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BEFORE THE
DEPARTMENT OF TRANSPORTATION
WASHINGTON, D.C.

DEPT. OF TRANSPORTATION
DOCKETS

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Joint Application of)
)
 AMERICAN AIRLINES, INC.)
)
 and)
)
 BRITISH AIRWAYS PLC)
)
 under 49 U.S.C. §§ 41308-41309 for approval of)
 and antitrust immunity for agreement)
)

Docket OST-2001-10387 - 38

Joint Application of)
)
 AMERICAN AIRLINES, INC.)
)
 and)
)
 BRITISH AIRWAYS PLC)
)
 under 14 C.F.R. Part 212 for statements of)
 authorization (blanket codesharing) and)
 under 49 U.S.C. § 40109 for related exemption)
 authority)
)

Docket OST-2001-10388 - 28

MOTION OF NORTHWEST AIRLINES, INC.,
FOR EXTENSION OF PROCEDURAL DATES

Communications with respect to this document should be addressed to:

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Dated: September 5, 2001

**BEFORE THE
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WASHINGTON, D.C.**

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Docket OST-2001-10388

Date: September 5, 2001

**MOTION OF NORTHWEST AIRLINES, INC.,
FOR EXTENSION OF PROCEDURAL DATES**

Northwest Airlines, Inc., ("Northwest") hereby moves the Department for an extension of the procedural dates established by the Department's Scheduling Notice of August 27, 2001. Specifically, Northwest requests that the Department amend its Scheduling Notice to provide that answers to the American Airlines/British Airways applications shall be due not less than 120 days from the date of that Notice. Although Northwest supports the relief requested by

Continental Airlines in its Motion to Dismiss dated August 30, 2001, if the Department is unwilling to grant either form of relief requested in that Motion, then the Department should at a minimum grant the relief requested herein.

In addition, with respect to the approximately 20,000 pages of documents for which the applicants have requested confidential treatment, Northwest asks the Department (a) to direct American and British Airways to make copies of available at multiple locations in Washington and (b) to allow interested parties to make photocopies of those documents at their cost, subject to signing such additional affidavits as may be necessary to provide assurances that the confidentiality of the documents will be protected.

Finally, in light of the urgency of the relief requested herein, Northwest asks the Department to process this motion on an expedited basis and require that answers to this motion be due no later than September 10, 2001.

1. INTRODUCTION

The Department's Scheduling Notice fails to account for the extraordinary nature of this case. The proposed American/British Airways alliance is the largest and most significant alliance that the Department has ever been asked to scrutinize. The Department characterized the first American/BA proceeding as "an exceptional case, posing a unique set of issues. The proposed American Airlines-British Airways alliance entails an enormous degree of regulatory complexity." Order 97-9-4 at 16. This case is no less exceptional or complex. American and British Airways would combine their massive resources and activities in the single largest U.S.-foreign country market and the single largest U.S.-foreign point market and in multiple city-pair markets that they would dominate. Existing barriers to entry, including constraints on access to slots and facilities at Heathrow Airport, would prevent any meaningful competitive response.

The resulting anti-competitive effects and harm to consumers in numerous markets would be substantial. The Department's decision on the proposed alliance is of critical importance to U.S. carriers and communities and will have profound implications for the entire aviation community.

Consistent with the scope of this case, American Airlines and British Airways submitted approximately 20,000 pages of “confidential” materials with their applications. American and British Airways had months, and perhaps years, to develop these materials before presenting them to the Department.

Under principles of due process, the parties are entitled to a meaningful opportunity to review and analyze all of that material. As is discussed in below, the parties are also entitled to a meaningful opportunity to prepare their own evidence in order to meet the arguments and claims contained in the American/British Airways applications and to prepare and submit answers to the applications.

Under the circumstances, including the volume of “confidential” materials submitted by the applicants and the severe constraints on the parties’ access to the materials, the 21-day answer period established by the Department’s Scheduling Notice prevents the parties from taking these fundamental actions and plainly violates the parties’ rights of due process. Northwest submits that the 120-day answer period requested herein is the minimum period needed to allow all interested parties to take the fundamental actions needed in order to respond meaningfully to the American/British Airways applications

2. THE DEPARTMENT'S SCHEDULING NOTICE AND PROCEDURES VIOLATE THE DUE PROCESS RIGHTS OF INTERESTED PARTIES AND ARE CONTRARY TO THE PUBLIC INTEREST.

