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Comments of US Airways  
(Docket FAA-04-16944)

BEFORE THE  
U.S. DEPARTMENT OF TRANSPORTATION AND  
FEDERAL AVIATION ADMINISTRATION  
WASHINGTON, D.C.

DEPT. OF TRANSPORTATION  
DOCKETS

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Operating Limitations at Chicago O'Hare  
International Airport

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Docket FAA-2004-16944-38

**COMMENTS OF US AIRWAYS, INC.**

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Airways submits these comments to assist in the development of the record that will determine how to best reduce delays at ORD.<sup>1</sup>

**II. THE CHALLENGES AT ORD ARE LARGE, AND A SUSTAINABLE SOLUTION REQUIRES A COMBINATION OF SHORT-TERM AND LONG-TERM INITIATIVES.**

At the outset, US Airways recognizes the efforts of DOT and FAA staff, led by Secretary Mineta and Administrator Blakey, to improve operations at one of the nation's most challenging and important airports. In an industry struggling to solve daunting financial challenges, their leadership in addressing operational reliability at ORD should be appreciated by all industry stakeholders.<sup>2</sup>

The challenge is great. There is no question that airlines need to work with the DOT and FAA in solving this immediate challenge at ORD. Airlines, however, face a conundrum. On the one hand, as Administrator Blakey stated during the public meeting: "Aviation is back." On the other hand, the return of passengers to pre-9/11 levels means that increased consumer flying is fueling the demand for more flights, both through ORD and to/from ORD. US Airways does not believe this demand is a temporary summer spike, but forecasts demand continuing to increase throughout the system as traditional carriers lower their cost structures and fares to compete more effectively with new entrants and low-cost carriers. For its part, US Airways is currently transforming from a high-cost carrier to a lower-cost carrier with, among other initiatives,

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<sup>1</sup> US Airways reserves the right to submit additional and confidential information to the FAA consistent with the procedures outlined in the Notice.

<sup>2</sup> US Airways also notes the actions taken by American Airlines and United Airlines earlier this year in unilaterally reducing flights in an effort to alleviate then-existing schedule and delay problems at ORD.

expanded offerings of GoFares (low-fares, few restrictions) to more and more destinations throughout US Airways' network.<sup>3</sup>

We highlight US Airways' transformation not simply to remind the FAA and DOT of US Airways' current plans, but to point out that traffic stimulation will continue with corresponding increases in scheduled flights and ultimately airport/airspace congestion as the U.S. airline industry moves from a high-cost platform to a low-cost platform. Thus, while certain short-term measures to alleviate delays at ORD may be necessary, such measures must be linked with long-term efforts to enhance capacity for users, including incumbents. Administrator Blakey pointed out an example of this, noting the aggressive efforts of the FAA to complete the environmental impact statement for the ORD modernization plan by Fall 2005. US Airways believes this is the only way out of the conundrum for airlines. Regulators face a similar challenge by evaluating and perhaps implementing administrative actions at odds with the very foundation of a deregulated industry, yet it is this deregulated regime that has spurred demand for air travel and created the current situation. At the end-of-the-day, we must all agree that any solution -- be it long-term or short-term -- should not appreciably diminish airline planners' primary function of placing the right aircraft, in the right market, at the right time.

### **III. US AIRWAYS IS A SMALL CARRIER AT ORD OPERATING BELOW PRE-9/11 LEVELS.**

US Airways is one of the smallest network carriers operating at ORD. During August 2004, US Airways operates only 19 daily arrivals. Of those 19 arrivals, US Airways has two flights that arrive outside the hours of 0700-2059. Thus, the potentially affected number of US

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<sup>3</sup> GoFares currently are offered to/from Chicago on nonstop flights to Philadelphia, and to/from numerous connecting markets in the Northeast, Mid-Atlantic and Florida.

Airways' arrivals is 17. These 17 arrivals represent a reduction of two flights from the schedule that US Airways operated during a similar period, and at similar times, in 2001. Moreover, US Airways has more than one arrival in any 15-minute period only once between 0700-2059. Relatively speaking, US Airways' overall impact on delays at ORD is *de minimis*.

**IV. ANY SOLUTION AT ORD SHOULD BE SUFFICIENTLY FLEXIBLE TO ACCOMMODATE THE OPERATIONS OF INDIVIDUAL CARRIERS.**

US Airways is hopeful its small presence at ORD will minimize or eliminate any need for it to make any schedule reductions. Should the FAA require carriers to change their schedules at ORD in any fashion, we offer some ideas for consideration that may alleviate some of the impact on carriers.

