

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

Motion and Application of

AMERICAN AIRLINES, INC.

Motion of

HAWAIIAN AIRLINES, INC.

in the matter of 2010 U.S.–Haneda
Combination Services Allocation Proceeding

Docket DOT-OST-2010-0018

APPLICATION OF AMERICAN AIRLINES, INC.

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APPLICATION OF AMERICAN AIRLINES, INC.

On October 2, 2014, American Airlines, Inc. (“American”) filed a Motion before the Department seeking review of the usage of one U.S.-Haneda slot pair by Delta Air Lines, Inc. (“Delta”) on the Seattle-Tokyo (Haneda) route allocated by Order 2013-2-4. The Department agreed that a review was warranted and instituted this proceeding to determine “the disposition of the U.S.-Haneda slot pair currently allocated to Delta . . . for services between Seattle, Washington and Tokyo’s Haneda Airport.”¹ Because the U.S.-Japan bilateral limits U.S.-Haneda service by U.S. carriers to only four slot pairs, this proceeding is essential to protecting the public interest. As the Department stated: “The principal objective in this proceeding will be to maximize public benefits with this scarce resource.”² Maximizing public benefits means greater travel options, more choices for consumers, and increased competition among airlines and alliances.

¹ U.S.-Haneda Combination Services Allocation, Order 2014-12-9 slip op. at 1 (Dep’t of Transp. Dec. 15, 2014).

² *Id.* at 5.

American hereby submits this application for one slot pair to be used in the Los Angeles-Haneda market pursuant to 49 U.S.C. § 40109, 14 C.F.R. Part 302, subpart C of the Department's regulations, and Order 2014-12-9. Our service proposal provides:

- **Year-round daily service** in the largest U.S.-Tokyo market, Los Angeles-Haneda.
- Convenient **connections in both directions to 25 markets** at Los Angeles, American's West Coast gateway, in the Summer season and to 32 connections in both directions in the Winter season – more than any other Los Angeles-Haneda carrier.
- Boeing 777-200 equipment with **247 seats**: 16 First Class, 37 Business Class, and 194 Economy; planned 2015 configurations will increase seats to 260.³
- Significant addition of **cargo** capacity to this important Asian market.
- **Commencement within 60 days** of issuance of a Final Order by the Department.

To achieve the benefits described in this Application, the Department should reallocate to American the U.S.-Haneda slot pair currently used by Delta for Seattle-Haneda service to allow American to offer its proposed Los Angeles-Haneda service.

I. Adding Service to Haneda Is Critical to American's International Strategy

American's top international priority is building its Asian presence, which will allow it to compete more effectively in that region. As American's President, Scott Kirby, and Senior Vice President and Chief Marketing Officer, Andrew Nocella, testify in Exhibits AA-T-1 and AA-T-2, gaining access to Tokyo Haneda is a cornerstone of that strategy. By achieving Haneda service, American will be able to provide greater network

³ Ex. AA-T-1; also, Ex. AA-103. American is currently reconfiguring its B777-200s to have 260 seats, with 45 Business Class seats, 55 Main Cabin Extra seats, and 160 Economy seats.

coverage for the travelling public and shippers, and allow American to compete with the incumbent U.S. airlines serving Japan.

While the normal service start-up conditions requested by the Department is 90 days, American recognizes the value of this scarce resource and commits to start service 60 days after the issuance by the Department of a Final Order. American will make every effort to start earlier than its 60-day commitment, but, realistically and operationally, accelerating this already accelerated schedule may not be possible.

Increasing American's presence at Haneda is critical, and it is fully committed to serving that market. Moreover, as our exhibits demonstrate, American's proposal will:

- provide substantial inter-carrier competition to the two largest U.S. carriers serving Tokyo, and Japan, and all of Asia – Delta and United;⁴
- provide inter-alliance competition to SkyTeam and Star Alliance at Los Angeles;⁵
- provide real, meaningful inter-gateway competition;⁶ and
- provide real, meaningful intra-gateway competition.⁷

Historically, American has repeatedly tried to secure a more comprehensive network to Japan. Yet, American's efforts have been either practically or legally impeded by the incumbent carriers' opposition and strong market position, which is the product of their many decades headstart in Asia on American, which in turn, is the product of their privileged "incumbent" position. More recently, American's efforts to provide competition to the incumbents has faced another challenge: Delta's attempts at the government negotiation table to block further U.S.-Japan liberalization. As the

⁴ Ex. AA-207.

⁵ Ex. AA-208.

⁶ Ex. AA-207.

⁷ Exs. AA-207-208.

Department is quite aware, no U.S. carrier has been more vocal, active in, and supportive of U.S. Government attempts to further liberalize the U.S.-Japan aviation market than American.

II. American's Proposed Los Angeles-Haneda Service

American will provide year-round daily nonstop service between Haneda and Los Angeles. American's proposed schedule will be:

Summer 2015 Schedule

Route	Departure Time (local)	Arrival Time (local)
LAX to HND	18:30	22:30 +1
HND to LAX	00:00	18:30 -1

Winter 2015 Schedule

Route	Departure Time (local)	Arrival Time (local)
LAX to HND	17:00	22:30 +1
HND to LAX	00:00	17:00 -1

American's schedule complies with the Haneda curfew which, under the current U.S.-Japan Memorandum of Understanding, permits U.S.-Haneda operations only between 22:00 and 07:00. Departures from Haneda to U.S.-mainland points are not allowed before midnight. American's schedule depends on actual slot availability at Haneda. Ex. AA-103.

American's service will provide convenient both-direction connections between Haneda and 25 cities through its West Coast gateway, Los Angeles, in the summer season, and 32 cities in the winter season. Ex. AA-107. These connections will serve consumers across every region of the lower 48 states, including major U.S. population

centers such as Atlanta, Boston, Chicago, Dallas, Miami, New York, Philadelphia, San Francisco, and Washington, D.C. Ex. AA-107.

American proposes to operate the service with Boeing 777-200 (“B772”) aircraft. Initially, the aircraft will be in a 247-passenger configuration: 16 First Class, 37 Business Class, and 194 Economy Class. First and Business Class feature lie-flat seats, and all classes feature in-seat entertainment. Exs. AA-103-104. Throughout 2015, American will continue investing in its product and will phase in a new 260-seat configuration on the B772 fleet.

Finally, American’s B772 will have at least 20 tons of cargo capacity per flight, a significant addition to the Haneda market. (In contrast, Delta’s Seattle-Haneda service offers 7.3 tons.) Exs. AA-108-109 & AA-222.

III. American’s Proposal Will Best Serve the Public Interest

The remainder of this Application and the accompanying exhibits explain how American’s proposed Los Angeles-Haneda daily service will improve competition and maximize the public benefits by ending Delta’s significant and appalling underuse of a valuable slot pair for Seattle-Haneda. It also outlines the supporting information that the Department requested in Order 2014-12-9.

The accompanying direct testimonies of American’s President, Scott Kirby, and Senior Vice President and Chief Marketing Officer, Andrew Nocella, convey American’s commitment to expanding Haneda access and the critical importance of Los Angeles-Haneda service to American’s future. Exs. AA-T-1 & AA-T-2. The accompanying direct exhibits also show that American’s Los Angeles-Haneda proposal will provide vast

and immediate benefits to U.S. consumers and shippers in Southern California and throughout the United States. Specifically:

- Exhibit Series 100 identifies the contours of the proposed service, including the best connecting-market access of any airline.
- Exhibit Series 200 explains why Los Angeles is an ideal Haneda gateway and how American will bolster competition via a Los Angeles gateway.
- Exhibit Series 300 shows that American's service will provide far greater public benefit than Delta's Haneda service.
- Exhibit Series 400 summarizes the public benefits of American's Los Angeles-Haneda proposal.
- Exhibit Series 500 details the connecting information for American's Los Angeles-Haneda proposal.
- Exhibit Series 600 are letters of support for American's Los Angeles-Haneda proposal.

The Department has two choices in this proceeding. It can allow Delta to retain a U.S.-Haneda slot pair currently allocated to the Seattle-Haneda route, despite no use at all of that scarce resource for months at a time and underutilization in other months. Or, it can reallocate that slot pair to American, which will operate a **daily, year-round B772 service** on the Los Angeles-Haneda route to the benefit of consumers.

A. Delta's Current Use of a U.S.-Haneda Slot Pair for Seattle-Haneda Does Not Maximize the Public Benefits

A short review of the history of Delta's "use" of this slot pair is very telling. In the original (first) U.S.-Haneda Combination Services Allocation Proceeding in 2010, Delta proposed Detroit-Haneda service. It promised that the service would operate

daily.⁸ It promised that it would operate the service with B747-400 aircraft with 403 seats.⁹ It promised that the combination of Los Angeles or Seattle (for which it also applied) and Detroit service to Haneda would enable it to cover the entire United States – the U.S. western/mountain region via Los Angeles or Seattle and the U.S. eastern region via Detroit.¹⁰ The Department relied on Delta’s service promises and commitments in allocating this slot pair to Delta to operate Detroit-Haneda service. Exs. AA-301-304.

Delta did not deliver what it promised. No sooner was the ink dry on the Department’s Order than Delta pulled the 403-seat B747-400 from the Detroit route after just 37 flights. After the two month service hiatus caused by the tragic tsunami, Delta resumed service but with a significantly smaller 269-seat B777. The B777 aircraft also proved too large for Detroit-Haneda so, after just another three months of operations and 76 flights, Delta eliminated service for almost eight months. Then, when it resumed service for summer 2012, it once again downgauged the Detroit-Haneda aircraft to a 241-seat A330-200 aircraft. Exhibit AA-302 shows the effects of the downgrade and Delta’s performance over time.

Delta thus failed to follow through on its two “Detroit Promises” – B747 aircraft and daily service. Additionally, Delta’s promised “dual gateway/dual geography/dual access” plan never materialized due to the failure of the Detroit gateway – another Delta “Detroit Promise” unfulfilled.

⁸ See Application of Delta, Feb. 16, 2010, Docket DOT-OST-2010-0018, p. 1.

⁹ *Id* at 4.

¹⁰ *Id* at 2.

Months later, Delta petitioned the Department to switch the U.S. gateway for this Haneda slot pair from Detroit to Seattle. By applying for Seattle, Delta set up a situation in which it had two west coast gateways that overlap and compete with one another for Haneda traffic (*i.e.*, Los Angeles and Seattle),¹¹ and two Seattle-Tokyo routes (one to Haneda, one to Narita) that also overlap and compete with each other. Exhibit Series 300 graphically shows the degradation in Delta's U.S.-Haneda services over time.

Delta's promises about its Seattle-Haneda service, like its promises about Detroit service, were forgotten almost as soon as the Department's approval was finalized. Delta's first "Seattle Promise" – the promised B767-300ER – was downgraded to a B767 with fewer seats. Ex. AA-309. Delta's second "Seattle Promise" – to operate daily, year-round service – was not only broken, but broken in the extreme. In fact, Delta has not operated daily scheduled Seattle-Haneda service since November. The result can only be described as: **SEATLESS IN SEATTLE**. Exhibits AA-304 and AA-310-314 show graphically the story of a carrier allowing a service to deteriorate over time. Delta is neglecting the Seattle-Haneda route (evidenced by very low load factors), but not the Seattle-Narita route, which Delta continues to operate on a daily scheduled basis (at very high load factors). Exs. AA-322-323.

Delta does not attempt to justify the abdication of its responsibility to the Department and the travelling public to provide the promised daily scheduled service but, instead, to provide no service at all in winter and irregular service patterns during other parts of the year. Rather, Delta says that, because it is meeting the Department's

¹¹ Ex. AA-318, showing the overlap markets juxtaposed with the Seattle-specific markets.

dormancy rules, the Department cannot do anything about its abuse of a valuable slot pair, irrespective of the public interest. Indeed, Delta now threatens that, if the Department tries to do something about it, it will take the Department to court. (*See* Delta Pet. for Reconsideration at 8, Dec. 23, 2014).

With respect to Delta's Seattle-Haneda performance, the facts show that:

- Delta down-gauged the B767 configuration it promised, to a configuration with approximately six percent fewer seats;¹²
- Delta will have operated the route only 41 percent of the time – 421 flights in 1034 days (through March 31, 2015);¹³
- Delta will have gone for nearly three months without offering a single flight –from November 23, 2014 to February 13, 2015;¹⁴
- Delta will have operated seven or fewer flights in three months – November 2014 (seven flights), February 2015 (seven flights) and March 2015 (three flights);¹⁵ and
- Delta will have operated only 17 flights in a 182-day period.¹⁶

Delta may have provided just enough service to keep the frequencies from automatically reverting to the Department, but, nevertheless, it has eviscerated the public interest of making full and effective use of a scarce resource. Delta's use of a valuable Haneda slot pair to operate a seasonal service, where it (1) operates a paltry 17 flights in a 182-day span; (2) does not operate for months at a time; and (3) operates the smallest aircraft type capable of nonstop Seattle-Tokyo service is not maximizing the public benefits of a scarce resource.

¹² Ex. AA-309.

¹³ Ex. AA-310.

¹⁴ Ex. AA-311.

¹⁵ Ex. AA-312.

¹⁶ Ex. AA-312.

B. Delta's Self-Serving Retention of a Haneda Slot Pair, Which it is Woefully Underusing, is Thwarting Department Goals of Increasing Consumer Choice and Competition Among Carriers

Not only is the United States not realizing the maximum aviation or economic benefits achievable by the proper use of this resource, but Delta's non-use/underuse of the slot pair and its unwillingness (or refusal) to return it also thwarts the public interest by keeping it from being put to a higher and better use. Delta's actions are inhibiting an increase in robust competition in many ways.

First, Delta is hindering inter-U.S. carrier competition. American is the only U.S. airline serving Japan that has no Haneda authority. By hoarding a Haneda slot pair that it is using only sporadically (at best), Delta is preventing American from using that slot pair to provide daily year-round service from Los Angeles and, in the process, inject a new U.S. competitor to Haneda.

Second, Delta is also thwarting overall carrier competition in U.S.-Haneda markets. Every U.S. and Japanese carrier serving the Transpacific route, **except American**, has Haneda authority – Delta, United Air Lines, Inc. (“United”), Hawaiian Airlines, Inc., Japan Airlines Co. Ltd. (“JAL”), and All Nippon Airways Co., Ltd. (“ANA”). Ex. AA-207. By preventing American from operating Haneda service, Delta is keeping a vigorous and important competitor out of the market, and depriving consumers of an additional travel option.

Third, American's Los Angeles-Haneda service will provide vigorous and beneficial U.S. carrier competition to the Los Angeles-Haneda services operated by Delta and ANA. Ex. AA-400.

Fourth, at Los Angeles, both the SkyTeam and Star alliances (through the Haneda services of Delta and ANA, respectively) are present. There is no Los Angeles-Haneda service available on **oneworld**, although Los Angeles is the largest U.S.-Haneda O&D market. Exs. AA-203 & AA-208. By allowing American to operate its proposed Los Angeles-Haneda service, the Department will be injecting complete, three-way alliance competition in the largest Haneda O&D market from the U.S.

Finally, by preventing American from operating the Los Angeles-Haneda route, Delta is stymieing beneficial inter-gateway and inter-alliance competition between American at Los Angeles and United at San Francisco.

C. American Will Make Full and Effective Use of the U.S.-Haneda Slot Pair

In contrast to Delta's record of performance in both Detroit and Seattle, American's Los Angeles-Haneda service will fully utilize the slot pair and will provide superior economic and public interest benefits:

- American will use the largest aircraft for Los Angeles-Haneda service (B772 with 247 seats) – larger by 19 percent and 39 seats than Delta's B767 and larger by 11 percent and 24 seats than ANA's B777;¹⁷
- American's B772 at Los Angeles will be larger than the B767 that Delta uses at Seattle – by 36 seats and 17 percent;¹⁸
- American's B772 will provide nearly three times more cargo capacity than Delta's Seattle B767, which is an important and valuable benefit to shippers in the largest trading region of the world – Asia – and, on an annual basis, one million more pounds of cargo capacity than Delta's Seattle B767;¹⁹

¹⁷ Ex. AA-213.

¹⁸ Exs. AA-309 & AA-213.

¹⁹ Ex. AA-222.

- American's Los Angeles-Haneda service will provide more unique connections in both directions than Delta's Seattle-Haneda service (all of which, it should be noted, overlap and duplicate the connections on Delta's Seattle-Narita service);²⁰ and
- The size of American's Los Angeles-Haneda unique connecting market Tokyo O&D is twice the size of Delta's Seattle-Haneda unique connecting market.²¹

Clearly, under any measure of "maximizing public benefits," American's proposed daily year-round B772 Los Angeles-Haneda service is immeasurably superior to Delta's current irregular, sporadic Seattle-Haneda service. American's service will inject and increase competition among airlines and alliances and provide greater choice for consumers.

Wherefore, American respectfully urges the Department of Transportation to expeditiously grant its application to use one U.S.-Haneda slot pair at Los Angeles, and to grant such other or further relief as the Department deems appropriate.

Respectfully submitted,



Howard Kass
Robert A. Wirick
Abigail Donovan

²⁰ Ex. AA-214.

²¹ Ex. AA-215.

American's Responses to the Department's Information Requests

Information Request 1 (Service Proposal). American will provide year-round daily nonstop service between Haneda and Los Angeles International Airport.

American's proposed schedule complies with the Haneda curfew and times vary according to seasonal weather patterns.

American's proposed schedule will be:

Summer 2015 Schedule

Route	Departure Time (local)	Arrival Time (local)
LAX to HND	18:30	22:30+1
HND to LAX	00:00	18:30-1

Winter 2015 Schedule

Route	Departure Time (local)	Arrival Time (local)
LAX to HND	17:00	22:30+1
HND to LAX	00:00	17:00-1 ¹

As well established, under the current U.S.-Japan Memorandum of Understanding, operations between the U.S. and Haneda are permitted between 22:00 and 07:00, except that departures from Haneda to U.S.-mainland points are not allowed prior to midnight. These schedules also depend on actual slot availability at Haneda. While the normal service start-up conditions request by the Department is 90 days, American recognizes the value of this scarce resource and commits to start service 60 days after the issuance by the Department of a Final Order. American will make every effort to start earlier than

¹ Ex. AA-102.

its 60-day commitment, but, realistically and operationally, accelerating this already accelerated schedule may not be possible.

American's service will provide convenient both-direction connections between Haneda and 25 U.S. cities through its West Coast gateway, Los Angeles, in the summer season and 32 cities in the winter season. The connections will serve consumers across every region of the lower 48 states, including major U.S. population centers such as Atlanta, Boston, Chicago, Dallas, Miami, New York, Philadelphia, San Francisco, and Washington, D.C. Exhibits AA-501-502 contain nonstop-to-nonstop connecting schedules and elapsed times. There are no commercially viable beyond-Haneda markets.

American proposes to operate using the service with B772 aircraft. Initially, the aircraft will be in a 247-passenger configuration: 16 First Class, 37 Business Class, and 194 Economy Class. First and Business Class feature lie-flat seats, and all classes feature in-seat entertainment. Ex. AA-104.