A. The Parties Must Be Afforded a Fair and Meaningful Opportunity to Review the Record and Answer the Applications.

The Administrative Procedure Act commands that agency actions not be arbitrary, capricious, or an abuse of discretion, or contrary to constitutional right. 5 U.S.C. § 706(2)(A-B). According to the seminal due process case, "[t]he fundamental requirement of due process is the opportunity to be heard 'at a meaningful time and in a meaningful manner.'" Mathews v. Eldridge, 424 U.S. 319, 333 (1976) (quoting Armstrong v. Manzo, 380 U.S. 545, 552 (1965))(emphasis added). The Department's Scheduling Notice expressly recognizes the fundamental need "to provide all interested parties sufficient time to analyze adequately and comment fully on all material in the public and non-public record" (emphasis added).

The Department's action is arbitrary, capricious and an abuse of the Department's discretion. As explained below, the 21-day answer period established by the Department will deny interested parties a fair and meaningful opportunity to be heard. The parties will not have sufficient time to review and analyze adequately the public and non-public materials and to comment fully or meaningfully on the American/BA applications.¹ As a result, the Department will decide this case on the basis of an incomplete record.

This denial of due process will provide parties with a solid basis for appellate review of any Department order in this case and for a stay of any Department action pending such review. In order to avoid this denial of due process, if the Department denies the relief requested by

¹ It should be noted that the 21-day answer period established by the Department represents only 17 business days and encompasses the Labor Day holiday and Rosh Hashanah.

Continental, the Department must at a minimum establish a new answer period that is not less than 120 days from the date of the Scheduling Notice.

B. The 21-Day Answer Period Does Not Afford A Meaningful Opportunity to be Heard.

As stated above, American and British Airways submitted hundreds of pages of public exhibits with their application and approximately 20,000 (19,507, to be precise) pages of materials for which they have requested confidential treatment. Under the best of circumstances, it is unlikely that the parties could review those materials and prepare answers incorporating those materials within the 21-day answer period ordered by the Department.

Constraints on access to the materials, however, exacerbate the problem. Pursuant to the Department's August 16 Notice on Document Access, interested parties may only review those documents at the Department's Docket Section.² Such review is limited to the Department's regular hours of 9:00 a.m.-5:00 p.m. Parties may not review the materials outside of those hours, on weekends, or when the building is closed for any other reason, such as during the Labor Day holiday.

This severe access problem has been compounded by the limited facilities at the Department's Docket Section and by other access limitations, as is discussed in the attached Affidavit. Department staff initially required parties to review the documents only in a single small cubicle in the Dockets Section office and refused to allow the documents to be reviewed at other locations in the Docket Section.³ Because of the size of the cubicle, only two people at a

² Copies of the documents have not been made available for review at the offices of applicants' Washington representatives, as has been the practice in other cases, including the first American/BA case.

³ Affidavit of Elliott M. Seiden ¶ 10.

time could realistically review and take notes on the documents.⁴ Department staff have subsequently allowed parties to review documents at other locations at DOT, such as the empty cubicle of an absent DOT employee, but such accommodations are arbitrary and unpredictable.⁵ In addition, Department staff initially refused to allow representatives of more than one party to review the materials at any one time.⁶

Furthermore, parties are not permitted to make copies of the documents. Dockets Section staff, senior members of the Department's Office of the General Counsel and American's regulatory counsel have consistently refused to allow Northwest's representatives to copy any documents.⁷ The parties must instead write down selected contents of documents by hand or on a laptop computer. This process is time-consuming and laborious, carries with it the potential for errors in transcription and compounds the already-severe access problem discussed above.

Considering the physical limitations, the time limitations, the volume of materials (almost 20,000 pages), the inability to make copies of the materials and the number of parties who are entitled to access to the materials, it will be a physical impossibility for all of the parties, within the 21-day answer period established by the Department, to undertake and complete all of the steps that due process principles entitle them to take. The parties are entitled to, without limitation, (a) review and take notes on the materials, (b) assess the completeness of the document production and determine what documents the joint applicants have failed to produce, (c) prepare such summaries of the materials as are necessary for counsel and experts to analyze

⁴ Id.