A successful solution to the current scheduling challenge at ORD starts with a baseline agreement between the carriers and the government. From media reports and other statements, it is not clear that such agreement has been reached on the number of arrivals that ORD can handle per hour. The difference between the industry and the FAA is a small number of flights. However, if a higher capacity number of 92 arrivals is utilized, instead of the government's arrival projection of 86 flights per hour, the incidence of 15-minute increments where arrivals are over-scheduled at ORD drops by approximately one-third. Obviously, in the most congested time periods, the increase in possible operations has little impact, but the overall scope of the problem would nonetheless be reduced, making it easier for the government and industry to solve jointly.

While US Airways remains hopeful that narrowly-tailored solutions solve the current problems at ORD, we recognize this may not be the case. If carriers must implement government-imposed or negotiated schedule changes, we respectfully request that the FAA not

apply a single implementation date for all carriers. For example, we understand that the FAA intends to press for any schedule changes to start on November 1, 2004, even though some carriers like US Airways do not start their winter schedules until November 7, 2004. Were US Airways required to implement changes before then, it would impose significant cost and hardship on US Airways and its passengers. Moreover, US Airways' schedules are closed for the period through November 6, 2004. Likewise, carriers need to finalize their November schedules, and the window for doing so is fast closing. For example, US Airways' November 7<sup>th</sup> schedules will close before the end of August.<sup>4</sup> Changes to the flight schedule, other than minor time slides, after that point would require "re-opening" the schedule, thereby adding considerable costs to US Airways, upheaval in crew/aircraft scheduling, and inconvenience to passengers who have advance purchase tickets. Thus, US Airways urges the FAA to work with individual carriers as to the optimal date for that carrier to implement any schedule changes.

Finally, with the exception of American and United, the remaining carriers at ORD operate from a small number of gates, thereby limiting their schedule flexibility. For example, US Airways operates from two gates at ORD. Schedules are timed and coordinated to ensure a steady flow of aircraft into and out of the ORD gates throughout the day, with almost no clustering of operations. In fact, US Airways cannot cluster flights at ORD because it does not have the gate facilities to do so. Accordingly, US Airways requests that the FAA be mindful of gate utilization issues as part of its analysis.

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<sup>4</sup> Even though US Airways' winter schedules generally run from November through April, the schedules change almost monthly as flight times are tweaked to account for changing weather patterns, new services and equipment substitution. Thus, any schedule changes should permit minor deviations to allow integration of ORD services into a carrier's overall schedule regime.

**V. FLIGHT OPERATIONS AT CHICAGO'S MIDWAY AIRPORT SHOULD BE EXAMINED IN ANY EFFORT TO REDUCE DELAYS AT ORD.**

Aside from any specific changes that US Airways must make to its schedule, US Airways' largest concern with this initiative and, indeed, with any demand management effort is that the scope of the problem be adequately measured. Earlier, we raised the issue of seeking industry and government agreement on the operations level at ORD. Issues broader than any single airport also need consideration as part of any solution. Temporary schedule reductions at ORD might address a certain problem at certain times of the day; however, long-term success at demand management in the Chicago-region or elsewhere involves systemic approaches. In this case, US Airways asks that the FAA include Chicago's Midway Airport (MDW) as part of the analysis. MDW has seen significant growth since 2001, now with almost 750 daily commercial airline operations. It is therefore very important to evaluate and recognize the impact that MDW operations have on the overall air space constraints in the Chicago region, and, to the extent that there is any indication that operations at MDW have a deleterious impact on ORD's operational performance, any ORD solution should encompass flights and carriers at MDW.<sup>5</sup> Furthermore, not including MDW in a regional solution only encourages growth at Midway, and, ultimately, replicates the current O'Hare scheduling and delay problem.

**VI. CONCLUSION**

US Airways appreciates the difficult task confronting the FAA and DOT. Nevertheless, Chicago O'Hare always has been, and always will be, a complex and challenging environment for airlines to operate in. The airlines, however, have adapted in the past, and are able, on all but

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<sup>5</sup> US Airways asks that any carrier at ORD that faces a changed competitive environment because of a direct service addition at MDW be permitted to respond on at least a one-to-one basis during the pendency of any flight restrictions at ORD.

the most extreme days, to successfully utilize ORD. It is our hope that administrative action will not be necessary, but should the FAA feel it has no choice, we urge caution and consideration of not just ORD-specific issues, but of all the relevant factors.

Respectfully Submitted,

A handwritten signature in black ink, appearing to read "Elizabeth K. Lanier". The signature is fluid and cursive, with a horizontal line underlining the name.

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