Throughout 2015, American will continue the investment in its product and will phase in a new 260-seat configuration on the B772 fleet. The 260-seat configuration will consist of 45 Business Class, 55 Main Cabin Extra, and 160 Economy seats. The new Business Class product will feature new, personal Business Suites, each having a larger lie-flat bed than existing seats and direct aisle access. Main Cabin Extra seating will provide customers with up to six more inches of legroom. Finally, each seat on the aircraft will be equipped with a power outlet, USB port, and on-demand entertainment. WiFi will be available throughout the cabin during large portions of the flight. Finally, as

shown in Exhibits AA-103 and AA-222, American's B772 will have at least 20 tons of cargo capacity.

Information Request 2 (Existing Service). Currently, American offers nonstop service between Tokyo's Narita airport and Chicago (5x/6x per week), Dallas (twice daily), and Los Angeles (daily). American's oneworld partner Japan Airlines Co. Ltd. ("JAL") operates both Haneda and Narita to the United States. Under a code-sharing arrangement between American and JAL, approved by the Department, JAL displays the JL designator code on each of American's U.S.-Tokyo flights on a year round basis. (*See* DOT-OST-1999-4994, Notice of Action Taken, February, 18, 1999.) In addition, American places its AA designator code on a year round basis on flights operated by JAL between Tokyo (Haneda) and Honolulu and San Francisco, and between Tokyo (Narita) and other U.S. points, including Boston, Chicago, Honolulu, Los Angeles, and San Diego.

Information Request 3 (Public Benefits). The public benefits are more thoroughly described at pages 5-11 of the Application and at Exhibit AA-401. In summary, American's Los Angeles-Haneda service will provide competitive access to many new U.S. markets, will increase consumer choice in existing markets, and will inject much-needed competition into this strategically important market.

- a. **Service benefits.** American will serve Los Angeles, the largest U.S.-mainland O&D market to Tokyo, 4.6 times larger than Seattle. Ex. AA-205. Today, Los Angeles is underserved in the U.S.-Tokyo market, with 37 percent fewer seats than Seattle per Tokyo O&D passenger. Ex. AA-210. American's proposed service will inject needed Tokyo capacity at Los Angeles and will provide convenient one-stop connecting to the rest of the United States.

- b. Increased intra-gateway and inter-alliance competition.** American's new proposed service will increase competition and maximize the benefits from the Haneda slot pairs. At Los Angeles, American will compete with Delta and All Nippon Airways Co., Ltd. ("ANA"), as well as with United Air Lines, Inc. ("United") at San Francisco. Additionally, the oneworld alliance will gain a Los Angeles-Haneda service for the first time, increasing inter-alliance competition with Delta (SkyTeam Alliance) and ANA (Star Alliance).

American will provide access to more connecting markets from Los Angeles than does Delta's existing Los Angeles-Haneda/Narita and Seattle-Haneda services. Exs. AA-214-216, & -218. It will also provide access to connecting markets that ANA's Los Angeles-Haneda service does not reach. Ex. AA-220.

American's service will contribute to American's expansion of its Los Angeles hub. Since 2013, it has added several new nonstop flights serving both domestic and international destinations. As part of American's efforts to cement its status as a leading global airline, it is investing millions of dollars to transform and expand its Los Angeles operation. American will continue to make significant investments at Los Angeles, including broadening its route network and enhancing its facilities. Ex. AA-T-1.

- c. Increased U.S.-Asia competition.** American's top international objective is to increase its presence in Asia, thereby enhancing its network offerings to consumers and competitive position as a leading U.S.-based global international air carrier. Asia continues to be among the fastest-growing aviation markets in the world.

Information Request 4 (Aircraft Availability). The B772 aircraft to operate the proposed Los Angeles-Haneda service are already within American's fleet. American uses 47 B772s on both international and domestic routes. All of American's B772s are FAR-36 compliant.

Information Request 5 (Fuel Use and Availability). American estimates that it will consume 17,867,000 gallons of fuel annually to provide the proposed service. It anticipates no difficulty in obtaining fuel from its existing suppliers at Los Angeles and no difficulty in re-establishing its relationship in Haneda. Ex. AA-103.

Information Request 6 (Start-Up Condition). American will accept a 60-day start-up condition requiring institution of service. We respectfully request 60 days after the Department issues a final order re-allocating the slot pair to American (subject to obtaining the appropriate approvals from the Japanese government).

CERTIFICATE OF SERVICE

I, Abigail Donovan, certify that, on January 5, 2015, I caused to be served a copy of the foregoing Application of American Airlines, Inc. by email upon those addressees listed below:

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Abigail Donovan

APPLICATION AND DIRECT EXHIBITS OF AMERICAN AIRLINES

2010 U.S.-HANEDA COMBINATION SERVICES ALLOCATION PROCEEDING
(HANEDA 2014)

Docket DOT-OST-2010-0018

January 5, 2015



Tokyo Haneda



Los Angeles

American Airlines



Direct Exhibits of American Airlines

Exhibit Number	Title
AA-T-1	Direct Testimony of J. Scott Kirby
AA-T-2	Direct Testimony of Andrew P. Nocella
AA-100	Narrative to the 100 Series
AA-101	American Airlines' Proposed Los Angeles-Haneda Service
AA-102	American Airlines' Proposed LAX-HND Schedule and Service
AA-103	American Airlines' Proposed LAX-HND Operating Statistics
AA-104	American Airlines' B777-200 Seat Configuration
AA-105	American Airlines' Connecting Aircraft Seat Configuration
AA-106	American Airlines' Los Angeles Hub Connects 58 Airports to LAX
AA-107	American's Proposed Los Angeles-Haneda Service Connecting Market Summary for Markets Connecting in Both Directions
AA-108	American Airlines' LAX-HND Cargo Capacity at 100% Load Factor
AA-109	American Airlines' LAX-HND Cargo Capacity at 80% Load Factor
AA-200	Narrative to the 200 Series
AA-201	Los Angeles Is, By Far, the Largest Continental U.S. Market to Tokyo – Twice as Large as the Next Largest Market with Haneda Service (SFO) and 4.6 Times the Size of Seattle
AA-202	Los Angeles Has Almost 340,000 More Annual O&D Passengers to Tokyo Than Seattle

Direct Exhibits of American Airlines

Exhibit Number	Title
AA-203	Los Angeles Is, By Far, the Largest Continental U.S. Market to Haneda
AA-204	Los Angeles Has Almost 80,000 More Annual O&D Passengers to Haneda Than Seattle
AA-205	Los Angeles–Tokyo Demand Is 4.6 Times the Demand of Seattle-Tokyo
AA-206	Los Angeles–Haneda Demand Is 4.9 Times the Demand of Seattle-Haneda
AA-207	American Is the Only U.S. Airline Serving Japan That Does Not Have Access to Haneda
AA-208	Oneworld Is the Only Alliance Without LAX Access to Haneda
AA-209	Los Angeles' Tokyo O&D Is Almost Five The Size of Seattle's O&D – Almost 340, 000 More Passengers
AA-210	LAX-Tokyo Is Underserved Relative to SEA-Tokyo: SEA Has 37% More Seats per O&D Tokyo Passenger Than Los Angeles
AA-211	LAX-Haneda Is Underserved Relative to SEA-Haneda Under Any Measure
AA-212	The Los Angeles Market Needs More Flights Than Seattle to Accommodate Unfulfilled Demand
AA-213	American Will Be Able to Fill the Unmet Demand at LAX by Operating the Most Seats on LAX-HND . . . and More Premium Seats Than Delta
AA-214	American's LAX-HND Service Will Serve More Unique U.S. Connecting Markets Than Delta's Existing SEA-HND Service
AA-215	American's LAX-HND Connecting Markets Generate Over 210,000 More O&D Passengers Than Delta's SEA Connecting Markets
AA-216	American's LAX-HND Service Will Serve Almost 2.5 Times as Many Unique Connecting Markets as Hawaiian's Existing HNL-HND Service

[Direct Exhibits of American Airlines](#)

Exhibit Number	Title
AA-217	American's LAX-HND Connecting Markets Generate 324,000 More O&D Passengers Than Hawaiian's HNL Connecting Markets
AA-218	American's Proposed LAX-HND Service Will Serve 20% More Unique U.S. Connecting Markets Than Delta's Existing LAX-HND Service
AA-219	American's LAX Connecting Markets Generate Over 256,000 O&D Passengers
AA-220	American's LAX-HND Service Will Serve 6 Times More Unique Connecting Markets Than ANA's Existing LAX-HND Service
AA-221	American's LAX-HND Connecting Markets Generate Almost One Million More O&D Passengers Than ANA's LAX-NRT Connecting Markets
AA-222	American's B777 Will Provide Superior Cargo Capacity to Delta's B767
AA-300	Narrative to the 300 Series
AA-301	Delta's Failed Detroit-Haneda Commitment
AA-302	<u><i>Delta's Failed Detroit-Haneda Commitment</i></u> : Even Eliminating April and May 2011 as "Tsunami-Related" Service Interruption Months, Delta Operated Only 42% of the Flights and Offered Only 28% of the Seats It Promised to Provide in the Detroit-Haneda Market
AA-303	<u><i>Delta's Failed Detroit-Haneda Commitment</i></u> : Flights Committed versus Flights Flown
AA-304	<u><i>Delta's Failed Detroit-Haneda Commitment</i></u> : Seats Committed versus Seats Flown
AA-305	Delta's Failed Los Angeles-Haneda Commitment
AA-306	<u><i>Delta's Failed Los Angeles-Haneda Commitment</i></u> : Delta's Dwindling Los Angeles-Haneda Aircraft Size

Direct Exhibits of American Airlines

Exhibit Number	Title
AA-307	<u>Delta's Failed Los Angeles-Haneda Commitment</u> : Seats Committed versus Seats Flown
AA-308	Delta's Failed Seattle Commitments . . . And There are Several
AA-309	<u>Delta's Failed Seattle-Haneda Commitment</u> : Delta Has Not Lived Up to Its Substantially-Scaled Back Seattle-Haneda Service Proposal
AA-310	<u>Delta's Failed Seattle-Haneda Commitment</u> : Seatless in Seattle Delta's Current Seattle-Haneda "Offering"
AA-311	<u>Delta's Failed Seattle-Haneda Commitment</u> : Seatless in Seattle A Picture is Worth a 1,000 Words
AA-312	<u>Delta's Failed Seattle-Haneda Commitment</u> : Seatless in Seattle Delta Has Constructively Abandoned the Seattle-Haneda Market Since October 2014
AA-313	<u>Delta's Failed Seattle-Haneda Commitment</u> : Seatless in Seattle Since Delta Inaugurated Seattle-Haneda Service, It Will Have Operated a Daily Service in Only 4 of the 22 Months Through March 2015 and in Only One Month Since August 2013
AA-314	<u>Delta's Failed Seattle-Haneda Commitment</u> : Seatless in Seattle Delta Has Provided Over 62% Fewer Seats – Close to 289,000 Seats – Than It Committed to Provide Under Its Scaled-Back August 2012 Seattle-Haneda Service Proposal
AA-315	While Delta Has Abandoned the Seattle-Haneda Market, It Has Maintained Its Full Daily Schedule of Seattle-Narita Flights
AA-316	. . . Delta Offers More Than Twice the Number of Seats on the Seattle-Narita Route as It Offers on the Seattle-Haneda Route

Direct Exhibits of American Airlines

Exhibit Number	Title
AA-317	<i>Delta Competes With Itself at Seattle</i> : Delta's Seattle-Haneda Route Offers No Connecting U.S. Markets Not Already Offered on Delta's Seattle-Narita Route for U.S. Connecting Traffic
AA-318	<i>Delta Competes With Itself to Haneda</i> : There are More Overlap Markets Between Delta's SEA-HND and LAX-HND Services Than Unique Markets on Either Route
AA-319	<i>Delta Competes With Itself to Tokyo</i> : Delta's Seattle-Haneda Route Competes and Overlaps with Delta's Los Angeles-Narita Route for U.S. Connecting Traffic and . . . The Only Six Unique SEA-HND Connecting Points Account for Only 47 O&D Passengers (PPDEW) to Tokyo
AA-320	Delta Has the Lowest Load Factor, By Far, of Any Airline Operating U.S.–Haneda Service
AA-321	Delta Had Almost as Many Empty Seats as It Had Occupied Seats on Its Seattle-Haneda Flights
AA-322	Delta's Seattle-Haneda Load Factor is 39% Lower Than Its Asia Load Factor and 40% Lower Than Its System Load Factor
AA-323	In Contrast to Delta's SEA-HND Load Factor of 51%, Delta's LAX-HND Route Experiences a Load Factor of 77.4%, Delta's SEA-NRT Route Experiences a Load Factor of 89.7%, and Its Los Angeles-Haneda Route Enjoys a Load Factor of 90.4%
AA-324	"Seasonality" Is an Excuse Concocted by Delta for Ceasing Seattle-Haneda Service; It Is Not a Reality
AA-401	Allocating to American a Haneda Slot Pair to Operate the Los Angeles-Haneda Route Maximizes the Public Benefits of a Scarce Resource
AA-501	Connecting Detail–Summer Westbound (LAX-HND); Connecting Detail–Summer Eastbound (HND-LAX)
AA-502	Connecting Detail–Winter Westbound (LAX-HND); Connecting Detail–Winter Eastbound (HND-LAX)

[Direct Exhibits of American Airlines](#)

Exhibit Number	Title
AA-503	Cargo Capacity for Flights Connecting to American's LAX-HND Service at 100% Load Factor
AA-504	Cargo Capacity for Flights Connecting to American's LAX-HND Service at 80% Load Factor
AA-600	Letters of Support

Direct Testimony



Testimony of J. Scott Kirby

President

January 5, 2015

My name is J. Scott Kirby and I am the President of American Airlines, Inc. ("American"). On behalf of American, and American's 100,000+ dedicated employees, I am proud to submit this testimony in support of our application to the U.S. Department of Transportation for the allocation of one slot pair to serve Tokyo's Haneda International Airport on a daily basis from Los Angeles, California, beginning promptly after the issuance of a Final Order by the Department.

American appreciates that the Department will make its decision in this carrier-selection proceeding on the basis of what is the highest and best use of the scarce and highly valuable Haneda slot pair for the benefit of consumers and competition. The Department has consistently strived to make decisions that allow more choices for consumers by creating an environment in which all carriers have opportunities to compete.

In this proceeding, the Department will have the ability not only to consider the best use of this Haneda slot pair, but also will have the opportunity to enhance consumer benefits in the key U.S.-Japan market by providing more competition for the incumbent carriers. My testimony focuses on the commitment of American to provide a strong competitive balance in the U.S.-Asia market and to maximize the public benefits of the scarce resource of Haneda slot pairs.

Background

After its merger with US Airways, American is the largest U.S. airline, operating nearly 6,700 flights around the globe, to more than 335 locations in more than 50 countries. While these are impressive statistics, we still have much to do to achieve our goal of reestablishing American as the world's greatest airline, providing industry leading service to all parts of the world and offering a great product for customers. Indeed, our current marketing campaign centers on our "Going for Great."

We have a lot of work in front of us and one of the greatest challenges is increasing American's footprint in Asia. It is no secret that American trails Delta and United in terms of our Asia presence and, thus, our ability to provide our customers with greater service options and travel choices. Some of this is due to historical reasons that have, as a practical and legal matter,

precluded American from competing on an even footing with United and Delta, which, through their acquisition of Pan American's Asian routes and Northwest, respectively, inherited incumbency

status in Japan and a many decades headstart on American. It is therefore absolutely necessary that we build American's Asia presence so we can offer consumers greater choices and be able to compete with Delta and United. This is, in fact, our top international priority at American.

No airline can have a strong presence in Asia without having a strong presence in Japan, and specifically in Tokyo – one of Asia's premier business and leisure destinations. Now that Haneda has re-opened to services between Tokyo and the U.S., in order to have a meaningful presence in Tokyo, service to Haneda is a necessity. Like LaGuardia in New York and Reagan National in Washington, D.C., Haneda is close to downtown, and heavily business-oriented, making it a popular airport for travel in and out of Tokyo. Today, American is the only U.S. global network carrier that cannot operate its own aircraft at Haneda, depriving our customers from the service options and convenience available to Delta and United customers.

Moreover, as demonstrated in our exhibits, as I briefly describe below, and as more fully explained in the testimony of Andrew P. Nocella, American's Senior Vice President and Chief Marketing Officer, not only is the grant of American's application in this proceeding critical to our development of Tokyo, and our overall Asia presence, it also fulfills the Department's overriding objective of maximizing the public benefits by providing: (1) superior consumer travel options and choices; (2) superior competitive benefits by injecting a new competitor at Haneda; (3) new intra-gateway competition at LAX; (4) additional inter-gateway competition between LAX and SFO; (5) first-time inter-alliance competition at LAX among all three alliances; and (6) a service that will use the Haneda slot pair 365 days a year.

A New American Strategy for Asia Post-Merger with US Airways

Before the American-US Airways merger was completed, many hours were spent undertaking a thorough review of American and US Airways' services and strategy around the world, including the Asia-Pacific region. This examination provided a blueprint of where the new American was well-positioned, but also showed where we needed to improve the network. This review, in which I was deeply involved, permitted a fresh look and a new perspective to the service deficit facing the new American in Asia. Completing this study enabled us to hit the ground running, and to immediately begin implementing an enhanced Asia-Pacific strategy for American.

Our analysis identified four major areas of improvement that would help us fulfill our goal of achieving a market penetration level in Asia that is competitive with Delta and United: (1) a deeper overall Asia presence and service pattern; (2) a return as soon as possible to Tokyo's most important airport, Haneda; (3) enhanced focus on American's Los Angeles hub as an Asian gateway; and (4) and substantial investment in product upgrade from airports to aircraft and check-in lobbies to inflight entertainment -- investments essential to attract new customers and retain our loyal customers for these long-haul flights and to enhance all of our customers' experience, from before the flight is booked until their checked bags are delivered.

Consistent with our priorities, American has already made progress in the first of these areas (see the next section) and the fourth (see the section below). Gaining access to Haneda in this proceeding would accomplish the second objective and is a key building block in the development of the third objective.

American's Asia-Pacific Expansion

The first 12 months since the merger have seen American already expanding and strengthening its presence in the Asia-Pacific region, one of the world's fastest growing aviation areas, and providing consumers greater travel options and opportunities. Specifically, in 2014 alone, American:

- Inaugurated new daily Dallas/Fort Worth (DFW)-Hong Kong nonstop service to the American route network;
- Inaugurated daily DFW-Shanghai service, complementing American's existing service from Chicago and Los Angeles;
- Received Department of Transportation authority to begin a new daily flight between DFW and Beijing in May 2015; and,
- Improved schedules, beginning in summer 2015, on our current U.S.-China services, with the acquisition of better slot times in Beijing and Shanghai.

The next step is to fill the remaining critical gap – service to Haneda, where American currently has no slot pair allocation, and, thus, is unable to provide its own service, unable to provide consumers with greater travel options and unable to provide competition to Delta and United.

American's Investment and Expansion at its Los Angeles Hub

American is the largest carrier at Los Angeles, and is developing LAX as its West Coast gateway to better compete long-term with Delta and United, both which already benefit from strong gateways on the West Coast – Seattle and San Francisco, respectively, as well as the large number of Asian airlines serving LAX. Indeed, in 2014, we added five new destinations and seven new flights to our Los Angeles hub. We have also invested in our infrastructure by transforming and reinventing our Los Angeles facilities, all to provide more efficient and more enjoyable travel experiences for all consumers.

