAS | 62,142 |

Source: DB1A/Superset Data YE3Q99

NORTHWEST'S SEATTLE NETWORK WILL CONVENIENCE THE THIRD LARGEST TRAFFIC BASE OF ALL THE CARRIER/GATEWAY PROPOSALS

| Rank | Airline | Market | Enplanements due to Proposed Nonstop | | |
|--------------|--------------------|----------------|--------------------------------------|------------------|------------------|
| | | | Sngl Conx | Nonstop | Total |
| 1 | Delta | DCA-SLC | 1,384,203 | 72,823 | 1,457,026 |
| 2 | America West | DCA-LAS | 1,283,921 | 62,142 | 1,346,063 |
| 3 | Northwest | DCA-SEA | 984,411 | 108,656 | 1,093,067 |
| 4 | United | DCA-LAX | 916,419 | 164,755 | 1,081,174 |
| 5 | Frontier | DCA-DEN | 912,836 | 136,031 | 1,048,867 |
| 6 | America West | DCA-PHX | 667,367 | 78,359 | 745,726 |
| 7 | American | DCA-LAX | 453,472 | 164,755 | 618,227 |
| 8 | National | DCA-LAS | 316,384 | 62,142 | 378,526 |
| 9 | American Trans Air | DCA-SFO | 53,249 | 151,629 | 204,878 |
| 10 | American Trans Air | DCA-LAX | 53,249 | 164,755 | 218,004 |
| 11 | TWA | DCA-LAX | 52,105 | 164,755 | 216,860 |
| TOTAL | | | 7,077,616 | 1,330,802 | 8,408,418 |

Source: T100 Data (YEFeb00), Superset Data (YE3Q99)

NORTHWEST'S DCA-SEA SERVICE WILL PROVIDE SUPERIOR NETWORK BENEFITS

| APPLICANT | MKT | Points w/ Same Day Conx | Existing O&D Total Traffic (Annual) | First Single Conx to DCA | First Competitive Single Conx to WASH, D.C. | Hub Categories | New DCA Entrant | Current IAD or BWI N/S Service |
|--------------------|---------|----------------------------|--|-----------------------------|--|----------------|--------------------|-----------------------------------|
| American | DCA-LAX | 13 Domestic | 164,755 | | | H | NO | YES |
| | | Bakersfield, CA | 1,734 | NO | NO | NH | | |
| | | Fresno, CA | 5,129 | NO | NO | SH | | |
| | | Honolulu, HI | 51,229 | NO | NO | H | | |
| | | Las Vegas, NV | 62,142 | NO | NO | H | | |
| | | Monterrey, CA | 2,031 | YES | NO | NH | | |
| | | Kahului, HI | 2,020 | NO | NO | MH | | |
| | | Palm Springs, CA | 6,772 | NO | NO | us | | |
| | | Reno, NV | 16,382 | NO | NO | MH | | |
| | | San Diego, CA | 110,631 | NO | NO | H | | |
| | | Santa Barbara, CA | 2,355 | YES | NO | SH | | |
| | | San Luis Obispo, CA | 673 | YES | NO | NH | | |
| | | San Francisco, CA | 151,629 | NO | NO | H | | |
| | | San Jose, CA | 40,745 | NO | NO | MH | | |
| | | TOTAL CONXENPLNMTS | 463,472 | 5,069 | 0 | | | |
| American Trans Air | DCA-LAX | 2 Domestic | 164,755 | | | H | NO | NO |
| | | Honolulu, HI | 51,229 | NO | NO | H | | |
| | | Kahului, HI | 2,020 | NO | NO | MH | | |
| | | TOTAL CONXENPLNMTS | 63,249 | 0 | 0 | | | |
| American Trans Air | DCA-SFO | 2 Domestic | 151,629 | | | H | NO | NO |
| | | Honolulu, HI | 51,229 | NO | NO | H | | |
| | | Kahului, HI | 2,020 | NO | NO | MH | | |
| | | TOTAL CONX ENPLNMTS | 63,249 | 0 | 0 | | | |
| America West | DCA-LAS | 21 Domestic | 62,142 | | | H | NO | YES |
| | | Bakersfield, CA | 1,734 | NO | NO | NH | | |
| | | Denver, CO | 136,031 | NO | NO | H | | |
| | | El Paso, TX | 27,947 | NO | NO | MH | | |
| | | Spokane, WA | 9,428 | NO | NO | SH | | |
| | | Los Angeles, CA | 164,755 | NO | ND | H | | |
| | | Oakland, CA | 20,254 | NO | NO | MH | | |
| | | Omaha, NE | 88,558 | NO | NO | MH | | |
| | | Ontario, CA | 34,193 | NO | NO | MH | | |
| | | Portland, OR | 55,754 | NO | NO | MH | | |
| | | Phoenix, AZ | 78,359 | NO | NO | H | | |
| | | Palm Springs, CA | 6,772 | NO | NO | SH | | |
| | | Reno, NV | 16,382 | NO | NO | MH | | |
| | | San Diego, CA | 110,631 | NO | NO | H | | |
| | | Santa Barbara, CA | 2,355 | YES | NO | SH | | |
| | | Seattle, WA | 108,656 | NO | NO | H | | |
| | | San Francisco, CA | 151,629 | NO | NO | H | | |
| | | San Jose, CA | 40,745 | NO | NO | MH | | |
| | | Salt Lake City, UT | 72,823 | NO | NO | H | | |
| | | Sacramento, CA | 39,169 | NO | NO | MH | | |
| | | Santa Ana, CA | 63,637 | NO | NO | MH | | |
| | | Tucson, AZ | 54,109 | NO | NO | MH | | |
| | | TOTAL CONXENPLNMTS | 1,283,921 | 2,356 | 0 | | | |