⁵ Id. ¶ 15.

⁶ Id. ¶¶ 9.

⁷ Id. ¶¶ 3-8, 16.

them, (d) demand and obtain production of documents that the joint applicants have failed to produce, (e) research and obtain other evidence, (f) develop responsive exhibits and materials and (g) draft and incorporate such responsive materials into the answers to the applications. In fact, given the sheer volume of materials, Northwest believes it is unlikely that as single party could accomplish all of this within the 21-day period, much less all of the parties who are entitled to a fair and meaningful opportunity to do so.

As suggested by the above list, an adequate review of the approximately 20,000 pages of American/BA materials is far from the only task that the parties must complete in order to respond meaningfully to the applications and create a full record. The parties must also perform economic studies of the data in the materials and research and develop their own information. Some information may take a substantial amount of time to obtain. As a single example, given the critical nature of Heathrow slots and facilities and the various claims made by American and BA about the ready availability of Heathrow slots and facilities, Northwest must respond to those claims. This requires obtaining data and information from various sources, including Airport Coordination Limited, which is responsible for slot coordination at Heathrow. Northwest has formally requested certain information from ACL, but given ACL's other responsibilities there is no assurance that ACL can or will respond to Northwest's request in time to allow Northwest to review and analyze the data and information and then prepare exhibits to submit to the Department within the 21-day answer period.

C. Precedent Does Not Support the 21-Day Answer Period

As discussed above, this is an extraordinary case, similar only to the first American/British Airways immunity proceeding in scope and complexity. The schedule

established by the Department in this case, however, affords the parties much less opportunity to respond than was afforded in the first American/BA immunity case. In that case, the application for antitrust immunity was filed on January 10, 1997. The Department issued its Notice on Access to Confidential Documents on April 3, 1997. Answers were due on May 22, 1998. Thus, in the first American/BA case, interested parties were given over 16 months from the date the application was filed and over 13 months from the date confidential documents were made available for review to prepare and file answers to the application. Under the Scheduling Notice in this case, however, answers must be filed only 40 days after the applications were filed and only 35 days after the Department granted access to the approximately 20,000 pages of “confidential” materials.

It is true that in some immunity cases the Department has ordered a 21-day answer period. Those cases do not set a relevant precedent for this case. It bears repeating: this is the most significant antitrust immunity application that the Department has ever been asked to consider. What may have been an appropriate answer period in other cases is wholly inappropriate in this case. None of those cases involved markets of the magnitude of the markets implicated in this case. None of those cases involved the number and complexity of issues that are raised by the American/BA applications. None of those cases required review of almost 20,000 pages of materials submitted by the applicants. Finally, as discussed earlier, none of those proceedings was conducted in the complete absence of an open skies agreement that had at least been initialed by the United States and the other country.

3. THE DEPARTMENT MUST TAKE IMMEDIATE STEPS TO CORRECT THE SITUATION

Under the circumstances, the Department's Scheduling Notice constitutes a gross violation of the due process rights of interested parties and is plainly contrary to the public interest. The Department must take immediate steps to correct this situation.

First, if the Department denies the August 30, 2001 motion of Continent Airlines to dismiss or, in the alternative, for an indefinite suspension of procedures until after the United States and the United Kingdom have signed an open skies agreement providing for de facto open skies, the Department should at a minimum give interested parties not less than 120 days from the date of the Scheduling Notice to file answers to the American/British Airways applications. As stated above, Northwest submits that the 120-day answer period requested herein is the minimum period needed to allow all interested parties to take the fundamental actions needed in order to respond meaningfully to the American/British Airways applications.

Second, irrespective of the disposition of the Continental motion, the Department should direct American and British Airways to make full sets of the "confidential" document available for review by the parties at at least two additional locations in Washington.

Third, irrespective of the disposition of the Continental motion, the Department should order that the parties be allowed to make photocopies of the "confidential" documents, subject (if necessary) to the execution of such additional affidavits as the Department may feel are necessary to protect the confidentiality of the documents.