American's Investment in Fleet Overhaul

After taking delivery of nearly 100 new aircraft in 2014, American already has the youngest fleet of the global U.S. air carriers. Yet, our work is not done. American is investing billions in creating a fleet that offers our customers a world-class travel experience, and will enable the new American to more proudly represent the United States around the globe. This year, American will take delivery of 112 new aircraft, including the B787, and an additional 84 new aircraft in 2016.

In addition to taking delivery of new aircraft, we are refurbishing our Boeing 777-200, 767-300, and 757 fleets with new seats, refreshed cabins, and onboard power outlets – improvements that will enhance the inflight experiences of all consumers. When complete, nearly every American intercontinental wide-body jet will feature fully lie-flat seats with direct aisle access in premium cabins, and nearly all American aircraft, including our large regional jets, will have WiFi capability.

We have made great progress in our goal of enhancing the travel experiences available to both business and leisure passengers. Yet, what American has achieved so far in the Asia-Pacific region, at Los Angeles International Airport, and in renewing and upgrading its product is not the culmination of our work, it is only the start. We have much more work to do, and we will do it; but the first international network priority we must address to provide greater options to the traveling public is the lack of any Haneda service by American.

American's Superior Haneda Proposal

This proceeding is a critical step, not only to fulfill our objective to compete directly at Haneda, but to ensure that the public benefits from these limited resources are maximized.

Our proposed daily year-round Boeing 777 service will give millions of travelers and shippers a new, viable travel option to Haneda that they don't have today. As more fully explained by Mr. Nocella, American's proposed Haneda service also will provide substantial inter-carrier competition to the two largest U.S. carriers serving Asia, Delta and United, as well as to the Japanese and third country airlines serving LAX; provide inter-alliance competition to SkyTeam and Star Alliance; and provide real, meaningful inter- and intra-gateway competition. Only an allocation to American will maximize the public benefits and produce the greatest consumer benefits and the greatest economic "return" on the utilization of the scarce national resource of Haneda slot pairs.

We have come a long way in just one year since our merger. We are all proud of what the new American has achieved to this point, but we are equally excited about what the future achievements will mean for American, for competition, for our customers and for all travelers and consumers, as well as the cargo shipper community. On behalf of the millions of American customers and over 100,000 proud American employees, we look forward to building on these achievements as a new competitor at Tokyo's Haneda airport in 2015 and respectfully request the Department to allocate to American the Haneda slot pair that is the subject of this proceeding to allow American to operate a daily, year-round B777 service from Los Angeles to Haneda.

Thank you.

Respectfully Submitted,



J. Scott Kirby



Testimony of Andrew P. Nocella

Senior Vice President and Chief Marketing Officer

January 5, 2015

My name is Andrew P. Nocella, and I am the Senior Vice President and Chief Marketing Officer of American Airlines, Inc. I submit this testimony in support of American's application to the U.S. Department of Transportation for the award of one slot pair to serve Tokyo's Haneda International Airport on a daily basis from Los Angeles, California, beginning in 2015.

As the testimony of American's President, Scott Kirby, indicates, expanding American's current level of services offered in Asia is a top priority for the new American. In Mr. Kirby's testimony, he describes the efforts that the new American has undertaken to begin the process of enlarging American's presence in this most important region of the world, and one in which, historically, American has lacked a presence sufficient to compete with Delta and United. As the senior officer with full responsibility for American's network and commercial offerings, I concur with everything that Mr. Kirby states, but especially the importance we at American place on building up our Asia service offering for the benefit of consumers and shippers.

Importance of Haneda Service to American

We have in the one year since the merger, and the start of the new American, achieved a lot. However, much more remains to be done to give American a strong competitive presence in Asia's most important markets. Addressing the lack of any American service at all to Haneda is critical to American's Asia presence, enhancing our network to be competitive with United and Delta, and giving the travelling public meaningful choices. Gaining access to Haneda heads the list of American's top international priorities.

American service to Haneda is critical because having a strong presence in Japan is an anchor for any U.S. airline's Asian service. However, an airline cannot have a strong Asian presence if it does not have a strong presence in Japan. A strong presence in Japan means a strong presence in Tokyo. And, since the reopening of U.S. carrier services to Haneda, a strong presence in Tokyo requires a presence in Haneda, albeit not a large presence because of the current bilateral limitations limiting the United States to only four slot pairs, but at least a presence on a comparable footing to United and Delta.

This is because Haneda is Tokyo's close-in airport. It is, by far, the preferred airport for the business traveler going to or from Japan. All U.S. passenger airlines serving Japan and all Japanese

airlines serving the United States have Haneda authority except for American. American simply cannot compete on that basis and provide consumers with greater travel options. Consumers have no access on American aircraft to Haneda, and the choice for them is to either go to Narita on American or go to Haneda on an airline other than American. In essence, consumers are deprived of the ability to have an “American/Haneda” option, and American passengers alone have no ability to choose between flying into or out of Haneda or Narita, unlike passengers on every other U.S. and Japanese carrier flying between the United States and Japan.

American’s Proposed LAX-Haneda Service Provides Superior Public Benefits to Delta’s Very Infrequent Seattle-Haneda Service

American’s Los Angeles-Haneda service would fully utilize the Haneda slots and would provide superior economic and public interest benefits:

- American will utilize the largest aircraft for LAX-Haneda service (B777 with 247 seats) – larger by 19% and 39 seats than Delta’s B767 and larger by 11% and 25 seats than ANA’s B777 (Exhibit AA-104; AA-213);
- American’s B777 at LAX will be larger than the B767 that Delta uses at Seattle – by 36 seats and 17% (Exhibit AA-104; AA-306);
- American’s LAX-Haneda service will provide more unique connections in both directions than Delta’s Seattle-Haneda service (Exhibit AA-214), (which, I should add, overlaps and duplicate the connections on Delta’s Seattle-Narita service - Exhibit AA-317), and more unique connections in both directions than Delta’s Los Angeles-Haneda service (Exhibit AA-218); and,
- American’s Los Angeles-Haneda unique connecting markets Tokyo O&D generates 200,000 more passengers than Delta’s Seattle-Haneda unique connecting market Tokyo O&D (Exhibit AA-215) and 256,000 more Tokyo O&D than Delta’s Los Angeles-Haneda unique connecting market Tokyo O&D (Exhibit AA-219).

In all significant respects, American’s plan to use the Haneda slot pair that is the subject of this proceeding is, far and away, superior to Delta’s on again-off again use of those slots for Seattle-Haneda service. First, with respect to Delta’s Seattle-Haneda service, American’s direct exhibits show, among other things:

- Delta has operated the Seattle-Haneda route 421 days of the possible 1,034 days since it inaugurated that route through March 30, 2015 -- only 41% of the time (Exhibit AA-310);
- Delta has operated a daily schedule only four months out of the 22 months that it will have operated the route through March 2015 (Exhibit AA-313);

- Delta will have gone for weeks and months – in fact 82 days in a row (November 23, 2014 through February 12, 2015) without providing any service on the Seattle-Haneda route and will operate only 17 flights in the 182 day period from October 1, 2014 to March 31, 2015 (Exhibit AA-311); and,
- Delta's load factor on the Seattle-Haneda route, by any standard, is abysmal at 51.1%, and it is, by a wide margin, the lowest of all load factors of any service between the United States and Haneda (Exhibit AA-320).

Delta's Seattle-Haneda service speaks for itself: whatever benefits Delta touted about its Seattle-Haneda service have been eliminated or substantially diminished by Delta's non-existent or minimal flight schedules; Delta's woeful utilization of this slot pair is not an optimum, or even a good, use of this valuable resource or a maximization of U.S. economic benefits; and it does not provide any, let alone robust, competition on any basis deemed important by the Department. It is hard to inject competition when you don't fly, but it is easy to prevent competition when you deny others the opportunity to utilize appropriately the scarce Haneda slot pair, as well as block progress at the negotiating table.

And, while Delta maintains control of the Seattle-Haneda slot pair by operating sporadically, it should be noted that:

- Every other Haneda service, operated by U.S. and Japanese carriers alike, operates on a daily basis (Exhibit AA-324, p 5-7);
- Delta continues to operate its Seattle-Narita service on a daily basis and with a larger aircraft (Exhibit AA-324, p 2); and
- Despite irregular operations, at best, on the Seattle-Haneda route, Delta continues to have the most flights between the United States and Tokyo of any airline, Japanese or U.S. (Exhibit AA-313)

None of the public or economic benefits that the valuable Haneda flights can provide is being realized by Delta holding this Haneda slot pair and not utilizing it, day in and day out, week in and week out, month in and month out. Every other airline operating to Haneda – U.S., Japanese, or third country – is maximizing the benefits of its Haneda slot pair by operating on at least a daily basis.

Robust Competition Would be Enhanced by American's Proposed LAX-Haneda Service

Delta's failure to operate a daily service on the Seattle-Haneda route significantly underutilizes a scarce and valuable aviation resource of the United States. Not only is the United States not realizing the maximum aviation or economic benefits achievable by proper utilization of this resource, but both the public interest and competition are being thwarted by Delta's non-utilization and underutilization of the Haneda slot pair and its unwillingness either to operate the

service on a year-round daily basis or return the Seattle-Haneda slot pair so that they can be put a higher and better use. Delta's actions are inhibiting robust competition in a number of ways:

- Inter-U.S. carrier competition: Delta is thwarting inter-U.S. carrier competition. American is the only U.S. airline that has no Haneda authority (Exhibit AA-207). By retaining a Haneda slot pair which it is not using in any meaningful or appropriate fashion, Delta is preventing American from using that slot pair to provide daily, year-round service from Los Angeles and, in the process, inject a new U.S. competitor to Haneda.
- Inter-carrier competition: Delta is also thwarting overall carrier competition to Haneda. Every other U.S. and Japanese carrier serving Japan has Haneda authority (Delta, United, Hawaiian, JAL and ANA) except American (Exhibit AA-207). By preventing American from operating its proposed LAX-Haneda, Delta is keeping a vigorous and important competitor out of the market.
- Intra-gateway competition: American's Los Angeles-Haneda service will provide real and beneficial U.S. carrier competition to Delta's Los Angeles-Haneda service in the largest US-Tokyo O&D market, as well as additional intra-gateway competition to ANA at Los Angeles.
- Intra-gateway alliance competition: At Los Angeles, only the SkyTeam and Star alliances (through the Haneda services of Delta and ANA, respectively) are present. There is no LAX-Haneda service available on oneworld, even though LAX is the largest Haneda O&D market in the U.S. By allowing American to operate its proposed LAX-Haneda service, the Department will be injecting complete, three-way alliance competition in this, the largest Haneda O&D market from the U.S.
- Enhanced inter-gateway, inter-alliance competition: By preventing American from operating the LAX-Haneda route, Delta is stymieing beneficial inter-gateway and inter-alliance competition between American at LAX and United at SFO.

Clearly, by maintaining control of valuable Haneda slot pair that are, unarguably, being underutilized, at best, and unutilized, at worst, and by shutting American out of Haneda service at all, Delta is preventing robust competitive forces to work in the marketplace. This situation also deprives a substantial segment of the travelling and shipping public –and all of American's passengers– from having any access to Haneda on American's services. None of this maximizes the economic benefits to the United States, enhances competition or serves or benefits the consumer.

As I stated at the beginning of my testimony, gaining access to Tokyo's Haneda International Airport is a top American priority. Seeing that the valuable and scarce Haneda slot assets are utilized in a fashion that maximizes consumer benefits, competition and economic benefits to the entire United States is clearly a Department objective. By allocating to American the authority to operate Los Angeles-Haneda service, both of these important objectives can be achieved.

I thank you for the opportunity to present this testimony on behalf of American and on behalf of our tremendous and caring workforce. We are incredibly fortunate to have had the opportunity to steward American Airlines to a position of industry leadership and create an environment in which its employees are proud to work and an airline on which our customers are proud to fly. The management of American fully intends to continue down this path and to provide all consumers with the greatest and most passenger friendly services possible. Being able to fly Los Angeles-Haneda is an important step in fulfilling that objective.

Thank you.

Respectfully Submitted,

A handwritten signature in blue ink, appearing to read 'A.P. Nocella', with a long horizontal flourish extending to the right.

Andrew P. Nocella

Series 100: Schedule and Equipment

NARRATIVE TO THE 100 SERIES OF EXHIBITS

The 100 Series of Exhibits details American Airlines' proposed Los Angeles-Haneda service, and provides required information as detailed in the Instituting Order.

Exhibit AA-101 is a map depicting American Airlines' proposed Los Angeles-Tokyo Haneda service. Exhibit AA-102 shows the detailed schedule for the Los Angeles-Haneda service, including flight numbers, aircraft type (Boeing 777-200), departure/arrival times and elapsed times to/from Los Angeles and Tokyo Haneda. This information is provided for summer and winter season.

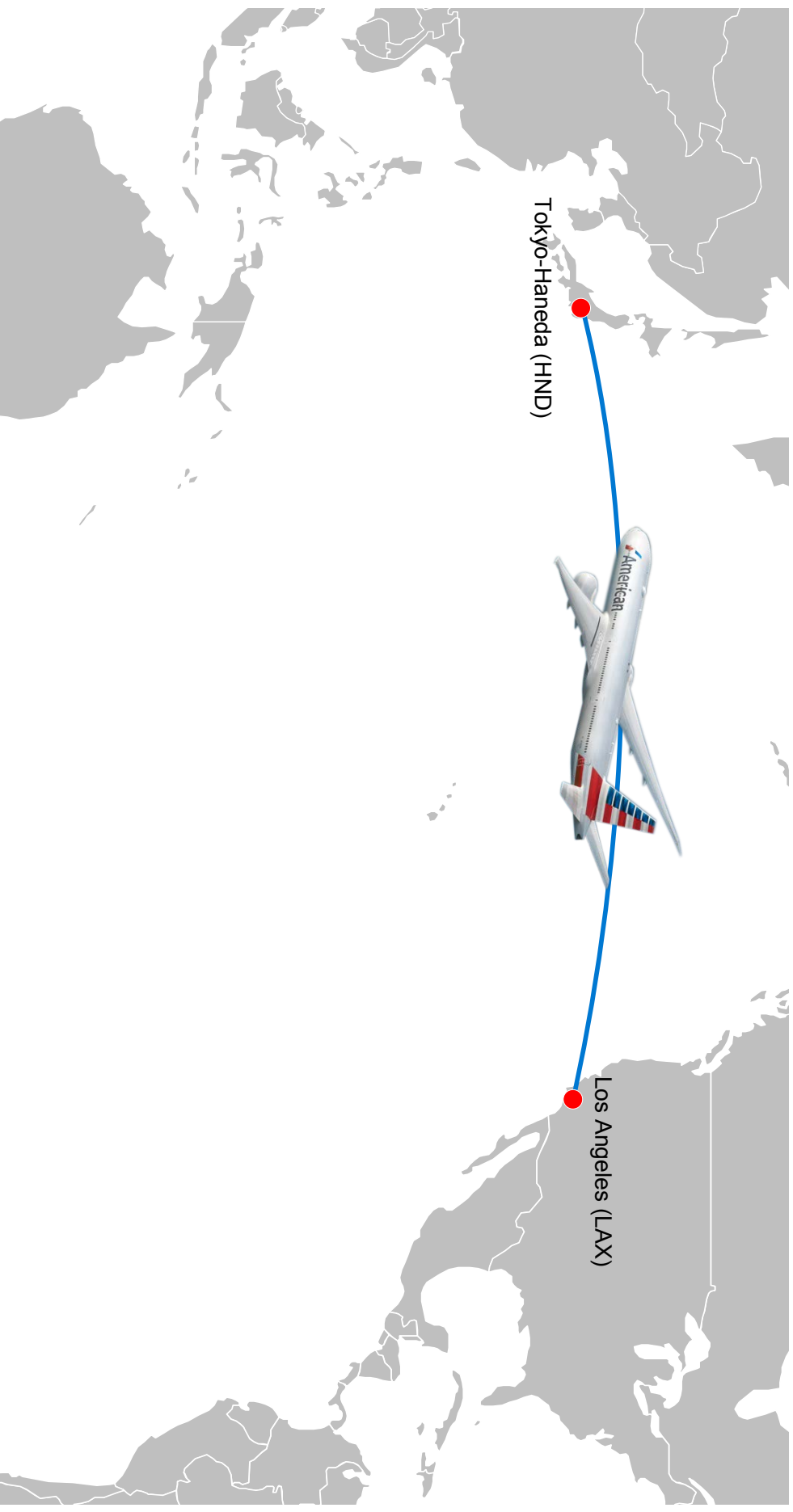
Exhibit AA-103 illustrates the detailed operating statistics for the proposed route including estimated fuel burn and the seating configuration of the 777-200 aircraft (AA-104).

Exhibit AA-105 shows the seating configurations of American and US Airways aircraft that will connect at Los Angeles. Exhibit AA-106 illustrates the size and breadth of the American's Los Angeles hub which connects our passengers to 58 airports on five continents.

Exhibit AA-107 shows the number of connections that the American LAX-Haneda service will connect in both directions during both the summer and winter traffic seasons. More detailed schedule information is also provided in AA Exhibits 501 and 502.

Exhibits AA-108 and 109 provide summaries of American's daily cargo capability on the Los Angeles-Haneda route. Additional cargo information is also available in Exhibits AA-503 and 504.

