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DEPT. OF TRANSPORTATION

BEFORE THE
DEPARTMENT OF TRANSPORTATION

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WASHINGTON, D. C.

Joint Application of :
 :
 AMERICAN AIRLINES, INC. and :
 THE TACA GROUP :
 :
 for approval of and antitrust immunity :
 for an alliance agreement and exemp- :
 tions under 49 USC 41308 and 41309 :

OST-00-7088 -17

AMERICAN AIRLINES, INC. et al. AND :
 THE TACA GROUP RECIPROCAL CODESHARE :
 SERVICES PROCEEDING :

OST-96-1700 -163

MOTION OF AMERICAN AIRLINES, INC. FOR CONFIDENTIAL
TREATMENT OF DOCUMENTS UNDER 14 CFR 302.12 AND
RESPONSE TO LETTER FROM OFFICE OF AVIATION ANALYSIS

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April 11, 2001

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DEPARTMENT OF TRANSPORTATION
WASHINGTON, D. C.

Joint Application of :
 :
 AMERICAN AIRLINES, INC. and : OST-00-7088
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 SERVICES PROCEEDING :

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TREATMENT OF DOCUMENTS UNDER 14 CFR 302.12 AND
RESPONSE TO LETTER FROM OFFICE OF AVIATION ANALYSIS

American Airlines, Inc., under 14 CFR 302.12, hereby moves that the Department withhold certain proprietary and commercially sensitive confidential information from public disclosure. American is separately submitting such information in response to the letter of March 26, 2001 from the Director, Office of Aviation Analysis (Attachment 1).

The Director's letter revised item 3 to the Department's evidence request in Order 2000-7-8, July 7, 2000.

Original item 3 read as follows:

"3. Provide analysis/information that shows the extent to which traffic and revenue forecasts for this arrangement will be stimulated versus diverted from other U.S. carriers."

Revised item 3 now reads:

"3. [P]rovide the Department with all studies, analyses, reports, and information (on any media, formal or informal) that were produced since May 20, 1998, prepared for officers, directors, or individuals exercising similar functions by internal staff or third parties acting on its behalf, that evaluate or analyze the proposed relationship with respect to competition, competitors, potential for traffic growth or expansion into geographic markets, and the extent to which traffic and market forecasts/shares and revenue forecasts/shares for the proposed arrangement will be stimulated versus diverted from other U.S. airlines and indicate (if not contained in the document itself) the date of preparation, and the name and title of each individual who prepared such document."

American has identified 28 documents that it submitted in its response of February 28, 2001 to Order 2000-7-8 that are responsive to revised item 3. These 28 documents are listed in Attachment 2 by document number, date, preparer, and title. American has identified two additional documents that are being submitted with this motion. These two documents are also listed in Attachment 2 (2231-2249; 2250-2267).

The two additional documents should be granted confidential treatment for all the reasons stated in the joint motion of American and the TACA Group under 14 CFR 302.12, submitted in OST-00-7088 on March 17, 2000, which we hereby incorporate by reference.

In accordance with 14 CFR 302.12(d)(1)(i), the two additional documents for which we seek protection are listed in Attachment 2 (2231-2249; 2250-2267). These documents are being submitted in sealed envelopes labeled "Confidential Treatment Requested Under 14 CFR 302.12; Access Is Limited To Counsel And Outside Experts Who Have Filed Proper Confidentiality Affidavits."

American urges the Department to issue a scheduling order on an expedited basis, so that the public may begin to enjoy the benefits of enhanced services and increased competition that the proposed American/TACA Group alliance will offer.

Respectfully submitted,



CARL B. NELSON, JR.
Associate General Counsel
American Airlines, Inc.

April 11, 2001



**U.S. Department of
Transportation**
Office of the Secretary
of Transportation

400 Seventh St., S.W.
Washington, D.C. 20590

MAR 26 2001

Mr. Carl B. Nelson, Jr.
Associate General Counsel
American Airlines, Inc.
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Dear Mr. Nelson:

On March 17, 2000, American Airlines and the TACA Group airlines filed a joint application for approval of and antitrust immunity for an Alliance Agreement dated September 27, 1996, Docket OST-2000-7088. On the same date, these parties also filed a joint application for renewal and amendment of their code-share authority and other related exemption authority, Docket OST-1996-1700.