Fourth, Northwest urges the Department to act on this motion expeditiously and requests that answers be due no later than September 10, 2001.

WHEREFORE, Northwest Airlines urges the Department to grant the relief requested
above.

Respectfully submitted,



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BEFORE THE
DEPARTMENT OF TRANSPORTATION
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Joint Application of :
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 under 49 USC 40109 for related exemption :
 authority :

AFFIDAVIT

Washington)
) ss:
 District of Columbia)

Elliott M. Seiden, being duly sworn, states:

1. My name is Elliott M. Seiden. I am Vice President and Managing Director of GCW Consulting, which has been retained by Northwest Airlines, Inc. to provide consulting services in connection with to the applications of American Airlines, Inc. and British Airways PLC for antitrust immunity and code sharing authority in the captioned proceedings.
2. On Thursday, August 30, 2001, at approximately 10:45 AM, I arrived at the Docket Section of the U.S. Department of Transportation located at 400 Seventh Street,

S.W., Room PL-401, Washington, D.C. to examine confidential documents in this case. I had been at that same location the previous day for approximately five hours reviewing the confidential materials and taking notes in accordance with the stated procedures of the Department. I had not been permitted to make any copies of any of the materials.

3. I advised the supervisors in the Docket Section that with some 20,000 pages to examine, and based on my previous day's experience with the laboriously slow process of gathering information contained in the confidential documents by manual note-taking, I and my colleagues would not be able to complete the necessary review in time to assist Northwest in preparing Exhibits and filing Comments with the Department by the September 20, 2001 due date. I stated that the process could be expedited if I were permitted to photocopy particular pages from the confidential documents that I judged to be material and relevant to the issues in the proceeding, and I requested permission to do so.

4. The docket clerks on duty, Angelia Ames and Louise Jones, told me that I could not photocopy any of the documents because this was not permitted by the DOT's rules and procedures governing access to confidential documents. I explained that I was asking for an exemption from the DOT's usual procedure given the highly expedited nature of the case, and I requested an opportunity to speak to a supervisor. Ms. Ames put me in touch by telephone with Mr. Horn and Mr. Brooks in DOT's Office of the General Counsel.

5. When Mr. Horn and Mr. Brooks came on the phone, at approximately 10:50 a.m., I explained the dilemma Northwest confronted and requested permission to make copies of particular pages of the confidential documents as needed. I advised them that given the September 20, 2001 deadline for filing comments, I would be unable to (a) complete a full and thorough review of the documents in a timely fashion, perhaps not even before the due date for Comments; (b) organize and analyze the documents for integration into Exhibits and Comments to be submitted by Northwest to the Department on September 20, 2001; and (c) submit particular confidential pages to the Department in support of Northwest's arguments, in conformity with DOT's rules on confidential submissions. I reiterated my request for permission to photocopy some of the confidential documents as needed. I advised Mr. Horn and Mr. Brooks that I was prepared to submit an additional affidavit agreeing to abide by whatever additional security measures the Department might deem to be appropriate, including keeping the documents under lock and key.

6. Mr. Horn advised me that photocopying confidential documents was not permitted. He urged me instead to contact counsel for the Joint Applicants to request that the joint applicants make a set of the confidential documents available for review and copying at their offices. I thanked Mr. Horn for his suggestion and indicated I would call Mr. Carl Nelson, counsel for American Airlines and make such a request.

7. At approximately 11:00 a.m., I telephoned Mr. Nelson and requested that copies of the confidential documents be made available for review at American Airlines' Government Affairs Office and that permission to photocopy the documents be granted.

Mr. Nelson stated that he did not have a set of the confidential documents in his office. He indicated that to comply with the request for review, he would have to have another set shipped up from headquarters, but that under no circumstances would I be permitted to photocopy the documents. I explained that photocopying them was essential to Northwest having any chance of completing a review of the documents in a timely fashion, but he did not change his position.

8. Upon ending my telephone conversation with Mr. Nelson, I again telephoned Mr. Horn and told him that Mr. Nelson had denied my request to examine and photocopy the documents at American's offices. I reiterated my request to Mr. Horn for permission to photocopy the documents located in the DOT's docket section. Mr. Horn, in consultation with Mr. Brooks, told me that he would continue to consider my request, and would get back to me if there were further developments.