American Airlines' Proposed Los Angeles–Haneda Service



American Airlines' Proposed LAX-HND Schedule and Service

AMERICAN AIRLINES LAX-HND Daily Nonstop Service			
Summer (March-October) 2015			
<u>AA 125</u>	<u>Flight Number</u>	<u>AA 126</u>	
Daily B772*	Frequency Equipment	Daily B772	
1830	Los Angeles (LAX)	1830(-1) ^	
V			
2230 (+1)	Tokyo Haneda (HND)	0000	
12:00	Elapsed Time	10:30	

AMERICAN AIRLINES LAX-HND Daily Nonstop Service			
Winter (October-March) 2015-16			
<u>AA 125</u>	<u>Flight Number</u>	<u>AA 126</u>	
Daily B772	Frequency Equipment	Daily B772	
1700	Los Angeles (LAX)	1700(-1) ^	
V			
2230 (+1)	Tokyo Haneda (HND)	0000	
12:30	Elapsed Time	10:00	

* B772 = Boeing 777-200

American Airlines' Proposed LAX-HND Operating Statistics

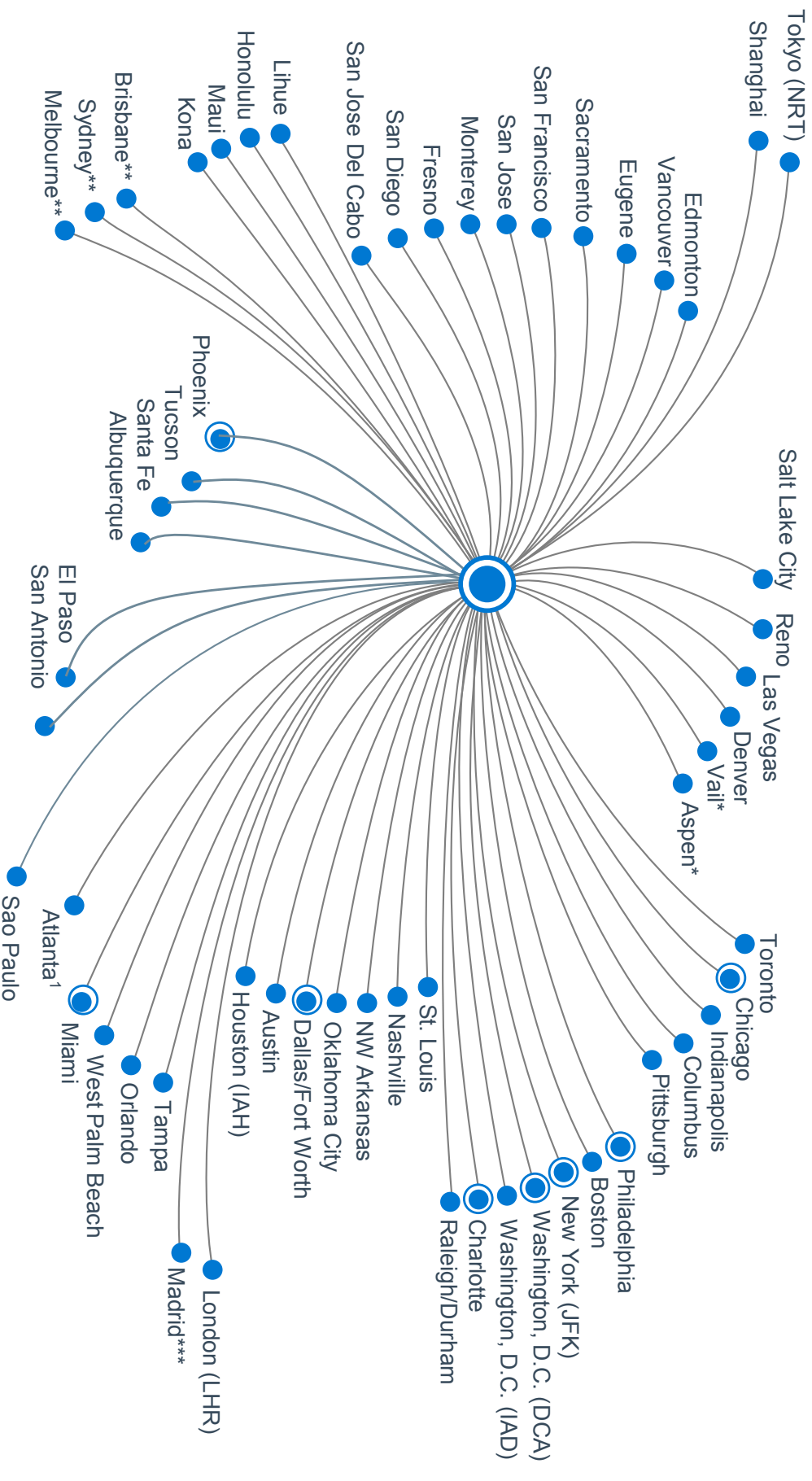
AMERICAN AIRLINES
LAX-HND Service
Annual Operating Statistics (Daily)
Summer and Winter

Aircraft	B772
Departures	730
Segment Miles	5,488
Plane Miles	4,006,240
ASMs	989,541,280
Fuel Burn (Gallons/Hour)	2,320
Fuel Consumption (000 Gallons)	17,867
Seating Configuration	
First Class	16
Business Class	37
Economy Class	<u>194</u>
Total	247

FUEL AVAILABILITY - American anticipates no difficulty in obtaining fuel from its existing suppliers at Los Angeles and anticipates no difficulty in re-establishing its relationships at Haneda.

AIRCRAFT AVAILABILITY - American will use the 777-200 aircraft currently in its fleet. Service will initially be operated with the 247-seat configuration. In 2015, AA will continue to phase-in its new retrofitted 260-seat product, with the 45J, 55 Main Cabin Extra, and 160Y configuration. One first class seat is blocked from sale to conform with crew rest obligations.

American Airlines' Los Angeles Hub Connects 58 Airports to LAX



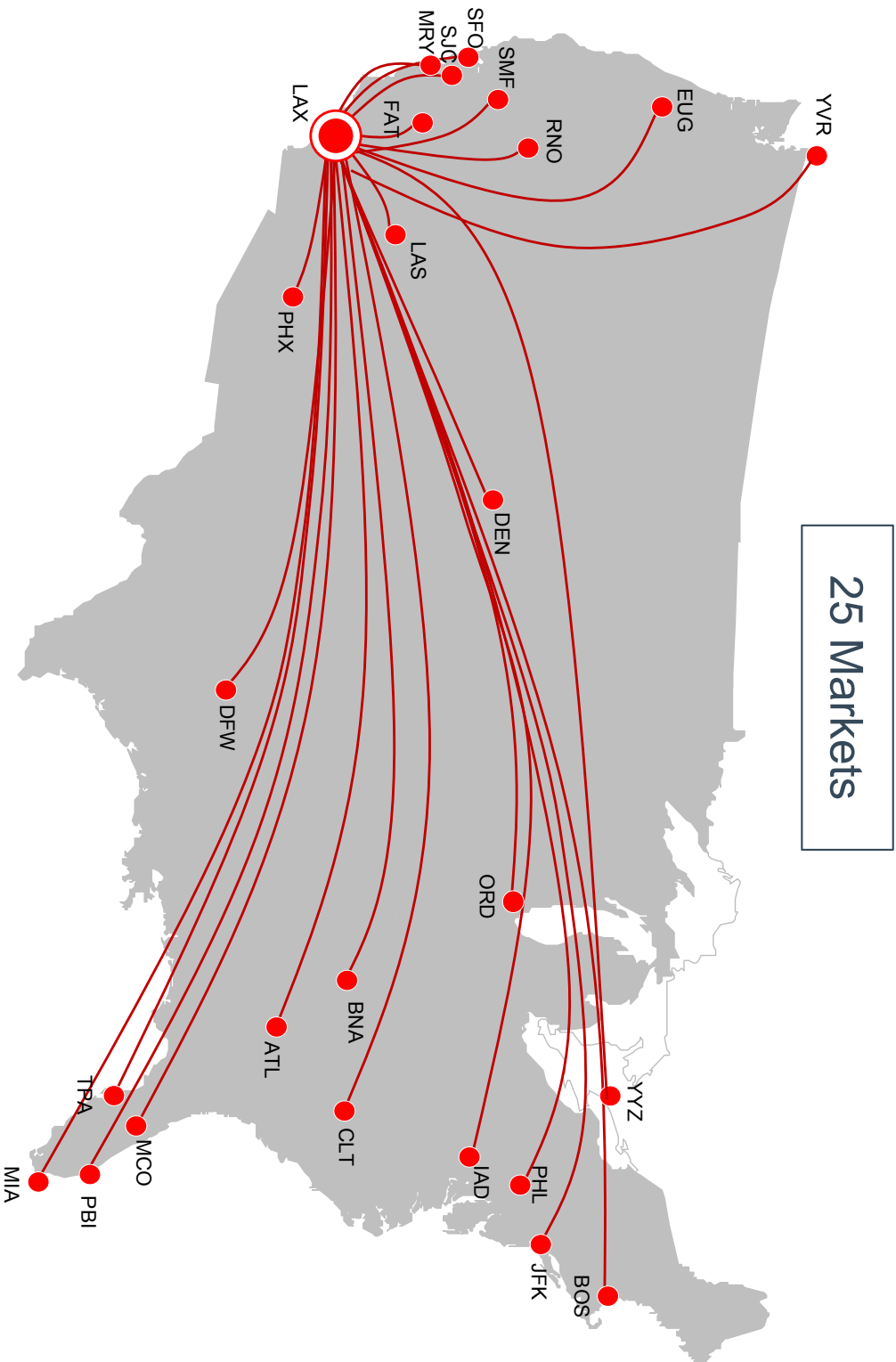
* Seasonal service; ** Service offered by Qantas; *** Service offered by Iberia Airlines

¹Atlanta service starts March 5, 2015

Source: American Airlines and OAG flight schedules

American's Proposed Los Angeles-Haneda Service Connecting Market

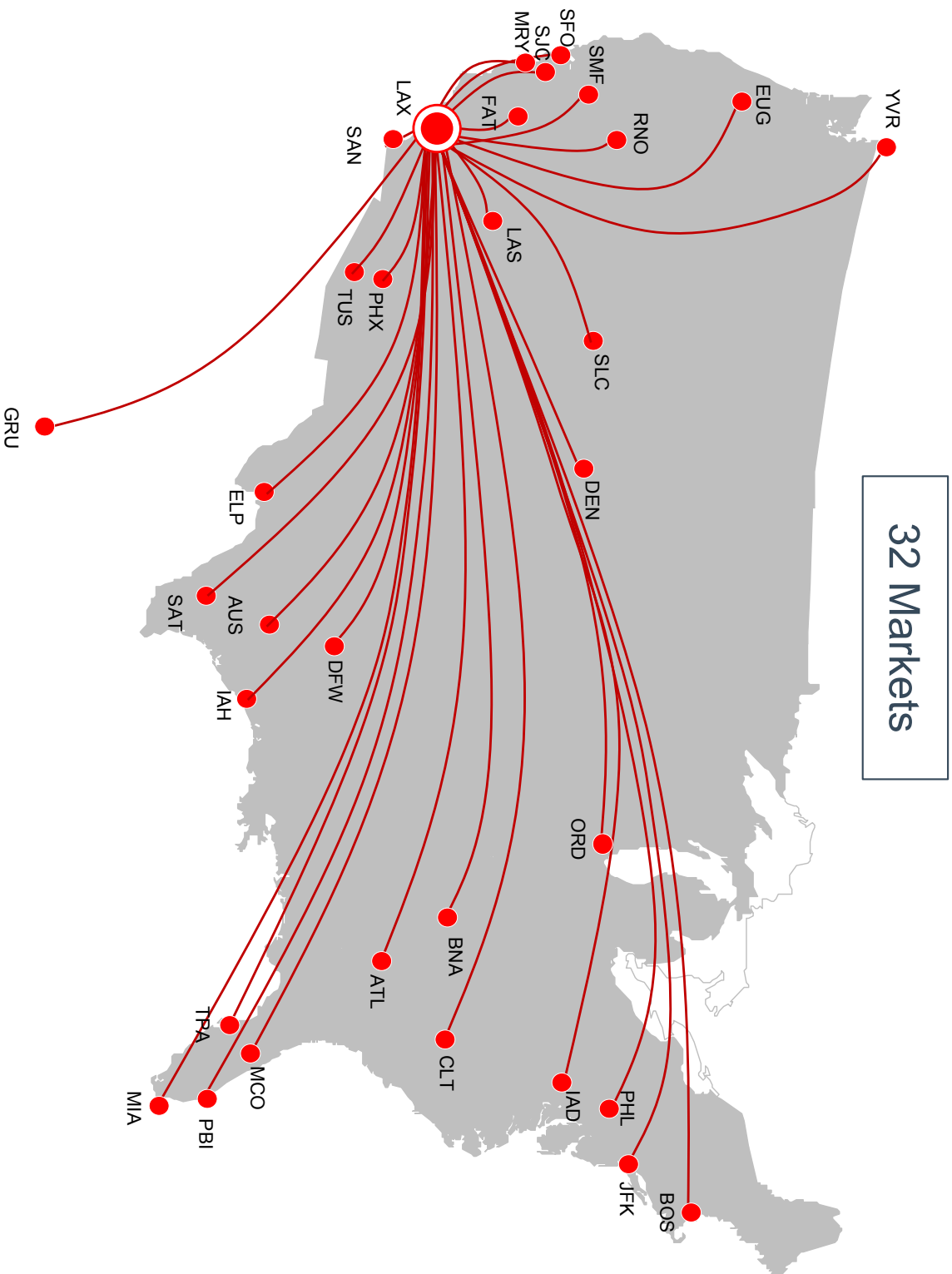
Summary for Markets Connecting in Both Directions – Summer Schedule



Note: Connecting details can be found at Exhibit AA-501.

Source: OAG flight schedules for August 15, 2015, as of December 24, 2014

American's Proposed Los Angeles-Haneda Service Connecting Market Summary for Markets Connecting in Both Directions – Winter Schedule



Note: Connecting details can be found at Exhibit AA-502

Source: OAG flight schedules for March 19, 2015, as of December 24, 2014

American Airlines' LAX-HND Cargo Capacity at 100% Load Factor

Haneda Monthly Cargo Capacity-Per Flight

at 100% Passenger Load Factor

<u>Equipment</u>	<u>Seats</u>	<u>Orig</u>	<u>Dest</u>	<u>Season</u>	<u>Month</u>	<u>Payload</u> <u>lbs</u>	<u>Pax Demand</u> <u>(%L/F)</u>	<u>Equivalent</u> <u>Pax Count</u>	<u>Pax & Bags</u> <u>Payload-lbs</u>	<u>Cargo Capability</u>
										<u>Based on Pax</u> <u>Demand</u>
B777-223ER	247	LAX	HND	Winter	Dec	101,800	100	247	59,280	42,520
					Jan	101,800	100	247	59,280	42,520
					Feb	101,800	100	247	59,280	42,520
				Spring	Mar	101,800	100	247	58,045	43,755
					Apr	101,800	100	247	58,045	43,755
					May	101,800	100	247	58,045	43,755
				Summer	Jun	101,800	100	247	58,045	43,755
					Jul	101,800	100	247	58,045	43,755
					Aug	101,800	100	247	58,045	43,755
				Fall	Sep	101,615	100	247	59,280	42,335
					Oct	101,615	100	247	59,280	42,335
Nov	101,615	100	247		59,280	42,335				
<u>Annual</u> <u>Average</u>					<u>101,754</u>	<u>100</u>	<u>247</u>	<u>58,663</u>	<u>43,091</u>	
B777-223ER	247	HND	LAX	Winter	Dec	101,800	100	247	59,280	42,520
					Jan	101,800	100	247	59,280	42,520
					Feb	101,800	100	247	59,280	42,520
				Spring	Mar	101,800	100	247	58,045	43,755
					Apr	101,800	100	247	58,045	43,755
					May	101,800	100	247	58,045	43,755
				Summer	Jun	101,800	100	247	58,045	43,755
					Jul	101,800	100	247	58,045	43,755
					Aug	101,800	100	247	58,045	43,755
				Fall	Sep	101,800	100	247	59,280	42,520
					Oct	101,800	100	247	59,280	42,520
Nov	101,800	100	247		59,280	42,520				
<u>Annual</u> <u>Average</u>					<u>101,800</u>	<u>100</u>	<u>247</u>	<u>58,663</u>	<u>43,138</u>	

Note: Cargo capacity of connecting flights can be found at Exhibit 503
 Source: American Airlines

American Airlines' LAX-HND Cargo Capacity at 80% Load Factor

Haneda Monthly Cargo Capacity-Per Flight at 80% Passenger Load Factor

Equipment	Seats	Orig	Dest	Season	Month	Payload lbs	Pax Demand (%LF)	Equivalent Pax Count	Pax & Bags Payload:lbs	Cargo Capability
										Based on Pax Demand
B777-223ER	247	LAX	HND	Winter	Dec	101,800	80	198	47,424	54,376
					Jan	101,800	80	198	47,424	54,376
					Feb	101,800	80	198	47,424	54,376
				Spring	Mar	101,800	80	198	46,436	55,364
					Apr	101,800	80	198	46,436	55,364
					May	101,800	80	198	46,436	55,364
				Summer	Jun	101,800	80	198	46,436	55,364
					Jul	101,800	80	198	46,436	55,364
					Aug	101,800	80	198	46,436	55,364
				Fall	Sep	101,615	80	198	47,424	54,191
					Oct	101,615	80	198	47,424	54,191
					Nov	101,615	80	198	47,424	54,191
Annual Average					101,754	80	198	46,930	54,824	
B777-223ER	247	HND	LAX	Winter	Dec	101,800	80	198	47,424	54,376
					Jan	101,800	80	198	47,424	54,376
					Feb	101,800	80	198	47,424	54,376
				Spring	Mar	101,800	80	198	46,436	55,364
					Apr	101,800	80	198	46,436	55,364
					May	101,800	80	198	46,436	55,364
				Summer	Jun	101,800	80	198	46,436	55,364
					Jul	101,800	80	198	46,436	55,364
					Aug	101,800	80	198	46,436	55,364
				Fall	Sep	101,800	80	198	47,424	54,376
					Oct	101,800	80	198	47,424	54,376
					Nov	101,800	80	198	47,424	54,376
Annual Average					101,800	80	198	46,930	54,870	

Note: Cargo capacity of connecting flights can be found at Exhibit 504
 Source: American Airlines

**Series 200:
American's Proposed Los Angeles-Haneda
Service is Superior to Delta's Sporadic Use
of the Haneda Slot Pair on Seattle-Haneda**

NARRATIVE TO THE 200 SERIES OF EXHIBITS

The 200 Series of Exhibits details why American's proposed Los Angeles-Haneda service maximizes the public benefits of the Haneda slot pair under review in this proceeding, and why the Department should allocate that slot pair to American. The 200 Series of Exhibits focuses broadly on the relative size of the Los Angeles-Tokyo market and, more specifically, on the Los Angeles-Haneda market. Additionally, the Exhibits demonstrate why Los Angeles merits first-ever American and first-ever **oneworld** service to Haneda. Exhibits AA-201 and AA-203 highlight that Los Angeles is the largest continental U.S. market to Tokyo. Exhibit AA-210 demonstrates that the Los Angeles-Tokyo market is underserved compared to the Seattle-Tokyo market.

Exhibits AA-202, 204, 205 and 206 provide direct comparisons of the broader Los Angeles-Tokyo market with the Seattle-Tokyo market, as well as the Los Angeles-Haneda market with the Seattle-Haneda market. Exhibit AA-206 demonstrates that the Los Angeles-Haneda market is approximately five times the size of the Seattle-Haneda market. Exhibits AA-211, 212, and 213 indicate that Los Angeles-Haneda is underserved in terms of seats relative to Seattle-Haneda. These exhibits also demonstrate that Los Angeles is seat deficit relative to Seattle, given the significantly larger Los Angeles-Tokyo O&D demand than Seattle-Tokyo. Exhibit AA-213 also shows that American would offer the most seats of any carrier flying between Los Angeles and Haneda, and would offer more premium seats than Delta.

Exhibits AA-207 and 208 depict that American is the only U.S. carrier serving Japan that does not have access to Haneda. Exhibit AA-208 similarly illustrates that **oneworld** is the only alliance without Los Angeles-Haneda service, and that an additional alliance entrant would provide much needed competition to the SkyTeam and Star alliances' Haneda services at Los Angeles – the largest Tokyo O&D market in the continental United States.

