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DEPT. OF TRANSPORTATION
DOCKET SECTION

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

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Joint Application of)	
)	
UNITED AIR LINES, INC.)	Docket OST 96-1 116 - 14
)	
and)	
)	
DEUTSCHE LUFTHANSA, A.G.)	
(LUFTHANSAGERMANAIRLINES))	
)	
under 49 U.S.C. 41308 and 41309 for)	
approval of and antitrust immunity for)	
an expanded alliance agreement)	
_____)	

**ANSWER OF THE CITY AND COUNTY OF DENVER
IN SUPPORT OF THE JOINT APPLICATION
OF UNITED AIR LINES, INC. AND
DEUTSCHE LUFTHANSA. A.G.**

Communications with respect to this document should be sent to:

James C. DeLong
Director of Aviation
Denver International Airport
Airport Office Building
Ninth Floor
8500 Pena Boulevard
Denver, CO 80249
(303) 342-2000

Stephan M. Minikes
Richard J. Leidl
Reid & Priest LLP
701 Pennsylvania Avenue, N. W.
Suite 800
Washington, D.C. 20004
(202) 508-4000

Counsel for the City and
County of Denver

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

Joint Application of)

UNITED AIR LINES, INC.)

and)

DEUTSCHE LUFTHANSA, A.G.)
(LUFTHANSA GERMAN AIRLINES))

under 49 U.S.C. 41308 and 41309 for)
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Docket OST 96-1 116

ANSWER OF THE CITY AND COUNTY OF DENVER
IN SUPPORT OF THE JOINT APPLICATION
OF UNITED AIR LINES, INC. AND
DEUTSCHE LUFTHANSA, A.G.

The City and County of Denver (“Denver”) hereby submits this Answer in Support of the Application of United Air Lines (“United”) and Deutsche Lufthansa, A.G. (“Lufthansa”) for approval of and antitrust immunity for the Alliance Expansion Agreement (“**UA/LH Alliance**”). In support of this Answer, Denver states as follows:

1. Denver International Airport (“DIA”) ranks seventh nationwide in terms of passengers and serves the State of Colorado and the entire Intermountain West region. Yet, except for once per week service to Amsterdam during the winter and summer seasons, DIA has no non-stop scheduled service to Europe. One of Denver’s key goals is to increase its European service. The **UA/LH Alliance** is an important step towards that goal.

2. United has a major hub at DIA, with about 280 flights per day. Denver's existing service to Frankfurt is primarily through connecting flights in Chicago or Washington, D.C. The United/Lufthansa code sharing arrangement has given Denver more convenient access to other points in Europe through Lufthansa's strong Frankfurt hub.

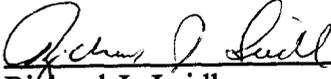
3. The **UA/LH** Alliance will enable the two carriers to build on and expand the benefits to Denver under the existing arrangement by allowing the carriers to coordinate schedules and routes more efficiently and effectively, thereby saving time and money and providing more options to the travelling public. This should immediately provide Denver better connecting service to points in Europe. Ultimately, the Alliance should provide Denver its long sought after non-stop service to Germany by fully utilizing the strong feed traffic from United's Denver hub and Lufthansa's Frankfurt hub. These benefits are clearly in the public interest.

4. The Department should also consider the strong public interest in ensuring that the open skies agreement with Germany moves forward and is fully implemented as soon as possible. This agreement will expand access to the largest economy in the European Union and provide Denver and other underserved cities important opportunities to obtain new international service. The positive benefits of an open skies agreement with such a major trading partner are clear by simply looking at the negative impacts that the restrictive **U.S.-U.K.** bilateral agreement has in preventing Denver and other cities from getting access to London. The new bilateral agreement with Germany will also be a major step towards opening the skies to all points in Europe. Accordingly, Denver urges the Department to

ensure that the U.S. -German open skies agreement is fully implemented by approving the **UA/LH** Alliance.

Respectfully submitted,

James C. **DeLong**
Director of Aviation
Denver International Airport
Airport Office Building
Ninth Floor
8500 **Pena** Boulevard
Denver, CO 80249
(303) 342-2000



Richard J. Leidl
Stephan M. Minikes
Reid & Priest LLP
701 Pennsylvania Avenue, N.W.
Suite 800
Washington, D.C. 20004
(202) 508-4000

Dated: April 3, 1996

CERTIFICATE OF SERVICE

I certify that I have on this date served the foregoing Answer on **all** persons named in the attached service list by causing a copy to be sent via first-class mail.

A handwritten signature in black ink, appearing to read 'P. Ruiz', written over a horizontal line.

Phillis Ruiz

April 3, 1996

SERVICE LIST

Roger W. Fones
Chief, Transportation, Energy
& Agriculture Section
Antitrust Division
U.S. Department of Justice
Room 9104, Judiciary Center Building
555 Fourth Street, N.W.
Washington, D.C. 20001

Carl B. Nelson, Jr.
Associate General Counsel
American **Airlines**, Inc.
1101 17th Street, N.W., Suite **600**
Washington, D.C.: 20036

Nathaniel P. Breed, Jr.
Shaw, Pittman, Potts &
Trowbridge
2300 N Street, N.W.
Washington, D.C. 20037

Richard D. **Mathias**
Frank Costello
Cathleen P. Peterson
Zuckert, **Scoutt & Rasenberger**
888 17th Street, N.W., Suite 600
Washington, D.C. 20006

Stephen L. **Gelband**
Hewes, **Morella, Gelband**
& **Lamberton, P.C.**
1000 Potomac Street, N.W.
S u i t e 3 0 0
Washington, D.C. 20007

R. Bruce **Keiner**
Crowell & Moring
1001 Pennsylvania Avenue, N.W.
10th Floor North
Washington, **D.C. 20004**

R. D. **Devlin**
Richard J. **Fahy**, Jr.
Trans World Airlines
808 17th Street, N.W., Suite 520
Washington, D.C. 20006

Elliott M. **Seiden**
Megan Rae **Poldy**
Northwest **Airlines**
901 **15th Street**, N.W., Suite 500
Washington, D.C. 20005

James R Weiss
Preston, Gates, Ellis & Rouvelas
1735 New York Avenue, N.W., Suite 500
Washington, D.C. 20590

Robert E. Cohn
Shaw, Pittman Potts & Trowbridge
2300 N **Street**, N.W.
Washington, D.C. 20037

D. Scott Yohe
Vice President-Government Affairs
Delta Air Lines, Inc.
1629 **K** Street, N.W.
Suite 501
Washington, D.C. 20006

David L. Vaughan
Kelley, Drye & Warm
1200 19th Street, N.W.
Suite 500
Washington, D.C. 20036

U.S. Transcom/TCJ5
Attention: Air Mobility Analysis
508 Scott Drive
Scott **AFB**, IL 62225

Michael F. Goldman, Esq.
Bagileo, Silverberg & Goldman
1101 **30th** Street, N.W.
suite 120
Washington, D.C. 20007

Frank Cotter
Assistant General Counsel
USAir, Inc.
2345 Crystal Drive, 8th Floor
Arlington, VA 22227

Vance Fort
World **Airways, Inc.**
13873 Park **Center** Road, Suite **490**
Herndon, VA 22071

Richard P. Taylor
Steptoe & Johnson
1330 **Connecticut Avenue, N.W.**
Washington, D.C. 20036