



A STAR ALLIANCE MEMBER

September 23, 2004

Via Overnight Mail
Office of Airline Information/BTS
Department of Transportation, K-25
400 Seventh St., S.W.
Washington, DC 20590

BTS-2004-19380-2

2004 OCT 15 A 9:17

DEPT. OF TRANSPORTATION
DOCKETS

Attn: Mr. Donald W. Bright, Assistant Director

Re: Motion of United Air Lines, Inc. for an Extension of the Confidentiality
Period for Certain Information Airframe and Aircraft Engine Cost Data
Reported on Form 41 Schedules B-7 and B-43

Dear Mr. Bright:

In response to your Notice of Intent to Publicly Release Airframe and Aircraft Engine Cost Data Reported on Form 41 Schedules B-7 and B-43 dated August 26, 2004, enclosed is one original plus twelve copies of United Air Lines' Motion for an Extension of the Confidentiality Period for Certain Information Airframe and Aircraft Engine Cost Data Reported on Form 41 Schedules B-7 and B-43.

Sincerely,

David B. Olausen
Senior Counsel

Enclosures

AIRLINE STATISTICS

04 SEP 24 AM 11:08

RECEIVED

BEFORE THE
DEPARTMENT OF TRANSPORTATION
OFFICE OF THE SECRETARY
WASHINGTON, D.C.

RECEIVED
2004 SEP 23 11:11

Motion of

UNITED AIR LINES, INC.

for Confidential Treatment
under Section 302.39

Docket OST-95-675

MOTION OF UNITED AIR LINES, INC.
FOR AN EXTENSION OF
CONFIDENTIALITY PERIOD

Communications with respect to this document should be sent to:

DAVID B. OLAUSSEN
Senior Counsel
UNITED AIR LINES, INC.
P.O. Box 66100
Chicago, Illinois 60666
847/700-6169

DATED: September 23, 2004

BEFORE THE
DEPARTMENT OF TRANSPORTATION
OFFICE OF THE SECRETARY
WASHINGTON, D.C.

Motion of	:	
UNITED AIR LINES, INC.	:	Docket OST-95-675
For Confidential Treatment	:	
Under Section 302.39	:	

MOTION OF UNITED AIR LINES, INC.
FOR AN EXTENSION OF
CONFIDENTIALITY PERIOD

Pursuant to Rule 39(e) of the Department of Transportation, Office of the Secretary Procedural Rules, and in response to the Department's Notice of Intent to Publicly Release Airframe and Aircraft Engine Cost Data Reported on Form 41 Schedules B-7 and B-43 dated August 26, 2004, United Air Lines, Inc. ("United") hereby files this Motion for an Extension of the Confidentiality Period for Certain Information Airframe and Aircraft Engine Cost Data Reported on Form 41 Schedules B-7 and B-43.

United hereby requests the Department grant United an extension, *until December 31, 2006*, of the confidentiality period granted (or previously requested) with respect to certain airframe and aircraft engine cost data reported in (a) our annual Form 41 Schedules B-43 for the years 1992 through 1996, and (b) our quarterly Form 41 Schedules B-7 for the quarters ended December 31, 1992 through December 31, 1996.

The information for which this confidentiality extension is sought detail United's acquisition cost and sales realization amounts with respect to new and used aircraft and aircraft engines, each broken down by model, individual serial number, and individual purchase or sale prices for the period 1992-96. This information is substantially similar to and consistent with other aircraft/engine price information for which United continued to consistently seek confidentiality after 1996 up to the present. Most of the confidential price information relates to acquisitions made under Boeing and Airbus aircraft acquisition agreements whose delivery dates began in the early 1990's and extended up to the present. As a result, our 747s delivered in 1994, for example, have aircraft/engine prices which are the same as the prices of the later delivered 747s, except for some minor changes due to price escalation provisions and any minor

configuration changes. Therefore, the disclosure of the aircraft/engine price information for 1992-96 would result in the effective disclosure of the similar price information relating to the later filed years.

For the above reasons, disclosure of this sensitive price information would have a significant negative impact on United, despite the number of years that have passed since the original information was filed. United considers the requested information deleted from Schedules B-7 and B-43 to be highly sensitive and confidential, and to continue to be so for the information filed in 1992-96. Other airlines, including foreign airlines, should not be allowed to see United's favorable aircraft and engine price information. Such knowledge would only serve to arm other airlines, including foreign ones, with better information as to how far they could likely push Boeing or Airbus in negotiations, and also may well hurt what United might be able to negotiate from Boeing or Airbus in future aircraft deals.

United believes that both FOIA Exemption 3 and Exemption 4 continue to be applicable, and that application of the Exemptions is consistent with prior Department orders.

United requests here that the Department grant United an extension, *until December 31, 2006*, of the confidentiality period granted (or previously requested) with respect to our designated B-43 and B-7 airframe and aircraft engine cost data reported in (a) annual Form 41 Schedules B-43 for the years 1992 through 1996, and (b) quarterly Form 41 Schedules B-7 for the quarters ended December 31, 1992 through December 31, 1996. We have asked for the extension until December 31, 2006 because that is the current date that the Securities and Exchange Commission has granted United confidentiality for selected portions of our aircraft acquisition agreements – including specifically our aircraft price and price escalation provisions – which were filed with the SEC as material contracts. We believe it makes sense at this time to ask for the same date to protect this price information that the SEC has granted with respect to this information.

WHEREFORE, United requests that the Department, pursuant to Rule 39 of its Rules of Practice and Exemptions 3 and 4 of the Freedom of Information Act, to grant an extension of the confidentiality period, until December 31, 2006, with respect to the previously designated confidential airframe and aircraft engine cost data reported in (a) our annual Form 41 Schedules B-43 for the years 1992 through 1996, and (b) our quarterly Form 41 Schedules B-7 for the quarters ended December 31, 1992 through December 31, 1996.

Respectfully submitted,



David B. Olausen

Senior Counsel

UNITED AIR LINES, INC.

DATED: September 23, 2004