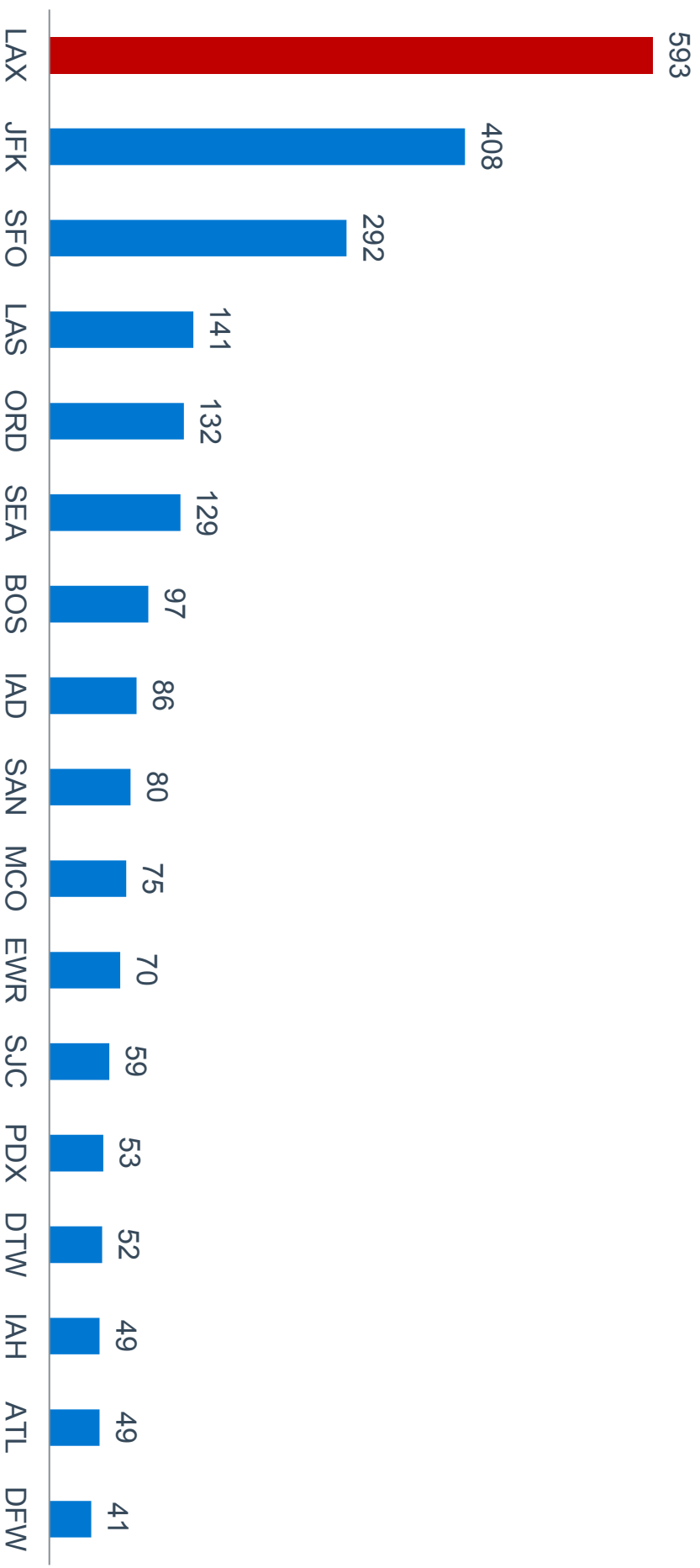
Exhibit AA-214 demonstrates that American's Los Angeles-Haneda service will connect more unique U.S. behind-gateway cities than Delta's existing Seattle-Haneda service. A corollary exhibit, AA-215, shows how American's Los Angeles-Haneda service will generate over 210,000 more O&D passengers than Delta's current Seattle connecting markets. Exhibit AA-216 illustrates that American's Los Angeles-Haneda flight will serve nearly 2.5 times as many unique connecting markets as Hawaiian's Honolulu-Haneda service. Exhibit AA-217 shows that American's Los Angeles-Haneda connecting markets will generate 324,000 more O&D passengers than Hawaiian's Haneda connecting markets. Exhibit AA-218 illustrates that American will serve 20 percent more unique connecting markets than Delta's existing Los Angeles-Haneda service. Exhibit AA-219 shows American's Los Angeles connecting markets will generate over 256,000 O&D passengers. Exhibits AA-220 shows that American's Los Angeles-Haneda service will serve six times more unique connecting markets than ANA's Los Angeles-Haneda Service, and exhibit AA-221 shows that American will generate almost one million more O&D passengers than ANA's Los Angeles-Narita connecting markets.

Exhibit AA-222 completes the description of American's Los Angeles-Haneda service proposal, and shows that American will offer more cargo capacity for shippers than Delta on the Los Angeles-Haneda route and almost 20 million more pounds of cargo capacity annually than Delta's Seattle and Los Angeles services to Haneda.

The conclusion of this 200 Series of Exhibits is that Los Angeles clearly has substantial unmet demand today for an additional Haneda service and that, by allocating to American the indisputably underutilized slot pair currently used by Delta for Seattle-Haneda, the Department can remedy American's and **oneworld's** conspicuous absence from the Los Angeles-Haneda market; can increase competition significantly; and, can ensure the maximization of the public benefits of this scarce resource.

Los Angeles Is, By Far, the Largest Continental U.S. Market to Tokyo – Twice as Large as the Next Largest Market with Haneda Service (SFO) and 4.6 Times the Size of Seattle

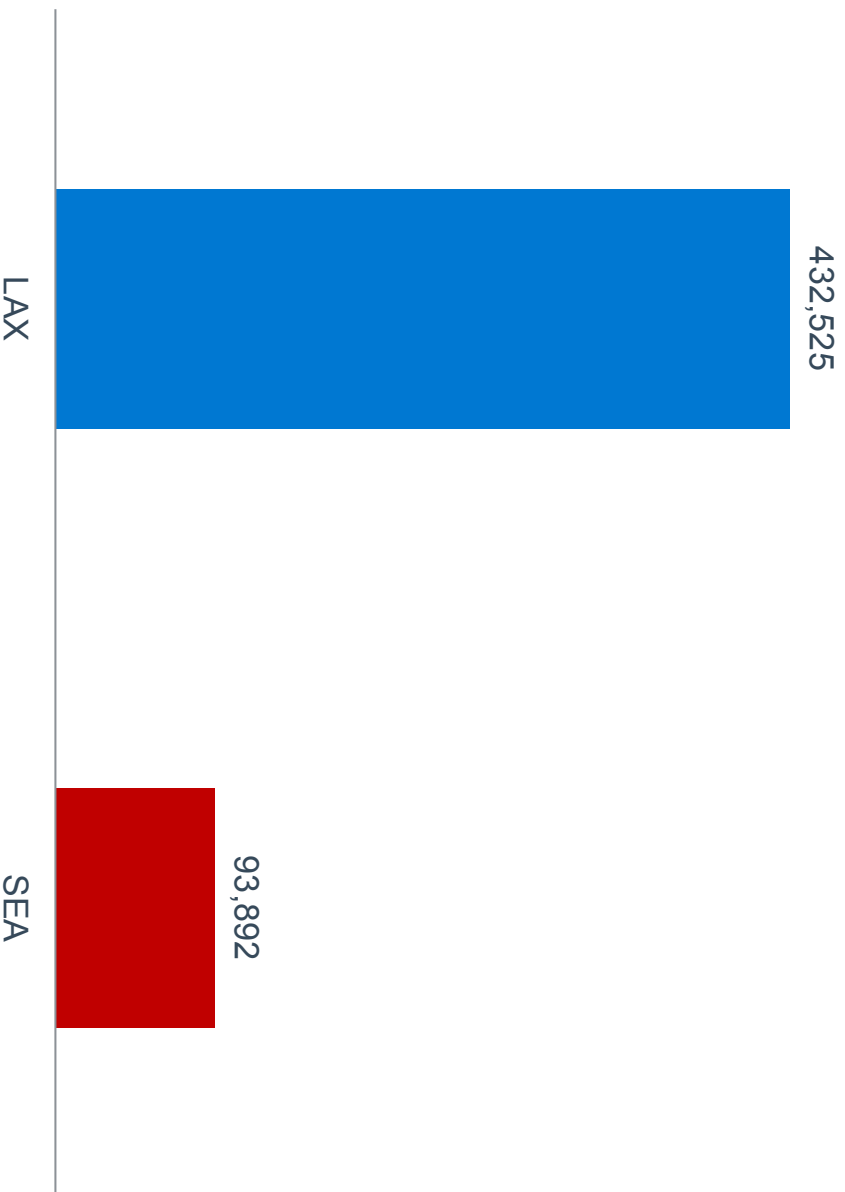
Continental U.S. PPDEW to Tokyo (NRT/HND)
Year Ending November 2014



Source: O&D passengers, MIDT YE November 2014

Los Angeles Has Almost 340,000 More Annual O&D Passengers to Tokyo Than Seattle

Annual O&D Passengers to Tokyo (NRT/HND)
Year Ending November 2014



Source: O&D passengers, MIDT YE November 2014

Los Angeles Is, By Far, the Largest Continental U.S. Market to Haneda

Continental U.S. PPDEW to Haneda Year Ending November 2014

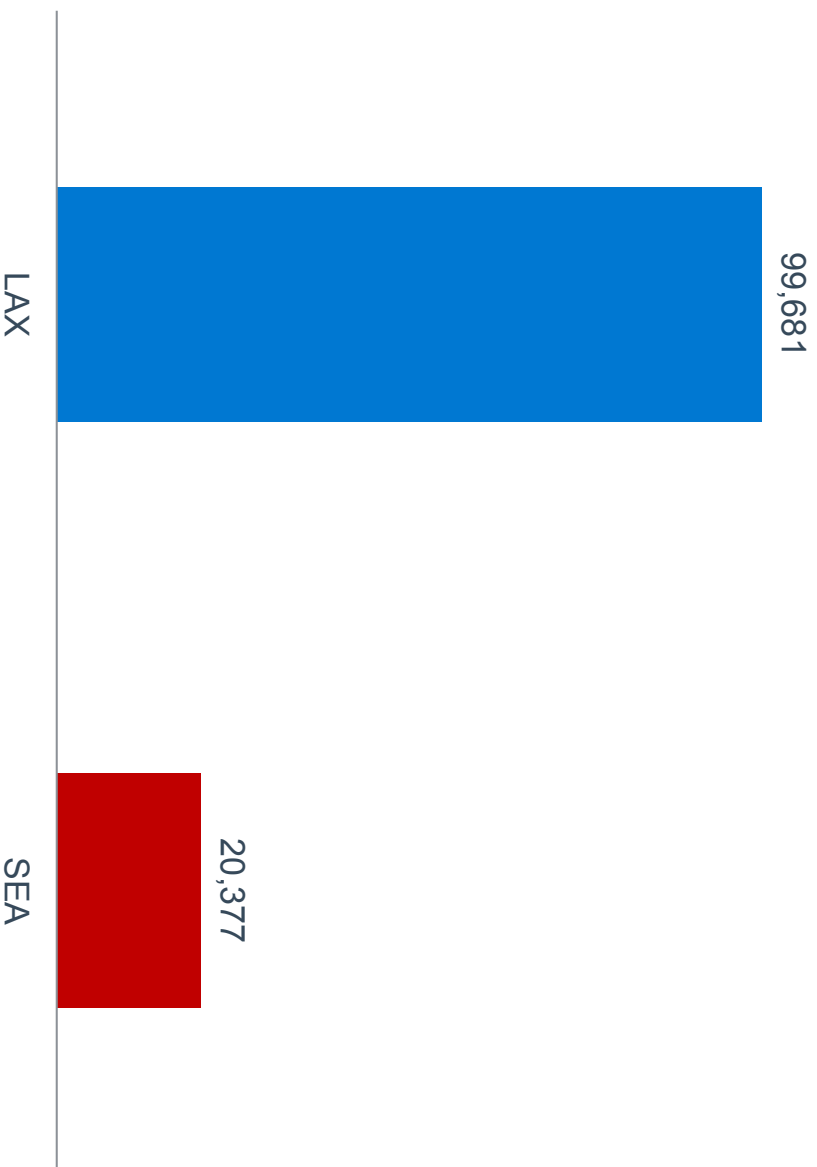


Source: O&D passengers, MIDT YE November 2014

[#LetAFlyHaneda](#)

Los Angeles Has Almost 80,000 More Annual O&D Passengers to Haneda Than Seattle

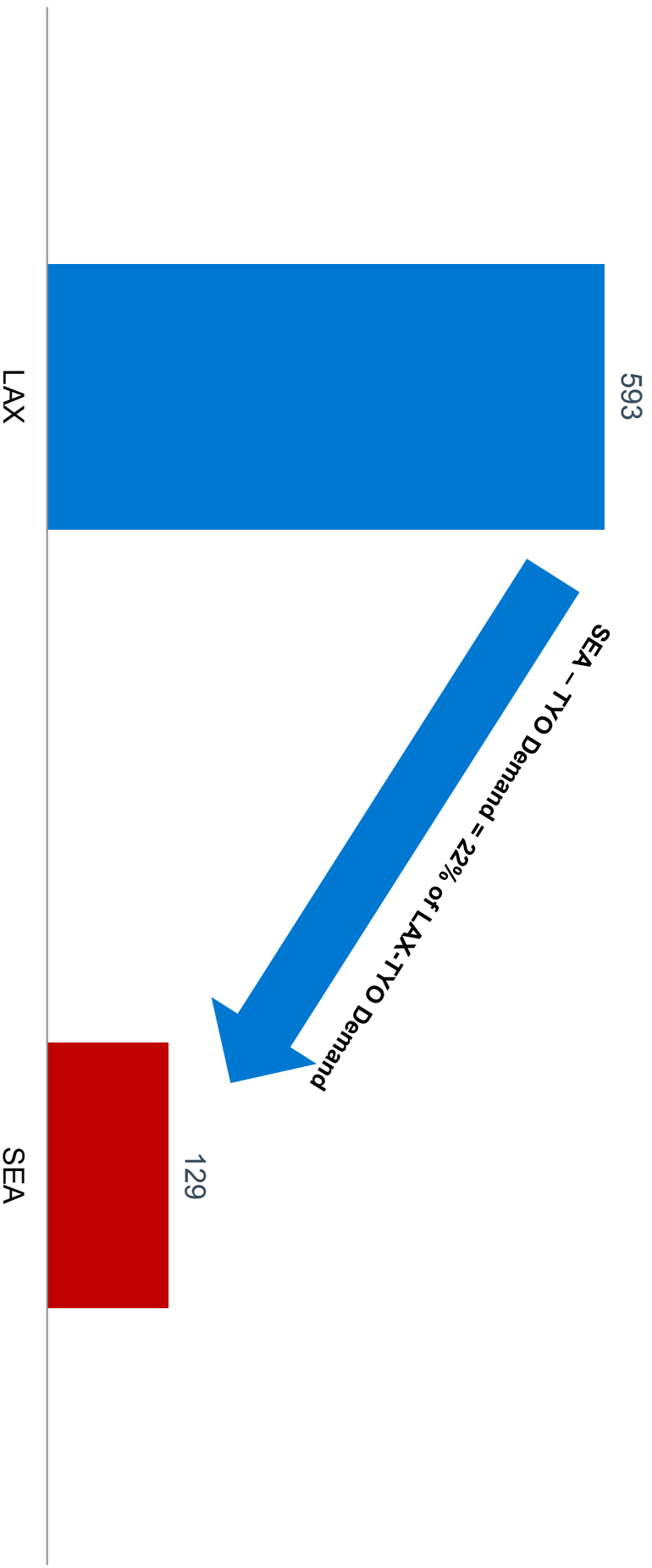
Annual O&D Passengers to Haneda Year Ending November 2014



Source: O&D passengers, MIDT YE November 2014

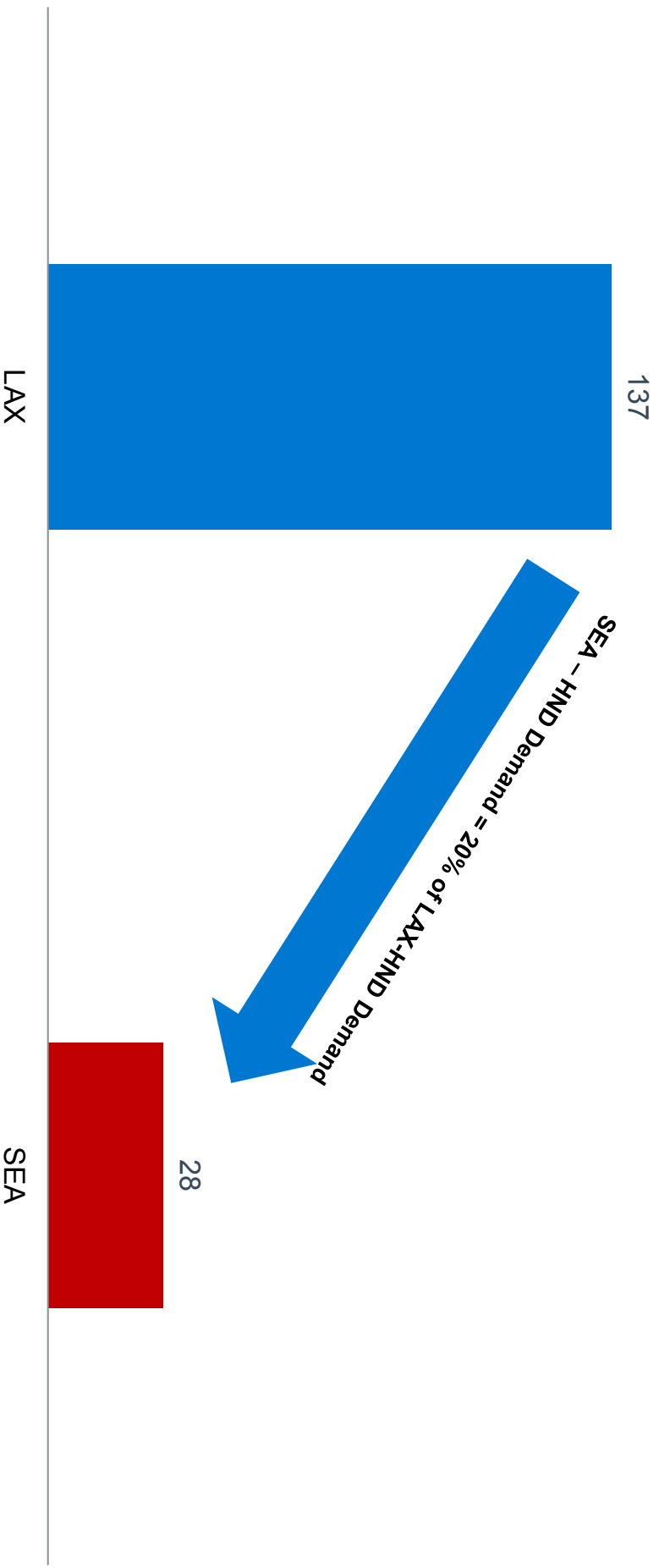
Los Angeles--Tokyo Demand Is 4.6 Times the Demand of Seattle-Tokyo