NORTHWEST'S DCA-SEA SERVICE WILL PROVIDE SUPERIOR NETWORK BENEFITS

| APPLICANT | MKT | Points w/ Same Day Conx | Existing O&D Total Traffic (Annual) | First Single Conx to DCA | First Competitive Single Conx to WASH, D.C. | Hub Categories | New DCA Entrant | Current IAD or BWI/MS Service |
|----------------------------|---------|----------------------------|--|-----------------------------|--|----------------|--------------------|----------------------------------|
| America West | DCA-PHX | 46 Domestic | 78,359 | | | | | |
| | | Albuquerque, NM | 108,087 | NO | NO | H | NO | NO |
| | | Anchorage, AK | 19,730 | NO | NO | MH | | |
| | | Aspen, CO | 1,488 | NO | NO | MH | | |
| | | Bakersfield, CA | 1,734 | NO | NO | NH | | |
| | | Boise, ID | 8,638 | NO | NO | SH | | |
| | | Burbank, CA | 2,203 | NO | NO | MH | | |
| | | Carlsbad, CA | 328 | YES | NO | N/A | | |
| | | Colorado Springs, CO | 41,824 | NO | NO | MH | | |
| | | Denver, CO | 136,031 | NO | NO | H | | |
| | | Durango, CO | 542 | NO | NO | NH | | |
| | | Vail/Eagle, CO | 2,670 | NO | NO | NH | | |
| | | El Paso, TX | 27,947 | NO | NO | MH | | |
| | | Eugene, OR | 1,873 | YES | NO | SH | | |
| | | Fresno, CA | 5,129 | NO | NO | SH | | |
| | | Ft Huachuca, AZ | 208 | YES | NO | NH | | |
| | | Flagstaff, AZ | 475 | YES | NO | NH | | |
| | | Farmington, NM | 500 | YES | NO | NH | | |
| | | Spokane, WA | 9,428 | NO | NO | NH | | |
| | | Grand Junction, CO | 649 | YES | NO | SH | | |
| | | Gunnison, CO | 336 | YES | NO | NH | | |
| | | Gallup, NM | 59 | YES | NO | VS | | |
| | | Hayden, CO | 1,177 | NO | NO | NH | | |
| | | Lake Havasu City, AZ | 78 | YES | NO | NH | | |
| | | Laughlin, AZ | 38 | YES | NO | NH | | |
| | | Las Vegas, NV | 62,142 | NO | NO | H | | |
| | | Los Angeles, CA | 184,755 | NO | NO | H | | |
| | | Long Beach, CA | 1,574 | NO | NO | NH | | |
| | | Micland, Texas | 3,642 | NO | NO | SH | | |
| | | Monterrey, CA | 2,031 | YES | NO | NH | | |
| | | Montrose, CO | 1,309 | YES | NO | NH | | |
| | | Oakland, CA | 20,254 | NO | NO | MH | | |
| | | Ontario, CA | 34,193 | NO | NO | MH | | |
| | | Portland, OR | 55,754 | NO | NO | MH | | |
| | | Prescott, AZ | 0 | YES | NO | VS | | |
| | | Palm Springs, CA | 6,772 | NO | NO | SH | | |
| | | Reno, NV | 16,382 | NO | NO | MH | | |
| | | San Diego, CA | 110,631 | NO | NO | H | | |
| | | Santa Barbara, CA | 2,355 | YES | NO | SH | | |
| | | Seattle, WA | 108,656 | NO | NO | H | | |
| | | San Francisco, CA | 151,629 | NO | NO | H | | |
| | | San Jose, CA | 40,745 | NO | NO | MH | | |
| | | Salt Lake City, UT | 72,823 | NO | NO | H | | |
| | | Sacramento, CA | 38,169 | NO | NO | MH | | |
| | | Santa Ana, CA | 63,637 | NO | NO | MH | | |
| | | Tucson, AZ | 54,109 | NO | NO | MH | | |
| | | Yuma, AZ | 459 | YES | NO | NH | | |
| TOTAL CONX ENPLMNTS | | | 667,367 | 10,688 | 0 | | | |