9. Meanwhile, Mr. Tom Bolling, counsel for Continental Airlines, had arrived at the DOT Docket Section at the time that I was talking to Mr. Horn. Mr. Bolling requested access to the confidential documents, but was denied access by the docket clerks who told him that only one party at a time could have access to the documents on a first-come, first-served basis. Mr. Bolling was told that he would have to wait for access to the documents until I was done reviewing them. When it became clear to Mr. Bolling that I planned to review the documents for an extended period of time, Mr. Bolling was told by one of the Docket Clerks that he should return to his office rather than wait, and that she would telephone him when I had completed my review and it became Mr. Bolling's turn to review the documents. Mr. Bolling left the Docket Section rather than wait for an unknown period of time for access to the documents.

10. At approximately 10:45 AM, Mr. Robert DeHaan, counsel for Northwest Airlines, and Mr. Ken Hines, a legal assistant for counsel to Northwest Airlines joined me at the Docket Section to assist in the document search. We were initially told by the docket clerks that only one person could examine the documents at a time. However, when Mr. DeHaan and Mr. Hines explained that they represented the same party that I represented, they were permitted to join me in a four-foot by six-foot cubicle made available by DOT for parties to review the American Airlines/British Airways confidential documents. Since the cubicle only had minimal desk space for a maximum of two people, Mr. Hines was forced to write on his lap. When Mr. Hines requested that he be allowed to take some of the documents to one of the tables in the public space of the DOT Docket Section, this request was denied. Mr. Hines was told that the confidential documents had to be shielded from public view. Mr. Hines was required to remain in the crowded cubicle, where he had to write without table or desk space.

11. Mr. DeHaan, Mr. Hines and I reviewed the documents for the rest of the day, taking notes by hand and by computer keyboard. We continued this process, without break, until the Docket Section closed its offices at 5:00PM, whereupon we were requested to leave.

12. Mr. Bolling, Counsel for Continental, was unable to secure access to the documents for the entire day in light of the continuous examination of the documents by me and my colleagues in behalf of Northwest.

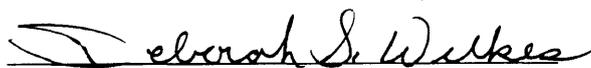
13. Upon leaving the Docket Section, I was advised that the Docket Section would open the next day at 9:00AM and that access would be made available to the confidential documents on a first come first served basis, such that if another party got there before me and my colleagues, representatives of Northwest would be unable to secure access to the documents until that party ceased its examination.

14. Mr. DeHaan and I returned to the Docket Section the next day, Friday, August 31, 2001 at approximately 11:45 AM to resume our examination of the confidential documents. We observed that Mr. Tom Bolling, Counsel for Continental, had previously secured access to the confidential document and was examining them. In addition, another representative for Continental, Mr. Morris R. Garfinkle, also had requested and obtained access to the confidential documents.

15. Because Mr. DeHaan and I represented a different party from the party that already had secured access to the documents, we were not allowed to examine the documents in the small cubicle that had been set aside for that purpose, and which was in use at the time by representatives of Continental. I requested that alternative arrangements be made to accommodate Northwest's request for document access, notwithstanding that another party already had secured access to the confidential documents. The Docket Clerks asked me to wait while they considered my request. After a wait of perhaps fifteen minutes, Mr. DeHaan and I were escorted to another area in the DOT building, a large room with many cubicles in active use by DOT employees. We were allocated two cubicles, including the cubicle of a DOT employee who was absent that day, and allowed to examine the documents there until the Docket Section closed at 5:00 PM.

16. As of the date of the signing of this affidavit, neither Mr. Brooks nor Mr. Horn has contacted me to discuss further my request to photocopy the confidential documents.

Subscribed and sworn to before me this 5th day of September, 2001



Notary Public

My Commission Expires:

DEBORAH S. WILKES
Notary Public, District of Columbia
My Commission Expires April 14, 2005

CERTIFICATE OF SERVICE

I hereby certify that on this 5th day of September, 2001, I caused a copy of the foregoing Motion to be served by hand or by first class mail, postage prepaid, upon the following persons:

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