PPDEW to Tokyo (NRT/HND)
Year Ending November 2014



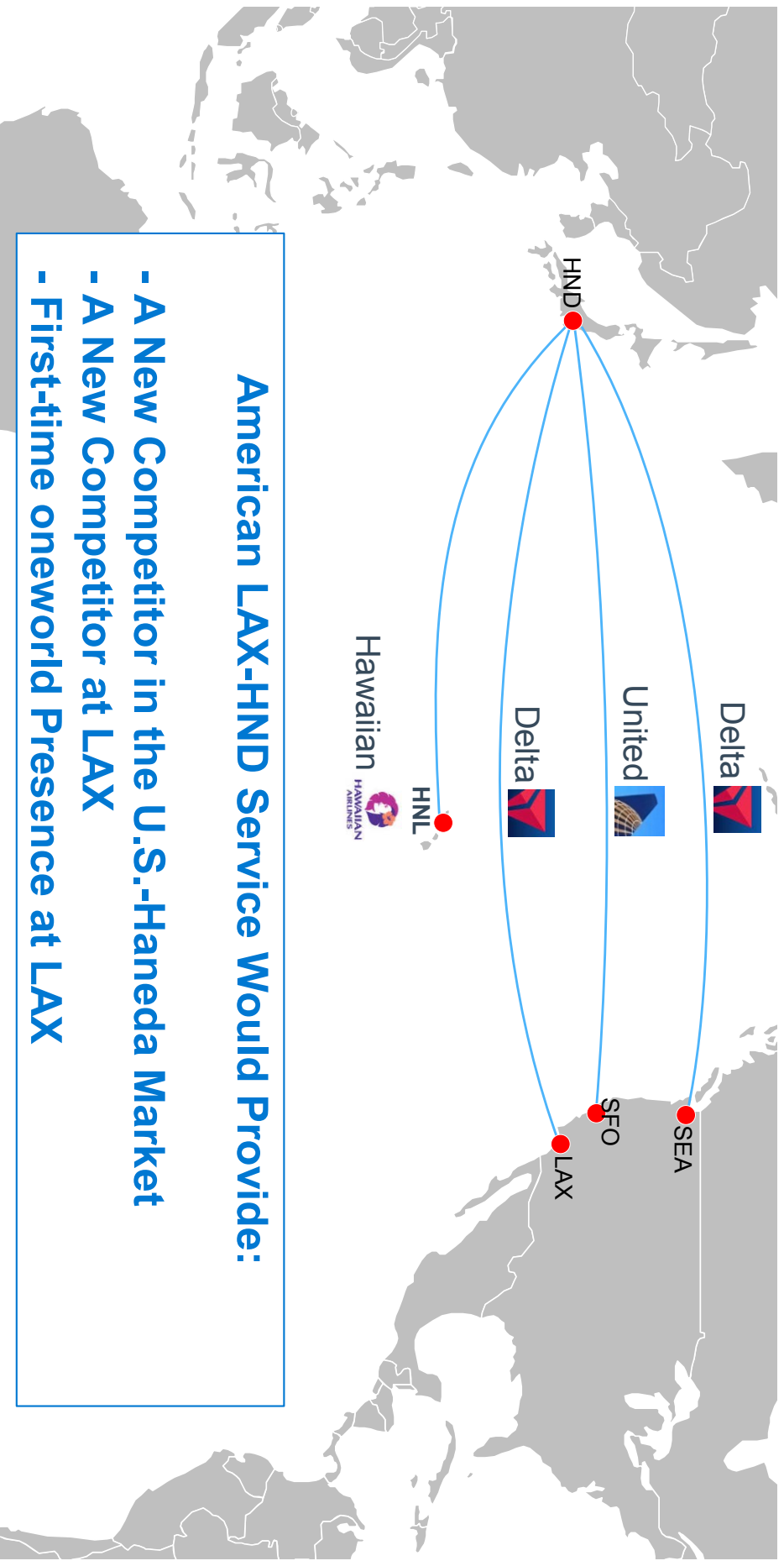
Los Angeles-Haneda Demand Is 4.9 Times the Demand of Seattle-Haneda

PPDEW to Haneda
Year Ending November 2014



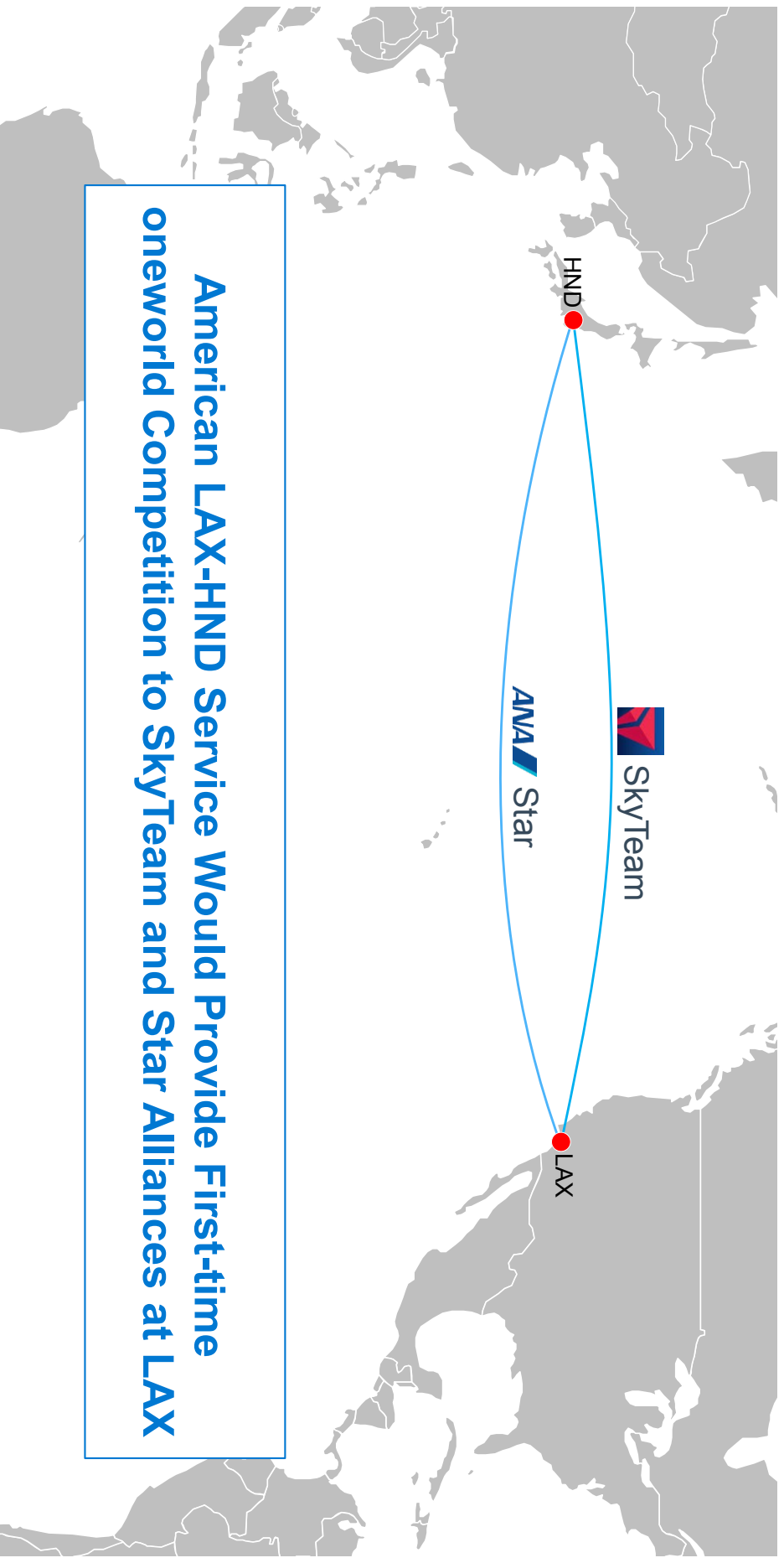
American Is the Only U.S. Airline Serving Japan That Does Not Have Access to Haneda

U.S. Airline Routes to Haneda



Oneworld Is the Only Alliance Without LAX Access to Haneda

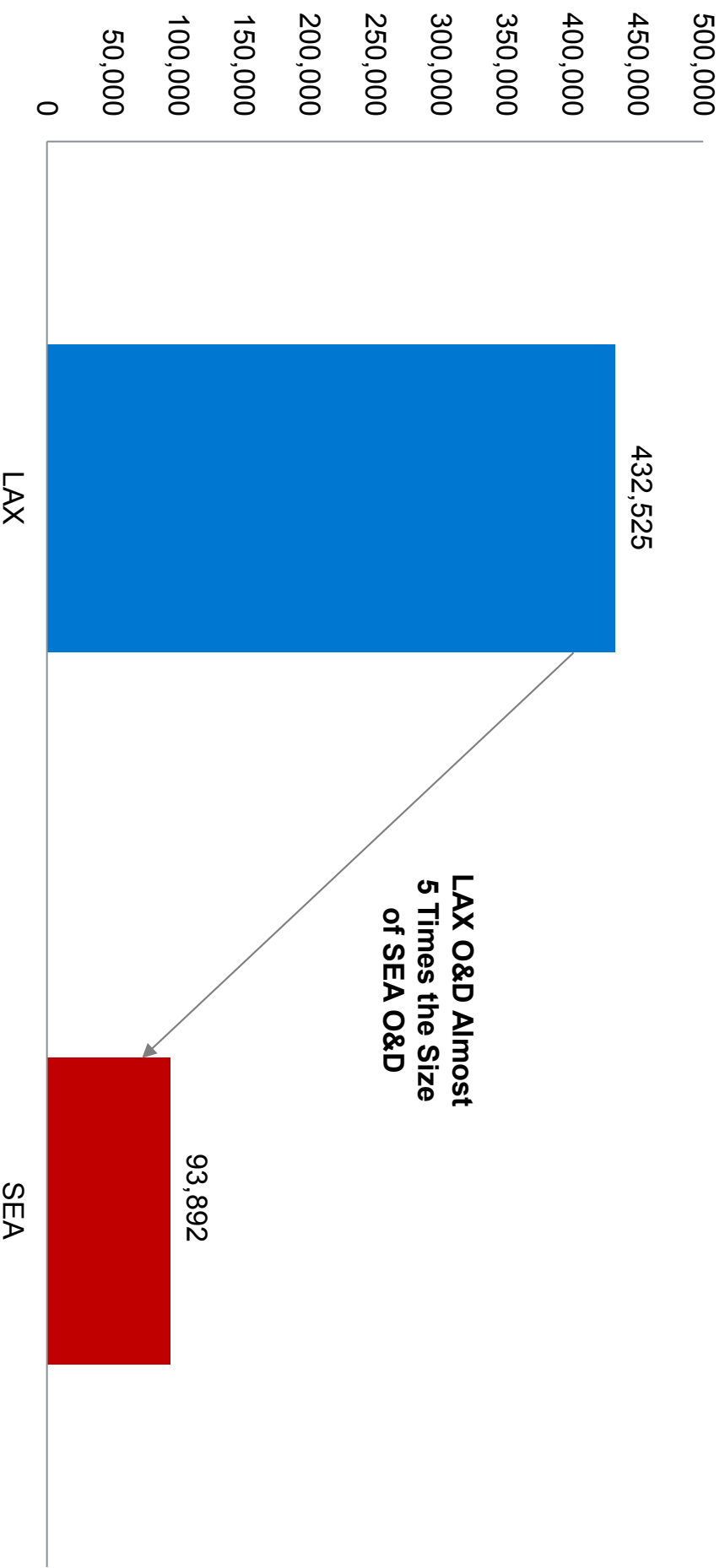
U.S. And Japanese Airline LAX-Haneda Routes



American LAX-HND Service Would Provide First-time oneworld Competition to SkyTeam and Star Alliances at LAX

Los Angeles' Tokyo O&D Is Almost Five Times The Size of Seattle's O&D – Almost 340,000 More Passengers

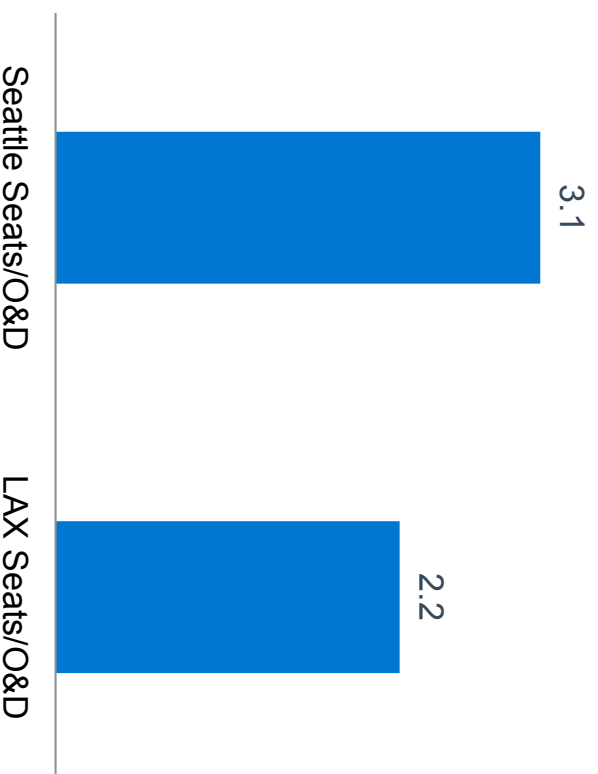
Continental U.S.–Tokyo Annual Passengers
YE November 2014



Source: MIDT YE November 2014

LAX-Tokyo Is Underserved Relative to SEA-Tokyo: SEA Has 37% More Seats per O&D Tokyo Passenger Than Los Angeles

Departing Seats per Tokyo O&D Passenger
 Year Ending June 2014

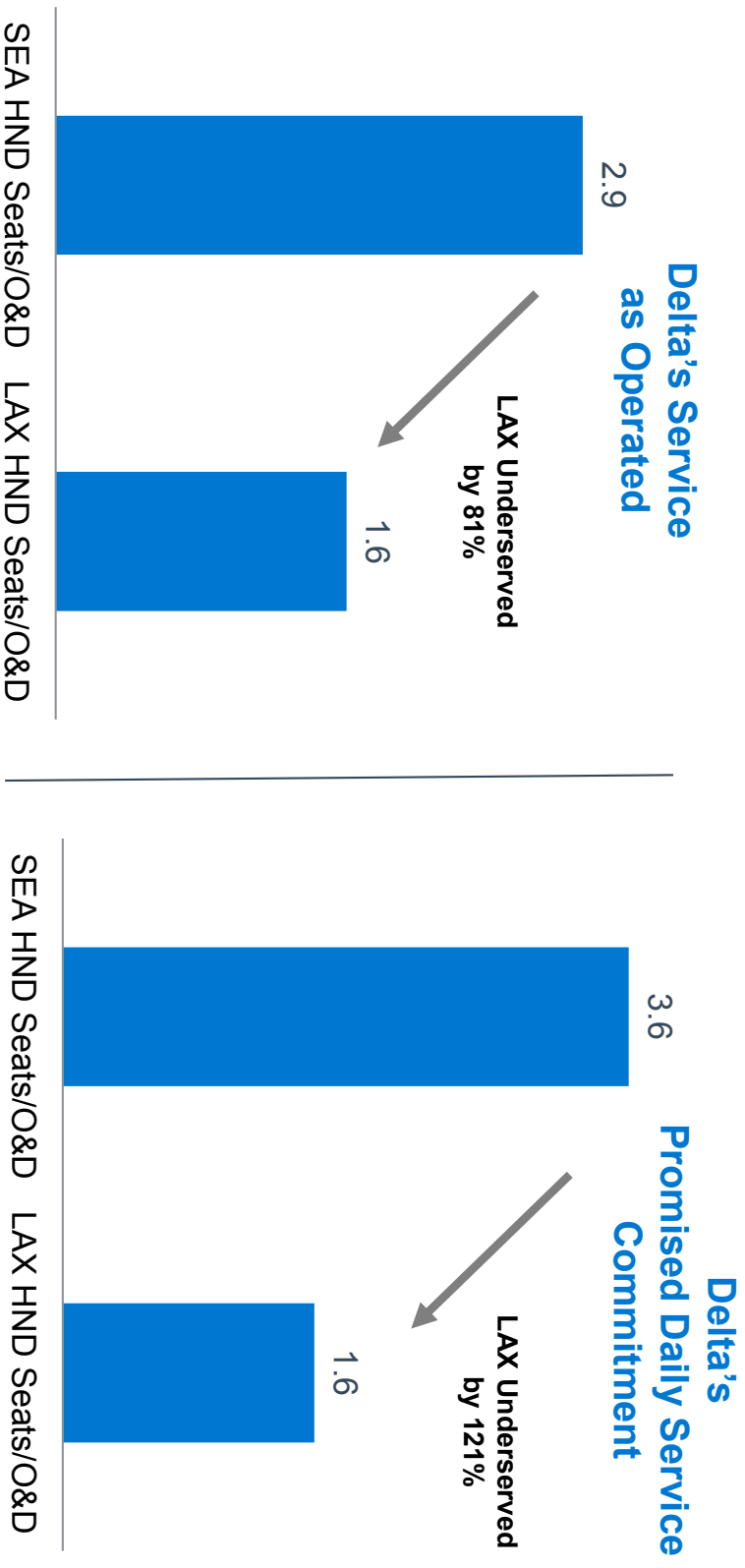


Departing Seats	296,559	965,633
O&D Passengers to/from Tokyo	96,634	432,334
Departing Seats/O&D Pax	3.1	2.2
Difference		37%

Note: YE June 2014 used as reference period because Delta operated with more regular frequency during that period. If Delta SEA-HND were assumed to operate daily, that would further increase the over-service gap between SEA and LAX in terms of seats per O&D passenger.
 Source: MIDT and OAG flight schedules

LAX-Haneda Is Underserved Relative to SEA-Haneda Under Any Measure

Departing Seats per Haneda O&D Passenger
 Year Ending June 2014



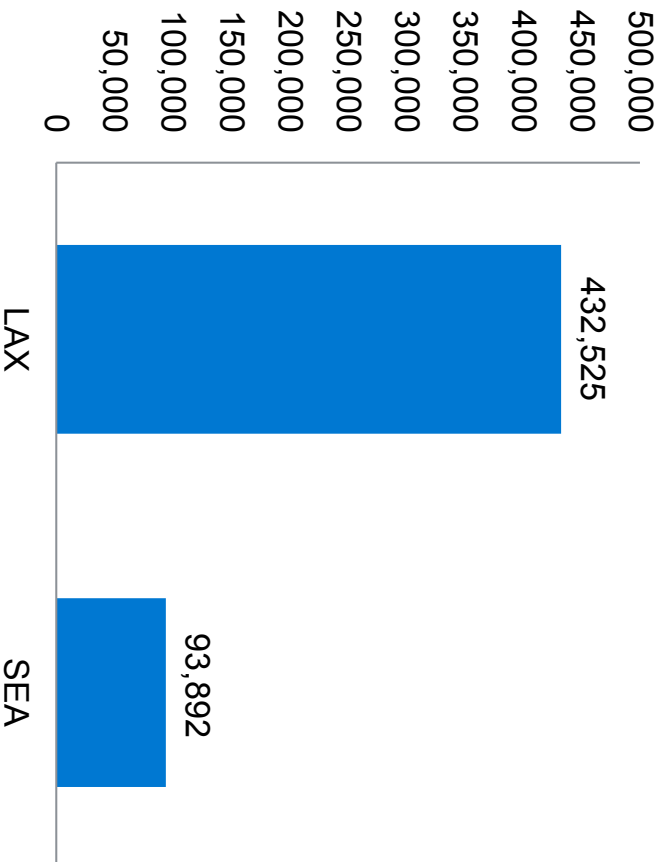
Departing Seats	62,841	165,118	77,015	165,118
HND O&D Pax	21,401	101,598	21,401	101,598
Departing Seats/O&D	2.9	1.6	3.6	1.6
Difference		81%		121%

Note: Assumes Delta operated daily SEA-HND 767 flight with 211 seats during the year ending June 2014.
 Source: MIDT and OAG flight schedules

The Los Angeles Market Needs More Flights Than Seattle to Accommodate Unfulfilled Demand