NORTHWEST'S DCA-SEA SERVICE WILL PROVIDE SUPERIOR NETWORK BENEFITS

| APPLICANT | MKT | Points w/ Same Day Conn | Existing O&D Total Traffic (Annual) | First Single Conn to DCA | First Competitive Single Conn to WASH, D.C. | Hub Categories | New DCA Enfrant | Current IAD or BWI NIS Service |
|----------------------------|---------|----------------------------|--|-----------------------------|--|----------------|--------------------|-----------------------------------|
| Delta | DCA-SLC | 46 Domestic | 72,823 | | | H | NO | YES |
| | | Albuquerque | 108,087 | NO | NO | MH | | |
| | | Anchorage, AK | 19,730 | NO | NO | MH | | |
| | | Austin, TX | 84,013 | NO | NO | MH | | |
| | | Billings, MT | 7,368 | NO | NO | NH | | |
| | | Boise, ID | 8,638 | NO | NO | SH | | |
| | | Butte, MT | 623 | YES | NO | NH | | |
| | | Bozeman, MT | 5,790 | NO | NO | NH | | |
| | | Cedar City, UT | 113 | YES | NO | VS | | |
| | | Cody, WY | 219 | YES | NO | NH | | |
| | | Colorado Springs, CO | 41,824 | NO | NO | MH | | |
| | | Casper, WY | 948 | YES | NO | NH | | |
| | | Denver, CO | 136,031 | NO | NO | H | | |
| | | Elko, NV | 112 | YES | NO | NH | | |
| | | Fresno, CA | 5,129 | NO | NO | SH | | |
| | | Kailspell, MT | 1,378 | NO | NO | NH | | |
| | | Spokane, WA | 9,428 | NO | NO | SH | | |
| | | Grand Junction, CO | 649 | YES | NO | NH | | |
| | | Great Falls, MT | 4,180 | NO | NO | NH | | |
| | | Helena, MT | 2,569 | YES | NO | NH | | |
| | | Idaho Falls, ID | 2,417 | YES | NO | NH | | |
| | | Jackson Hole, WY | 4,011 | YES | NO | NH | | |
| | | Las Vegas, NV | 62,142 | NO | NO | H | | |
| | | Los Angeles, CA | 164,755 | NO | NO | H | | |
| | | Missoula, MT | 5,483 | NO | NO | NH | | |
| | | Oakland, CA | 20,254 | NO | NO | MH | | |
| | | Ontario, CA | 34,193 | NO | NO | MH | | |
| | | Portland, OR | 55,754 | NO | NO | MH | | |
| | | Phoenix, AZ | 78,359 | NO | NO | H | | |
| | | Pocatello, ID | 513 | YES | NO | NH | | |
| | | Pasco, WA | 2,026 | YES | NO | NH | | |
| | | Palm Springs, CA | 6,772 | NO | NO | SH | | |
| | | Rapid City, SD | 7,847 | NO | NO | NH | | |
| | | Reno, NV | 16,382 | NO | NO | MH | | |
| | | San Diego, CA | 110,631 | NO | NO | H | | |
| | | Seattle, WA | 108,656 | NO | NO | H | | |
| | | San Francisco, CA | 151,629 | NO | NO | H | | |
| | | St George, UT | 161 | YES | NO | NH | | |
| | | San Jose, CA | 40,745 | NO | NO | MH | | |
| | | Sacramento, CA | 39,169 | NO | NO | MH | | |
| | | Santa Ana, CA | 63,637 | NO | NO | MH | | |
| | | Sun Valley, ID | 393 | YES | NO | NH | | |
| | | Tulsa, OK | 26,871 | NO | NO | MH | | |
| | | Tucson, AZ | 54,109 | NO | NO | MH | | |
| | | Twin Falls, ID | 253 | YES | NO | NH | | |
| | | Vernal, UT | 42 | YES | NO | N/A | | |
| | | West Yellowstone, WY | 0 | YES | NO | VS | | |
| TOTAL CONX ENPLNMTS | | | 1,384,203 | 15,049 | 0 | | | |