By Order 2000-7-8, issued on July 7, 2000, the Department directed American Airlines and the TACA Group to submit additional information that we found to be relevant to our evaluation of these two applications. On February 28, 2001, American Airlines and the TACA Group individually and jointly submitted material in response to our order.

Based on our review of this material, we find that the Joint Applicants' response to Item 3 of our evidentiary request is not responsive. Therefore, in order to clarify our request, consistent with Order 2000-7-8, please provide the Department with all studies, analyses, reports, and information (on any media, formal or informal) that were produced since May 20, 1998, prepared for officers, directors, or individuals exercising similar functions by internal staff or third parties acting on its behalf, that evaluate or analyze the proposed relationship with respect to competition, competitors, potential for traffic growth or expansion into geographic markets, and the extent to which traffic and market forecasts/shares and revenue forecasts/shares for the proposed arrangement will be stimulated versus diverted from other U.S. airlines and indicate (if not contained in the document itself) the date of preparation, and the name and title of each individual who prepared such document.

An identical letter has been sent to counsel for the TACA Group. Additionally, a copy of this letter will be placed in Dockets OST-2000-7088 and OST-1996-1700.

Sincerely,

A handwritten signature in cursive script that reads "Randall D. Bennett".

Randall D. Bennett
Director, Office of Aviation Analysis

AMERICAN AIRLINES, INC.
LIST OF DOCUMENTS RESPONSIVE TO REVISED ITEM 3
APRIL 11, 2001

<u>Doc Number</u>	<u>Date</u>	<u>Preparer and Title</u>
1213-1223	Undated	Tim Skipworth, Attorney, Legal Department
1225-1226	Undated	Melanie Miranda, Senior Analyst, Int'l Planning
1235-1236	Undated	Ronald Brensinger, Manager, Capacity Planning
1241-1252	Undated	Walter Aue, Vice President, Capacity Planning
1253-1312	Undated	John Hutchinson, Managing Director, Int'l Planning
1324-1331	Undated	Melanie Miranda, Senior Analyst, Int'l Planning
1362-1364	6/18/98	John Hutchinson, Managing Director, Int'l Planning
1365-1367	6/30/98	Michael Thomas, Manager, Airline Profitability Analysis
1368-1369	7/7/98	John Hutchinson, Managing Director, Int'l Planning
1388-1390	7/16/98	Michael Thomas, Manager, Airline Profitability Analysis
1458-1464	8/10/98	Kurt Stache, Manager, Airline Profitability Analysis
1465-1476	8/10/98	Arnold Grossman, Vice Presi- dent, International
1500-1518	11/9/98	Jeffrey Campbell, Vice Presi- dent, Corporate Development
1522-1527	1/8/99	Renee Foisy, Manager, Int'l Planning

1528-1530	3/10/99	Melanie Miranda, Senior Analyst, Int'l Planning
1531-1535	3/24/99	Ronald Brensinger, Manager Capacity Planning
1536-1546	3/24/99	Renee Foisy, Manager, Int'l Planning
1547-1550	3/25/99	Ronald Brensinger, Manager, Capacity Planning
1552-1556	3/26/99	Ronald Brensinger, Manager, Capacity Planning
1642-1661	12/20/99	Arnold Grossman, Vice President, International
1671-1678	1/24/00	Tom Dolan, Principal, Corporate Development
1807-1820	4/28/00	Tom Dolan, Principal, Corporate Development
1989-2005	7/18/00	Arnold Grossman, Vice President, International
2041-2051	10/13/00	Melanie Miranda, Senior Analyst, Int'l Planning
2124-2138	1/3/01	Melanie Miranda, Senior Analyst, Int'l Planning
2146-2168	1/17/01	Beverly Goulet, Managing Director, Corporate Development
2171-2177	1/29/01	Melanie Miranda, Senior Analyst, Int'l Planning
2216-2229	2/9/01	Beverly Goulet, Managing Director, Corporate Development

2231-2249	10/28/99	Walter Aue, Vice President, Capacity Planning
2250-2267	2/21/00	Walter Aue, Vice President, Capacity Planning

NOTE: All but the last two documents were submitted on February 28, 2001. The last two were submitted on April 11, 2001.

CERTIFICATE OF SERVICE

I hereby certify that I have this day served the foregoing document by first-class mail on all persons named on the attached service list.


CARL B. NELSON, JR.

April 11, 2001

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