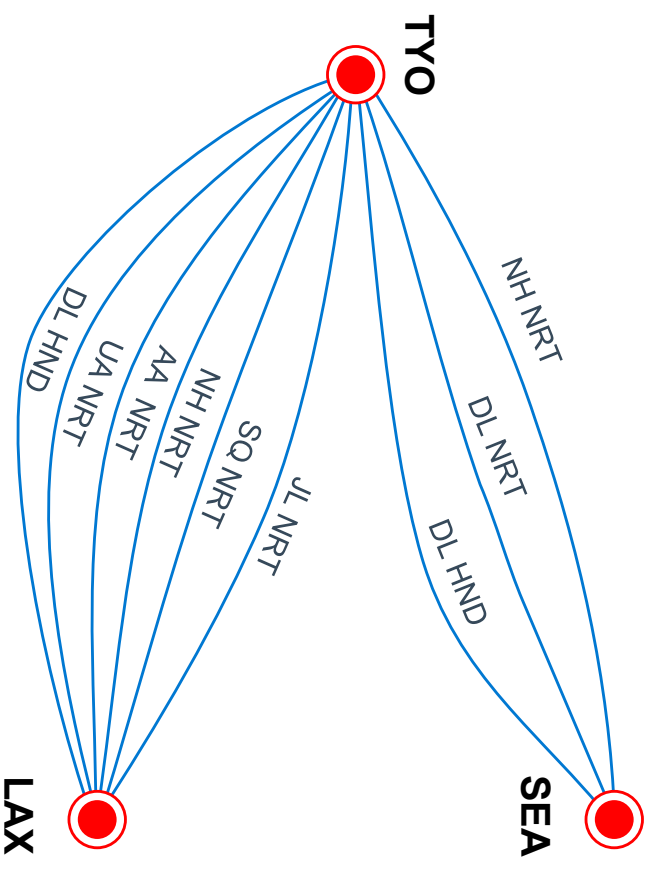
Continental U.S.-Tokyo Annual Passengers
YE November 2014

Los Angeles O&D Is Almost 5X Larger Than Seattle's



LAX 5X Seattle

Los Angeles only has 2X the number of Tokyo flights as Seattle ...yet



LAX 2X Seattle

American Will Be Able to Fill the Unmet Demand at LAX by Operating the Most Seats on LAX-HND . . . and More Premium Seats Than Delta

American Airlines 777-200

Cabin Class	Seats	Retrofitted
First Class	16	--
Business Class	37	45
Economy Class	194	55/160
Total	247	260 *



Delta Air Lines 767-300

Cabin Class	Seats
First Class	0
Business Class	36
Economy Class	172
Total	208



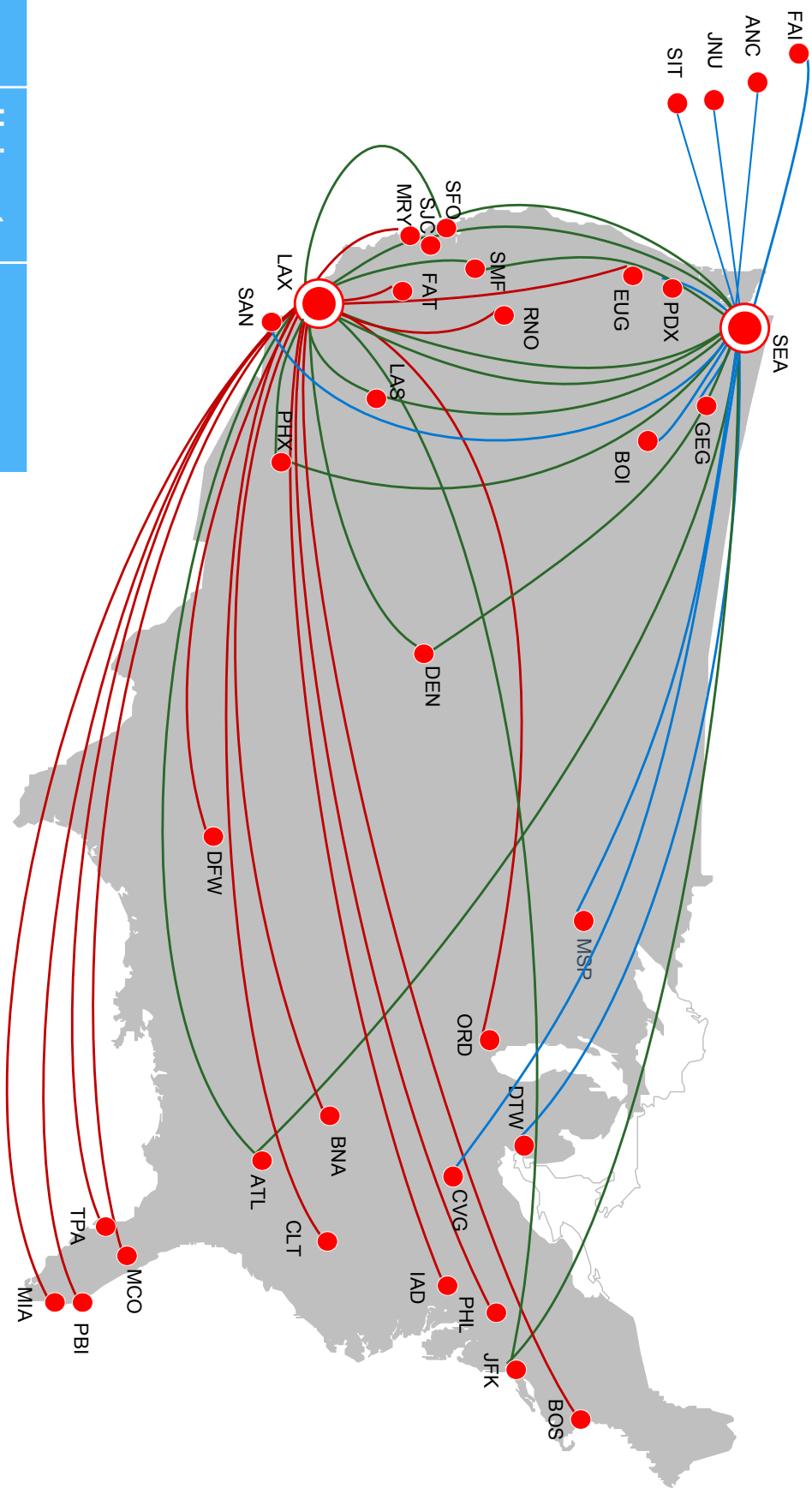
All Nippon 777-200

Cabin Class	Seats
First Class	0
Business Class	70
Economy Class	153
Total	223



* Service will initially be operated with the 247-seat configuration. In 2015, American will continue to phase-in its new retrofitted 260-seat product, with the 45J, 55 Main Cabin Extra, and 160Y configuration. One first class seat is blocked from sale to conform with crew rest obligations.

American's LAX-HND Service Will Serve More Unique U.S. Connecting Markets Than Delta's Existing SEA-HND Service



Overlap	Unique to AA LAX-HND	Unique to DL SEA-HND
9	15	11

— Overlap
 — Unique to AA LAX-HND
 — Unique to DL SEA-HND

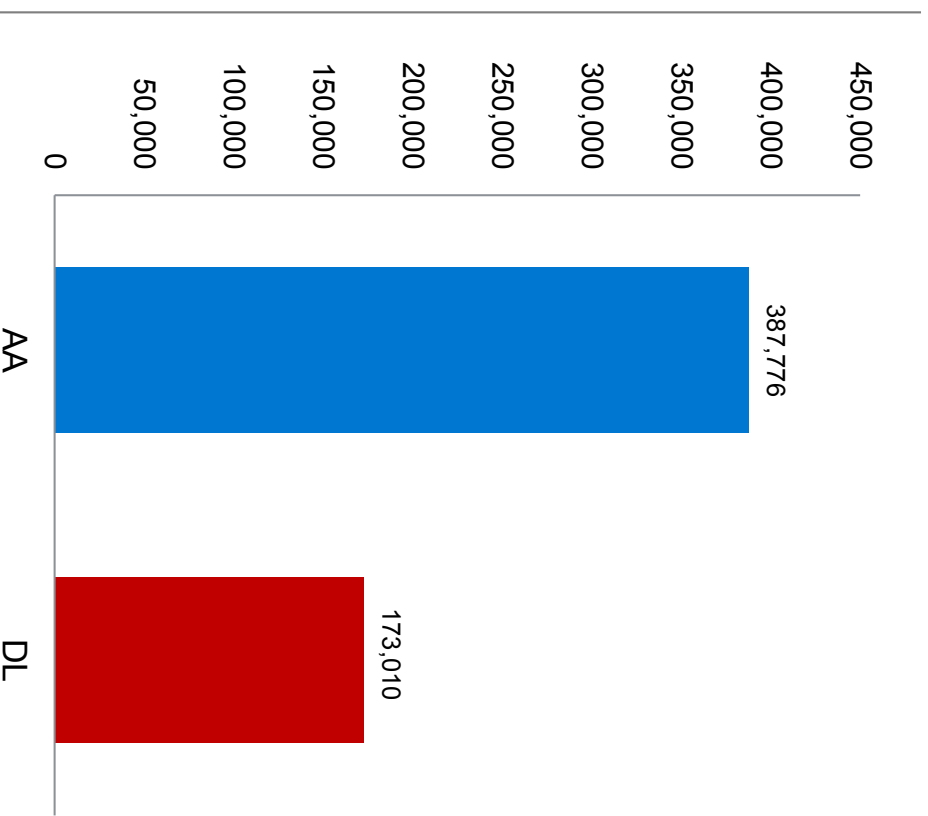
Markets connecting in BOTH directions

Source: OAG flight schedules, August 2015. LAX is considered an overlapping market.

American's LAX-HND Connecting Markets Generate Over 210,000 More O&D Passengers Than Delta's SEA Connecting Markets

AA/DL Unique Connecting Markets and Tokyo O&D Passengers Year Ending November 2014

Unique AA LAX-HND	Tokyo O&D	Unique DL SEA-HND	Tokyo O&D
Boston	71,029	Anchorage	3,796
Charlotte	6,424	Boise	4,964
Chicago - ORD	96,506	Cincinnati	7,446
Dallas-Ft. Worth	30,003	Detroit	37,887
Eugene	1,168	Fairbanks	2,482
Fresno	1,095	Juneau	146
Miami	17,739	Minneapolis-St. Paul	17,739
Monterey, CA	365	Portland, OR	38,617
Nashville	14,454	San Diego	58,254
Orlando	55,042	Sitka	0
Philadelphia	11,169	Spokane	1,679
Reno	1,679		
Tampa	6,497		
Washington - IAD	73,219		
West Palm Beach	1,387		
Total	387,776		173,010



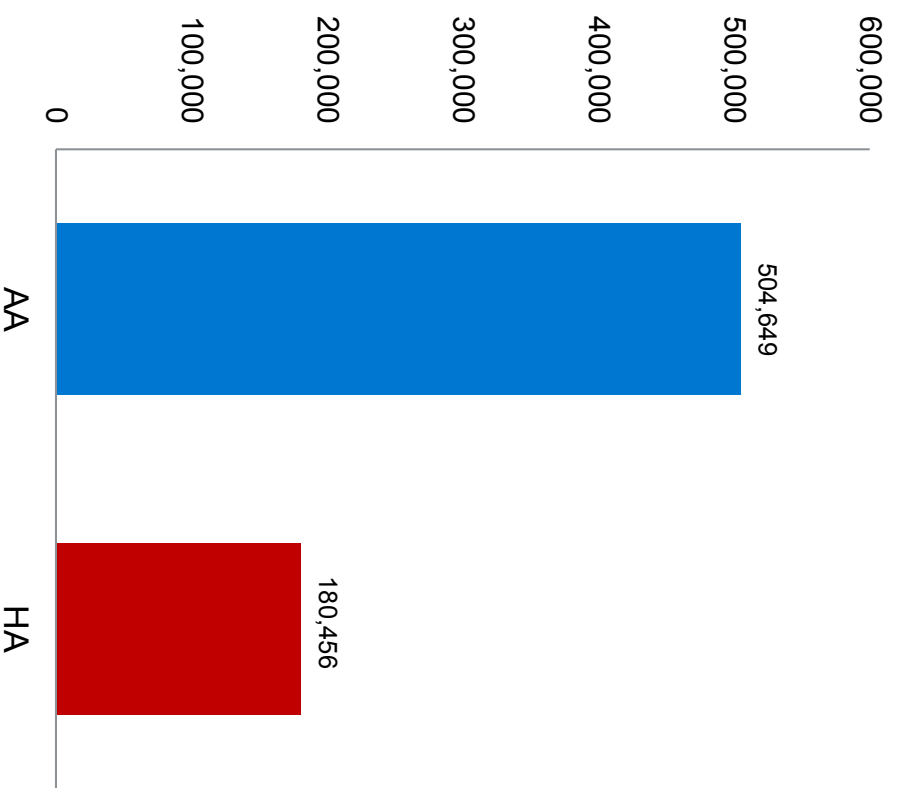
Markets connecting in BOTH directions

Source: O&D passengers, MIDT YE November 2014. Washington includes IAD and DCA.

American's LAX-HND Connecting Markets Generate 324,000 More O&D Passengers Than Hawaiian's HNL Connecting Markets

AA/HNA Unique Connecting Markets and Tokyo O&D Passengers Year Ending November 2014

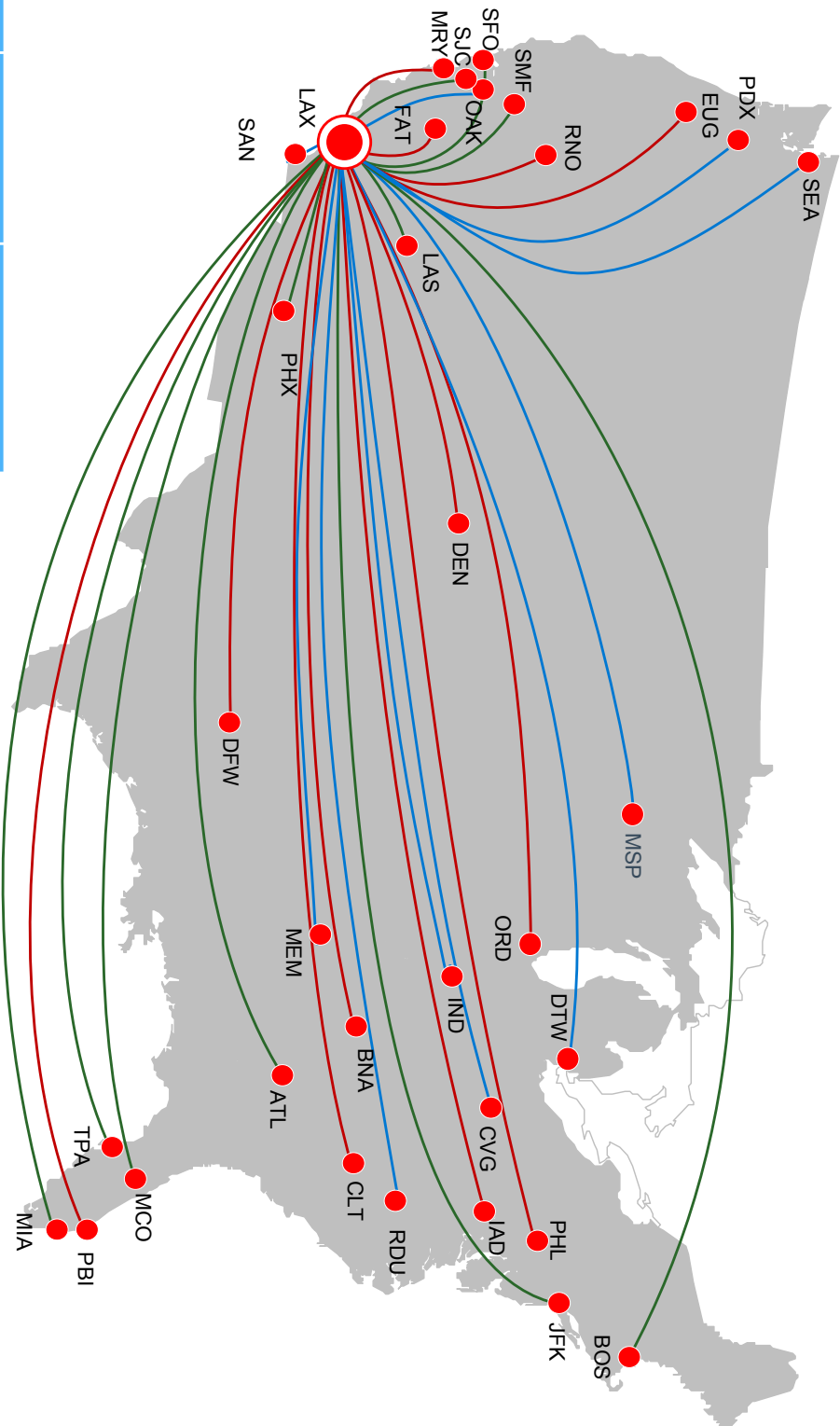
Unique AA LAX-HND	Tokyo O&D	Unique HA HNL-HND	Tokyo O&D
Atlanta	35,989 Hilo		4,818
Boston	71,029 Kona		57,305
Charlotte	6,424 Lanai		219
Chicago – ORD	96,506 Lihue		4,453
Dallas-Ft. Worth	30,003 Maui		16,790
Denver	20,294 Molokai		-
Eugene	1,168 Portland		38,617
Fresno	1,095 San Diego		58,254
Miami	17,739		
Monterey, CA	365		
Nashville	14,454		
Orlando	55,042		
Philadelphia	11,169		
Phoenix	17,520		
Reno	1,679		
San Jose, CA	43,070		
Tampa	6,497		
Washington - IAD	73,219		
West Palm Beach	1,387		
Total	504,649		180,456



Markets connecting in BOTH directions

Source: O&D passengers, MIDT YE November 2014, and OAG flight schedules. Washington includes IAD and DCA.

American's Proposed LAX-HND Service Will Serve 20% More Unique U.S. Connecting Markets Than Delta's Existing LAX-HND Service



Overlap	Unique to AA LAX-HND	Unique to DL LAX-HND
11	12	10

Markets connecting in BOTH directions

Source: OAG flight schedules, August 2015.