NORTHWEST'S DCA-SEA SERVICE WILL PROVIDE SUPERIOR NETWORK BENEFITS

| APPLICANT | MKT | Points w/ Same Day Conx | Existing O&D Total Traffic (Annual) | First Single Conx to DCA | First Competitive Single Conx to WASH, D.C. | Hub Categories | New DCA Entrant | Current IAD or BWI N/S Service |
|----------------------------|---------|----------------------------|--|-----------------------------|--|----------------|--------------------|-----------------------------------|
| Frontier | DCA-DEN | 9 Domestic | 136,031 | | | H | Y E S | YES |
| | | Albuquerque, NM | 108,087 | NO | NO | MH | | |
| | | Las Vegas, NV | 62,142 | NO | NO | H | | |
| | | Los Angeles, CA | 164,755 | NO | NO | H | | |
| | | Portland, OR | 55,754 | NO | NO | MH | | |
| | | Phoenix, AZ | 78,359 | NO | NO | H | | |
| | | San Diego, CA | 110,631 | NO | NO | H | | |
| | | Seattle, WA | 108,656 | NO | NO | H | | |
| | | San Francisco, CA | 151,629 | NO | NO | H | | |
| | | Salt Lake City, UT | 72,823 | NO | NO | H | | |
| TOTAL CONX ENPLNMTS | | 912,836 | 0 | 0 | | | | |
| National | DCA-LAS | 2 Domestic | 62,142 | | | H | Y E S | NO |
| | | Los Angeles, CA | 164,755 | NO | NO | H | | |
| | | San Francisco, CA | 151,629 | NO | NO | H | | |
| TOTAL CONX ENPLNMTS | | 316,384 | 0 | 0 | | | | |
| Northwest | DCA-SEA | 48 Domestic | 108,656 | | | H | NO | NO |
| | | Walla Walla, WA | 192 | YES | NO | NH | | |
| | | Anchorage, AK | 19,730 | NO | NO | MH | | |
| | | Billings, MT | 7,368 | NO | NO | NH | | |
| | | Bellingham, WA | 805 | YES | NO | NH | | |
| | | Boise, ID | 8,638 | NO | NO | SH | | |
| | | Butte, MT | 623 | YES | YES | NH | | |
| | | Burbank, CA | 2,203 | NO | NO | MH | | |
| | | Bozeman, MT | 5,790 | NO | NO | NH | | |
| | | Port Angeles, WA | 240 | YES | NO | NH | | |
| | | Wenatchee, WA | 321 | YES | NO | NH | | |
| | | Eastsound, WA | 0 | YES | NO | us | | |
| | | Eugene, OR | 1,873 | YES | NO | SH | | |
| | | Fairbanks, AK | 2,925 | NO | NO | SH | | |
| | | Fresno, CA | 5,129 | NO | NO | SH | | |
| | | Kalispell, MT | 1,378 | NO | NO | NH | | |
| | | Friday Harbor, WA | 0 | YES | NO | us | | |
| | | Spokane, WA | 9,428 | NO | NO | SH | | |
| | | Great Falls, MT | 4,180 | NO | NO | NH | | |
| | | Helena, MT | 2,569 | YES | YES | NH | | |
| | | Honolulu, HI | 51,229 | NO | NO | H | | |
| | | Idaho Falls, ID | 2,417 | NO | NO | NH | | |
| | | Juneau, AK | 998 | YES | NO | SH | | |
| | | Ketchikan, AK | 299 | YES | NO | NH | | |
| | | Las Vegas, NV | 62,142 | NO | NO | H | | |
| | | Los Angeles, CA | 164,755 | NO | NO | H | | |
| | | Lewiston, ID | 342 | YES | NO | NH | | |
| | | Medford, OR | 955 | YES | NO | NH | | |
| | | Missoula, MT | 5,483 | NO | NO | NH | | |
| | | Moses Lake, WA | 18 | YES | NO | NH | | |
| | | Oakland, CA | 20,254 | NO | NO | MH | | |
| | | Oak Harbor, WA | 48 | YES | NO | us | | |
| | | Ontario, CA | 34,193 | NO | NO | MH | | |
| Portland, OR | 55,754 | NO | NO | MH | | | | |
| Phoenix, AZ | 78,359 | NO | NO | H | | | | |

Northwest continued on next page

NORTHWEST'S DCA-SEA SERVICE WILL PROVIDE SUPERIOR NETWORK BENEFITS

| APPLICANT | MKT | Points w/ Same Day Conx | Existing O&D Total Traffic (Annual) | First Single Conx to DCA | First Competitive Single Conx to WASH, D.C. | Hub Categories | New DCA Entrant | Current IAD or BWI/N/S Service | | |
|---------------------------|---------|----------------------------|--|-----------------------------|--|----------------|--------------------|-----------------------------------|----|----|
| Northwest continued | DCA-SEA | Pasco, WA | 2,026 | YES | YES | NH | | | | |
| | | Palm Springs, CA | 6,772 | NO | NO | SH | | | | |
| | | Pullman, WA | 601 | YES | NO | NH | | | | |
| | | Redmond, OR | 581 | YES | NO | NH | | | | |
| | | Reno, NV | 16,382 | NO | NO | MH | | | | |
| | | San Diego, CA | 110,631 | NO | NO | H | | | | |
| | | San Francisco, CA | 151,629 | NO | NO | H | | | | |
| | | Sitka, AK | 236 | YES | NO | NH | | | | |
| | | San Jose, CA | 40,745 | NO | NO | MH | | | | |
| | | Sacramento, CA | 39,169 | NO | NO | MH | | | | |
| | | Santa Ana, CA | 63,637 | NO | NO | MH | | | | |
| | | Sun Valley, ID | 393 | NO | NO | NH | | | | |
| | | Yakima, WA | 728 | YES | NO | NH | | | | |
| | | Yellowstone, WY | 243 | YES | YES | VS | | | | |
| | | TOTAL CONXENPLNMTS | | 964,411 | 13,696 | 6,461 | | | | |
| | | TWA | DCA-LAX | 2 Domestic | 164,755 | | | H | NO | NO |
| | | | | Kona, HI | 876 | YES | NO | N/A | | |
| Honolulu, HI | 51,229 | | | NO | NO | H | | | | |
| TOTAL CONXENPLNMTS | | 62,106 | 876 | 0 | | | | | | |
| United | DCA-LAX | 34 Domestic | 164,755 | | | H | NO | YES | | |
| | | Bakersfield, CA | 1,734 | NO | NO | NH | | | | |
| | | Carlsbad, CA | 328 | YES | NO | VS | | | | |
| | | Fresno, CA | 5,129 | NO | NO | SH | | | | |
| | | Honolulu, HI | 51,229 | NO | NO | H | | | | |
| | | Imperial, CA | 120 | YES | NO | NH | | | | |
| | | Inyokern, CA | 161 | YES | NO | NH | | | | |
| | | Jackson Hole, WY | 4,011 | YES | NO | NH | | | | |
| | | Kona, HI | 876 | YES | NO | SH | | | | |
| | | Las Vegas, NV | 62,142 | NO | NO | H | | | | |
| | | Lihue, HI | 1,051 | YES | NO | SH | | | | |
| | | Merced, CA | 30 | NO | NO | VS | | | | |
| | | Medford, OR | 955 | NO | NO | NH | | | | |
| | | Monterrey, CA | 2,031 | YES | NO | NH | | | | |
| | | Oakland, CA | 20,254 | NO | NO | MH | | | | |
| | | Kahului, HI | 2,020 | NO | NO | MH | | | | |
| | | Ontario, CA | 34,193 | NO | NO | MH | | | | |
| | | Oxnard, CA | 358 | YES | NO | NH | | | | |
| | | Portland, OR | 55,754 | NO | NO | MH | | | | |
| | | Phoenix, AZ | 78,359 | NO | NO | H | | | | |
| | | Palm Springs, CA | 6,772 | NO | NO | SH | | | | |
| | | Reno, NV | 16,382 | NO | NO | MH | | | | |
| | | San Diego, CA | 110,631 | NO | NO | H | | | | |
| | | Santa Barbara, CA | 2,355 | YES | NO | SH | | | | |
| | | San Luis Obispo, CA | 673 | YES | NO | NH | | | | |
| | | Seattle, WA | 108,656 | NO | NO | H | | | | |
| | | San Francisco, CA | 151,629 | NO | NO | H | | | | |
| | | St George, UT | 161 | YES | NO | NH | | | | |
| | | San Jose, CA | 40,745 | NO | NO | MH | | | | |
| | | Sacramento, CA | 39,169 | NO | NO | MH | | | | |
| | | Santa Maria, CA | 259 | YES | NO | NH | | | | |
| | | Santa Ana, CA | 63,637 | NO | NO | MH | | | | |
| | | Tucson, AZ | 54,109 | NO | NO | MH | | | | |
| | | Visalia, CA | 49 | YES | NO | NH | | | | |
| Yuma, AZ | 459 | YES | NO | NH | | | | | | |
| TOTAL CONXENPLNMTS | | 916,419 | 12,690 | | | | | | | |

Note: H=Hub, MH=Medium Hub, SH=Small Hub, NH=Non-Hub, VS=Very Small (<10,000 enplanements per year), N/A = International Airport (Data not available from D.O.T. Report)
 Note: Enplanements = N/A (Data not available for Non-North America Airports)

Source: Various OA Air-21 Applications, T100 Data (YEFeb00), Supersat Data (YE3Q99), D.O.T. Primary Airport Enplanement Activity Summary (CY1997)

NORTHWEST/SEATTLE WILL PROVIDE MORE SMALL AND MEDIUM SIZED COMMUNITIES WITH ONESTOP SERVICE TO DCA THAN ANY OTHER APPLICANT

| | Gateway | Very Small | Non-Hub | Small Hub | Medium Hub | Total |
|--------------------|------------|------------|-----------|-----------|------------|-----------|
| American | LAX | 1 | 3 | 2 | 3 | 9 |
| American Trans Air | LAX | 0 | 0 | 0 | 1 | 1 |
| American Trans Air | SFO | 0 | 0 | 0 | 1 | 1 |
| America West | LAS | 0 | 1 | 3 | 10 | 14 |
| America West | PHX | 3 | 16 | 7 | 13 | 39 |
| Delta | SLC | 3 | 19 | 4 | 13 | 39 |
| Frontier | DEN | 0 | 0 | 0 | 2 | 2 |
| National | LAS | 0 | 0 | 0 | 0 | 0 |
| Northwest | SEA | 4 | 22 | 7 | 9 | 42 |
| TWA | LAX | 1 | 0 | 0 | 0 | 1 |
| United | LAX | 2 | 12 | 5 | 9 | 28 |

Enplanement Range Per FAA Primary Airport Enplanement Activity Summary (CY1997)

| | |
|-------------|---------------|
| Hub | > 6.4M |
| Medium Hub | 1.6M to 6.39M |
| Small Hub | 320k to 1.59M |
| Non-Hub | 10k to 319k |
| *Very Small | < 10k |

*Not listed in FAA Primary Airport Enplanement Activity Summary (CY1997) due to less than 10,000 enplanements

GRANTING NORTHWEST TWO BEYOND-PERIMETER SLOTS TO OPERATE NONSTOP DCA-SEA WILL ENHANCE COMPETITION AT NATIONAL AND AT WASHINGTON, D.C. AREA AIRPORTS COMBINED

- . Northwest Airlines ranks 4th in terms of enplanements at DCA, at 8% of total
- . Northwest ranks 5th in terms of enplanements at DCA and IAD combined, at 6% of total
- . Northwest ranks 6th in terms of enplanements at DCA, IAD, and BWI combined, at 6% of total

| DCA | | | | | DCA+IAD | | | | | DCA+IAD+BWI | | | | |
|-------|------------------|------------|--------|------------|---------|------------------|------------|--------|------------|-------------|------------------|------------|--------|------------|
| RANK | AIRLINE | ENPLNMTS | PDEW | % of Total | RANK | AIRLINE | ENPLNMTS | PDEW | % of Total | RANK | AIRLINE | ENPLNMTS | PDEW | % of Total |
| 1 | US Airways | 4,076,662 | 5,584 | 28% | 1 | United | 6,132,030 | 8,400 | 28% | 1 | US Airways | 9,632,322 | 13,195 | 27% |
| 2 | Delta | 2,466,189 | 3,366 | 20% | 2 | US Airways | 5,743,717 | 7,868 | 26% | 2 | United | 6,626,706 | 9,078 | 18% |
| 3 | American | 1,726,735 | 2,366 | 14% | 3 | Delta | 3,843,636 | 5,266 | 17% | 3 | Delta | 4,864,894 | 6,664 | 14% |
| 4 | Northwest | 1,021,764 | 1,400 | 8% | 4 | American | 2,676,836 | 3,630 | 12% | 4 | Southwest | 3,829,291 | 5,246 | 11% |
| 5 | Continental | 981,527 | 1,345 | 8% | 6 | Northwest | 1,307,004 | 1,790 | 6% | 6 | American | 3,299,647 | 4,520 | 9% |
| 6 | United | 844,613 | 1,167 | 7% | 6 | Continental | 1,175,299 | 1,610 | 5% | 6 | Northwest | 2,176,319 | 2,980 | 6% |
| 7 | TWA | 524,804 | 719 | 4% | 7 | TWA | 701,080 | 960 | 3% | 7 | Continental | 1,924,326 | 2,636 | 5% |
| 6 | Various Canadian | 195,700 | 268 | 2% | 6 | Airtran | 445,052 | 610 | 2% | 8 | TWA | 1,263,039 | 1,730 | 4% |
| 9 | Midwest Express | 187,863 | 257 | 2% | 9 | Various Canadian | 302,030 | 414 | 1% | 9 | America West | 611,944 | 838 | 2% |
| 10 | America West | 84,828 | 116 | 1% | 10 | Midwest Express | 191,333 | 262 | 1% | 10 | Airtran | 445,058 | 610 | 1% |
| 11 | Midway | 83,915 | 115 | 1% M1%a | 11 | America West | 133,766 | 183 | 1% | 11 | Various Canadian | 345,860 | 474 | 1% |
| TOTAL | | 12,264,420 | 16,787 | | TOTAL | | 22,066,729 | 30,227 | | TOTAL | | 36,926,623 | 49,216 | |

Source: DB1A/Superset Data YE3Q99

GRANTING NORTHWEST TWO BEYOND-PERIMETER SLOTS TO OPERATE NONSTOP DCA-SEA WILL ENHANCE COMPETITION AT SEATTLE-TACOMA INTERNATIONAL AIRPORT SUBSTANTIALLY MORE THAN AN AWARD OF SLOTS TO AMERICA WEST, AMERICAN, DELTA, OR UNITED AT THEIR PROPOSED GATEWAY AIRPORTS

- Northwest Airlines ranks a distant third in terms of enplanements at SEA, carrying only 8% of total
- America West, American, Delta, and United are substantially larger at each of their proposed gateways
- Frontier operates 7% of the total enplanements at Denver, just slightly less than Northwest's 8% at SEA

| DEN | | | | | LAS | | | | | LAX | | | | |
|------|--------------------|------------|--------|------------|------|--------------------|------------|--------|------------|------|--------------------|------------|--------|-------------|
| RANK | AIRLINE | ENPLNMTS | PDEW | % of Total | RANK | AIRLINE | ENPLNMTS | PDEW | % of Total | RANK | AIRLINE | ENPLNMTS | PDEW | In of Total |
| 1 | United | 9,476,261 | 12,981 | 54% | 1 | Southwest | 7,596,014 | 10,405 | 33% | 1 | United | 8,198,175 | 12,602 | 28% |
| 2 | Delta | 1,578,621 | 2,162 | 9% | 2 | America West | 3,379,841 | 4,830 | 14% | 2 | Southwest | 6,004,754 | 8,226 | 16% |
| 3 | American | 1,311,886 | 1,797 | 8% | 3 | United | 2,564,498 | 3,513 | 11% | 3 | American | 6,413,165 | 7,415 | 15% |
| 4 | Frontier | 1,224,100 | 1,677 | 7% | 4 | Delta | 2,210,383 | 3,028 | 9% | 4 | Delta | 3,342,561 | 4,579 | 9% |
| 5 | Continental | 842,129 | 1,154 | 5% | 5 | American | 2,140,452 | 2,932 | 9% | 5 | Alaska | 1,789,264 | 2,451 | 5% |
| 6 | Northwest | 750,047 | 1,027 | 4% | 6 | Continental | 1,105,110 | 1,514 | 5% | 6 | Continental | 1,781,783 | 2,441 | 5% |
| 6 | US Airways | 475,271 | 651 | 3% | 7 | Northwest | 959,447 | 1,314 | 4% | 7 | Various Mexican | 1,483,658 | 2,032 | 4% |
| 6 | TWA | 438,171 | 600 | 3% | 8 | Alaska | 776,343 | 1,063 | 3% | a | Northwest | 1,441,228 | 1,974 | 4% |
| 9 | America West | 385,247 | 528 | 2% | 9 | TWA | 560,920 | 768 | 2% | 9 | America West | 1,399,534 | 1,917 | 4% |
| 10 | Vanguard | 323,650 | 443 | 2% | 10 | FE | 408,457 | 560 | 2% | 10 | US Airways | 1,174,269 | 1,609 | 3% |
| 11 | American Trans Air | 225,211 | 309 | 1% | 11 | US Airways | 363,022 | 497 | 2% | 11 | TWA | 899,020 | 1,232 | 2% |
| | TOTAL | 17,431,446 | 23,879 | | 12 | American Trans Air | 352,679 | 483 | 2% | 12 | Various Canadian | 746,200 | 1,022 | 2% |
| | | | | | 13 | National | 231,668 | 317 | 1% | 13 | American Trans Air | 702,460 | 962 | 2% |
| | | | | | | TOTAL | 23,336,340 | 31,988 | | | TOTAL | 37,276,321 | 61,063 | |

| PHX | | | | | SEA | | | | | SFO | | | | | SLC | | | | |
|------|--------------|------------|--------|------------|------|--------------|------------|--------|------------|------|--------------------|------------|--------|------------|------|--------------|-----------|--------|------------|
| RANK | AIRLINE | ENPLNMTS | PDEW | % of Total | RANK | AIRLINE | ENPLNMTS | PDEW | % of Total | RANK | AIRLINE | ENPLNMTS | PDEW | % of Total | RANK | AIRLINE | ENPLNMTS | PDEW | % of Total |
| 1 | Southwest | 6,429,071 | 8,807 | 31% | 1 | Alaska | 6,739,923 | 9,233 | 35% | 1 | United | 11,023,451 | 15,101 | 46% | 1 | Delta | 4,899,260 | 6,711 | 66% |
| 2 | America West | 4,832,499 | 6,620 | 24% | 2 | United | 3,169,392 | 4,342 | 17% | 2 | American | 2,091,906 | 2,866 | 9% | 2 | Southwest | 1,665,018 | 2,281 | 19% |
| 3 | United | 2,034,407 | 2,787 | 10% | 3 | Northwest | 1,644,660 | 2,116 | 8% | 3 | Delta | 1,860,607 | 2,549 | a% | 3 | United | 813,925 | 1,115 | 9% |
| 4 | Delta | 1,501,516 | 2,057 | 7% | 4 | American | 1,542,239 | 2,113 | a% | 4 | Continental | 1,222,516 | 1,675 | 5% | 4 | American | 404,703 | 554 | 5% |
| 5 | American | 1,216,209 | 1,666 | 6% | 5 | Southwest | 1,478,052 | 2,025 | a% | 5 | Northwest | 1,153,570 | 1,580 | 5% | 5 | TWA | 262,414 | 359 | 3% |
| 6 | Northwest | 1,041,881 | 1,427 | 5% | 6 | Southwest | 1,789,816 | 2,452 | 9% | 6 | Alaska | 1,052,029 | 1,441 | 4% | 6 | Continental | 257,767 | 353 | 3% |
| 7 | Alaska | 727,401 | 996 | 4% | 7 | Continental | 579,300 | 794 | 3% | 7 | US Airways | 958,684 | 1,313 | 4% | 7 | Northwest | 256,180 | 351 | 3% |
| 8 | Continental | 717,398 | 983 | 3% | a | US Airways | 437,945 | 600 | 2% | a | Southwest | 807,347 | 1,106 | 3% | a | America West | 245,913 | 337 | 3% |
| 9 | US Airways | 536,241 | 735 | 3% | a | TWA | 461,609 | 632 | 2% | 9 | America West | 717,118 | 982 | 3% | 9 | Frontier | 122,219 | 167 | 1% |
| 10 | TWA | 458,314 | 628 | 2% | 10 | America West | 507,241 | 695 | 3% | 10 | TWA | 596,369 | 817 | 2% | 10 | Alaska | 9,902 | 14 | 0% |
| | TOTAL | 20,603,917 | 28,088 | | 11 | Hawaiian | 277,790 | 381 | 1% | 11 | American Trans Air | 476,188 | 662 | 2% | | TOTAL | 8,972,617 | 12,291 | |
| | | | | | 12 | Frontier | 197,612 | 271 | 1% | | TOTAL | 24,026,396 | 32,913 | | | | | | |
| | | | | | | TOTAL | 19,136,682 | 26,216 | | | | | | | | | | | |

source: DB1A/Superset Date YE3Q99

Certificate of Service

I hereby certify that on this **22nd** day of May, **2000**, I served a copy of the foregoing document of Northwest Airlines on the following individuals by first class mail, postage prepaid:

Joanne W. Young
Baker & Hostetler, LLP
One Washington Square, Suite 1100
1050 Connecticut Avenue, N.W.
Washington, D.C. 20036-5304
(For America West)

Carl B. Nelson, Jr
Associate General Counsel
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