— Overlap
 — Unique to AA LAX-HND
 — Unique to DL LAX-HND

American's LAX Connecting Markets Generate Over 256,000 O&D Passengers

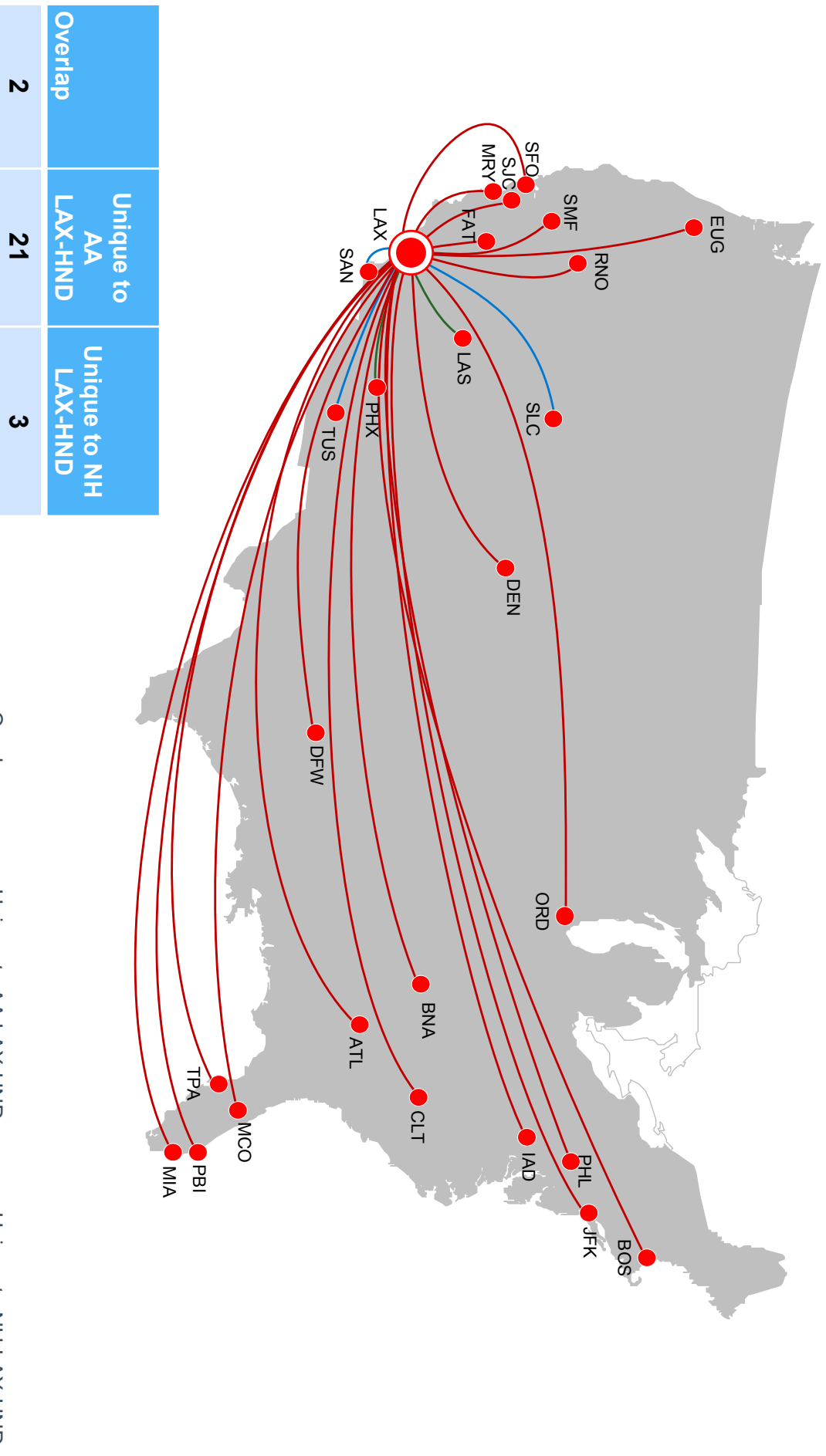
AA Unique Connecting Markets and Tokyo O&D Passengers

Unique AA LAX-HND	Tokyo O&D
Charlotte	6,424
Chicago - ORD	96,506
Dallas-Ft. Worth	30,003
Denver	20,294
Eugene	1,168
Fresno	1,095
Monterey, CA	365
Nashville	14,454
Philadelphia	11,169
Reno	1,679
Washington – IAD	73,219
West Palm Beach	1,387
Total	256,376

Markets connecting in BOTH directions

Source: O&D passengers, MIDT YE November 2014. Washington MIDT includes IAD and DCA.

American's LAX-HND Service Will Serve 6 Times More Unique Connecting Markets Than ANA's Existing LAX-HND Service



Markets connecting in BOTH directions, connecting markets for NH are operated by UA
 Source: OAG flight Schedules

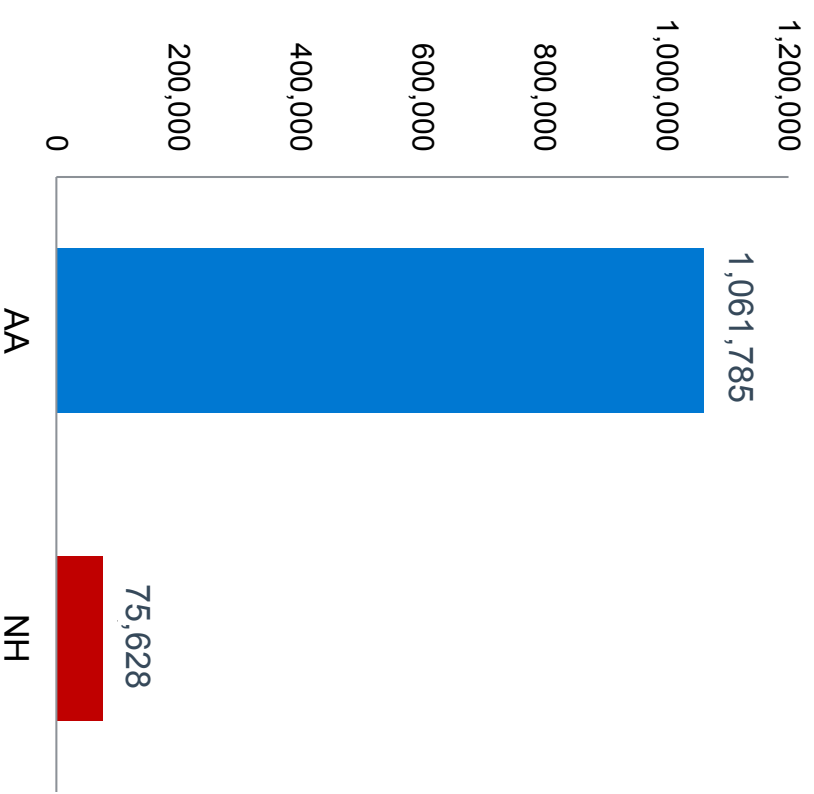
#LetAAFlyHaneda

American's LAX-HND Connecting Markets Generate Almost One Million More O&D Passengers Than ANA's LAX-NRT Connecting Markets

AA/NH (UA*) Unique Connecting Markets and Tokyo O&D Passengers

Year Ending November 2014

Unique AA LAX-HND	Tokyo O&D	Unique NH LAX-NRT	Tokyo O&D
Atlanta	35,989	Salt Lake City	14,308
Boston	71,029	San Diego	58,254
Charlotte	6,424	Tucson	3,066
Chicago- O'Hare	96,506		
Dallas/Ft. Worth	30,003		
Denver	20,294		
Eugene	1,168		
Fresno	1,095		
Miami	17,739		
Monterey, CA	365		
Nashville	14,454		
New York Kennedy	358,649		
Orlando	55,042		
Philadelphia	11,169		
Reno	1,679		
Sacramento	3,066		
San Francisco	212,941		
San Jose , CA	43,070		
Tampa	6,497		
Washington-IAD	73,219		
West Palm Beach	1,387		
Total	1,061,785		75,628

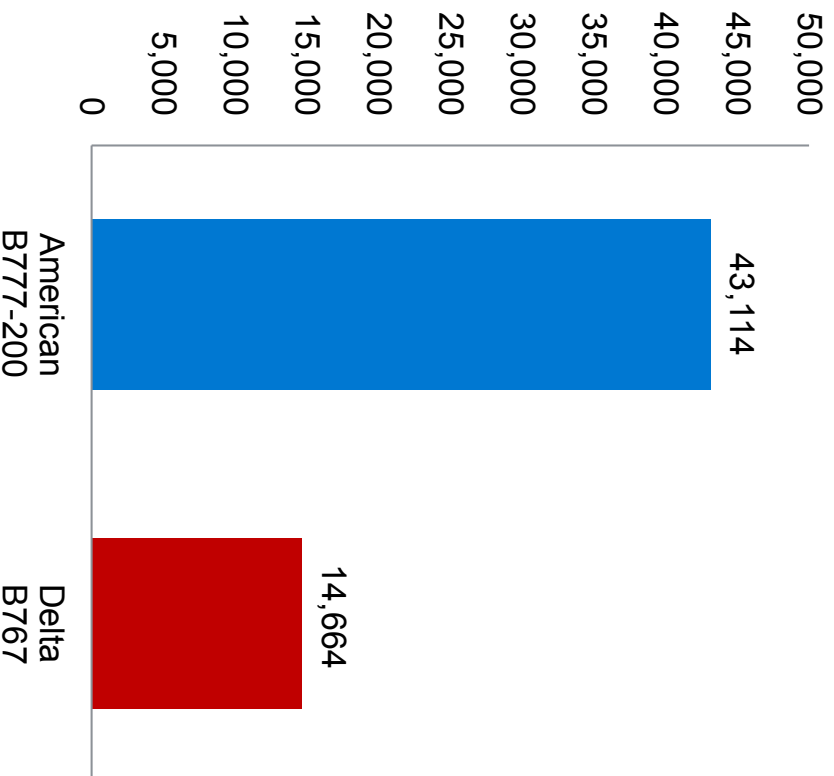


Markets connecting in BOTH directions

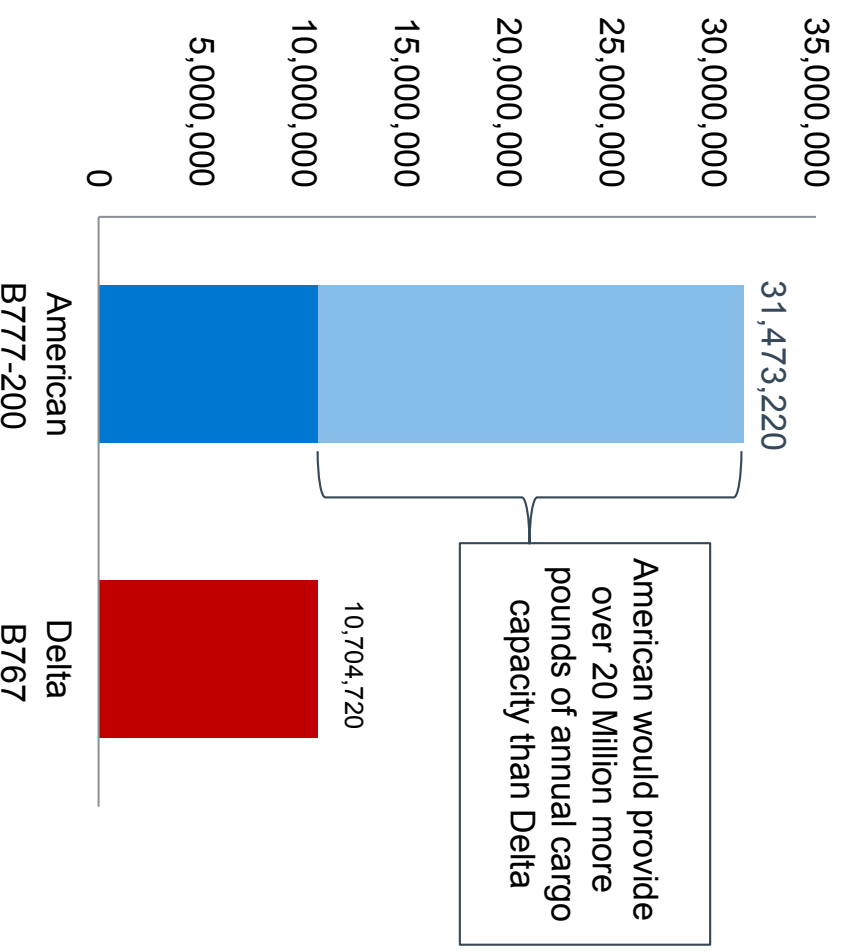
Source: O&D passengers, MIDT YE November 2014, and flight schedules. NH connecting markets operated by UA.. Washington includes DCA and IAD. New York includes JFK, LGA and EWR.

American's B777 Will Provide Superior Cargo Capacity to Delta's B767

Cargo Capacity
Average per Flight
Both Directions – Winter and Summer
Assumes 100% Load Factor



Annual Cargo Capacity
(pounds)



Source: Delta submissions to U.S. Department of Transportation, American Airlines

Series 300

Delta's History of Serving Haneda:
Numerous Promises, Failed Commitments,
Musical Gateways, Fiction-Based Excuses
and, Finally, Seatless in Seattle

NARRATIVE TO THE 300 SERIES OF EXHIBITS

The 200 Series of Exhibits demonstrated the superiority of American's proposed Los Angeles-Haneda service and the significant public benefits that service would produce. The 300 Series of Exhibits focuses on Delta's use of its Haneda slot pair allocation for Seattle-Haneda and Delta's significant misuse and underutilization of that slot pair, both at Detroit, which was the originally selected gateway, and at Seattle.

The 300 Series of Exhibits describes the several commitments Delta made to serve Haneda and its failures to do so in a manner that serves the traveling public. In these Exhibits, American describes in detail the many commitments that Delta made to the Department and the traveling public to use the scarce Haneda resource, and its repeated failures to do so.

Exhibit AA-301 illustrates that Delta made the promise to serve the Detroit-Haneda market with a B747-400 aircraft containing 403 seats, yet downgauged that aircraft to an A330 with only 241 seats, a nearly 60 percent reduction in capacity. Exhibits AA-302, AA-303, and AA-304 show that Delta operated a mere 42 percent of the frequencies promised, and, when coupled with the downgauge to the A330, only 29 percent of the seats that it had pledged were offered to customers.

Exhibits AA-305 and AA-306 show that Delta's habit of broken promises continued, this time in the Los Angeles-Haneda market. It took Delta merely 35 days to downgauge the 403-seat B747-400 to a 269-seat B777 in the Los Angeles-Haneda market. Then, after only six months, Delta downgauged the aircraft yet again from the B777 to a 241 seat A330. Finally, since March 2013, Delta has operated a 208 seat B767 aircraft. Exhibit AA-307 illustrates how Delta is now providing approximately 50 percent of the seats it promised on the Los Angeles-Haneda route.

With respect to its current Seattle-Haneda service, Exhibits AA-308-314 show how Delta also has not lived up to its commitments concerning that market. Between June 1, 2013 and March 31, 2015, Delta will have operated the Seattle-Haneda route only 40.8 percent of the time. The Exhibit shows that Delta will operate Seattle-Haneda only 17 days during a 182-day period.

While essentially abandoning the Seattle-Haneda market, Delta has maintained daily service from Seattle to Tokyo Narita. Exhibits AA-315 and AA-316 show that Delta has maintained its full Seattle-Narita schedule and offers more than double the number of seats on the Seattle-Narita route as it offers on the Seattle-Haneda route. Exhibits AA-317 through AA-319 show how Delta is competing against itself in both the Seattle market (serving both Narita and Haneda) and the Haneda market (serving both Seattle and Los Angeles).

Exhibits AA-320 through AA-323 demonstrate the astonishingly low load factor of Delta's Seattle-Haneda service compared to other airlines operating in the U.S.-Haneda market, and on Delta's other Tokyo services. In Exhibit AA-324, American presents over 10 pages of evidence that clearly illustrate that, contrary to Delta's excuse for not providing service in the Seattle-Haneda market, neither Haneda nor Tokyo as a whole is a seasonal market.

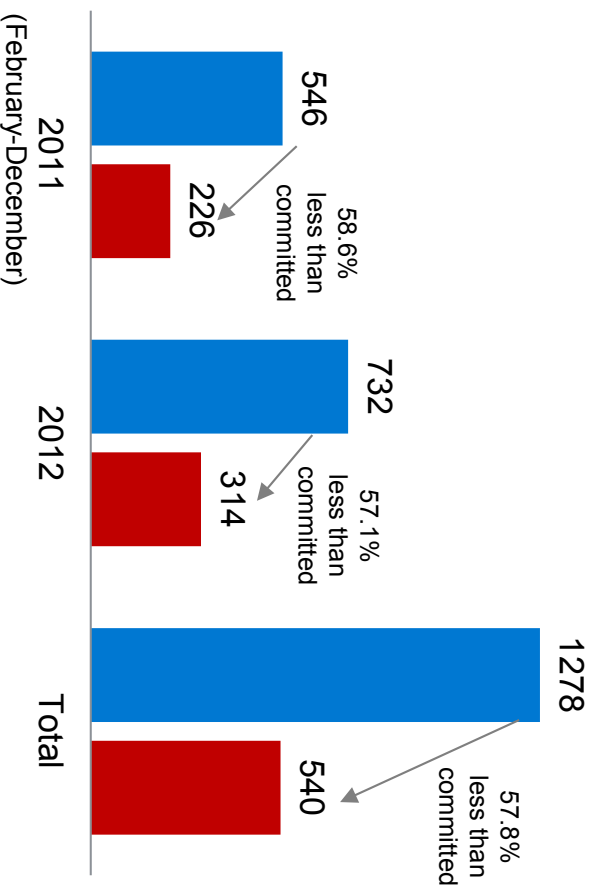
Delta's Failed Detroit-Haneda Commitment

	Delta Detroit Commitment	Delta's Actual Service
Aircraft	B747-400	A330 (Downgraded after only 37 B747-400 flights)
Seats (per Flight)	403	241
Seats (Annual)	294,190	75,674
ASM's (Annual)	1,885,757,900	486,432,472
Annual Departures	730	314 (2012)
Service Start Date	January 2011	February 2011, then Suspended April 2011
		Resumed June 2011
		Suspended September through most of April 2012
		Ended October 2012

Source: Delta submissions to U.S. Department of Transportation, OAG flight schedules

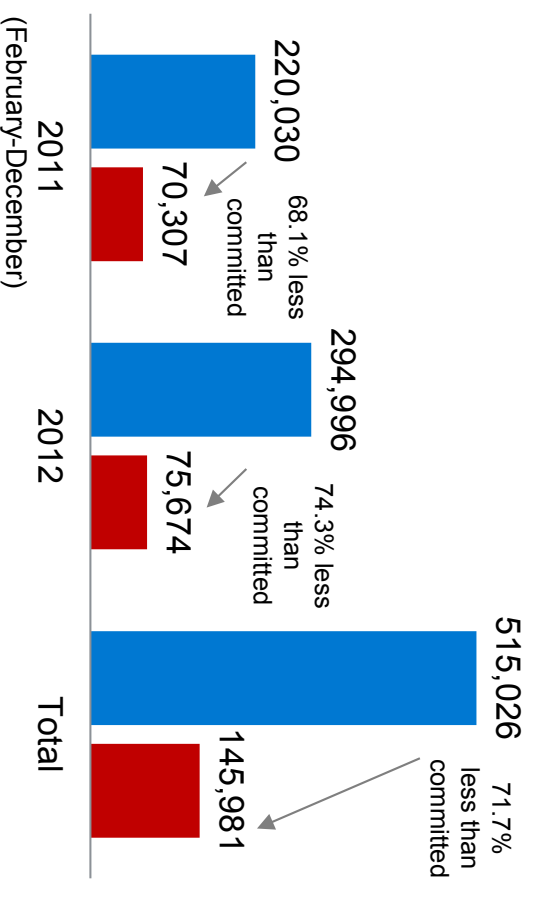
Delta's Failed Detroit-Haneda Commitment: Even Eliminating April and May 2011 as "Tsunami-Related" Service Interruption Months, Delta Operated Only 42% of the Flights and Offered Only 28% of the Seats It Promised to Provide in the Detroit-Haneda Market

Flights Committed versus Flights Actually Operated



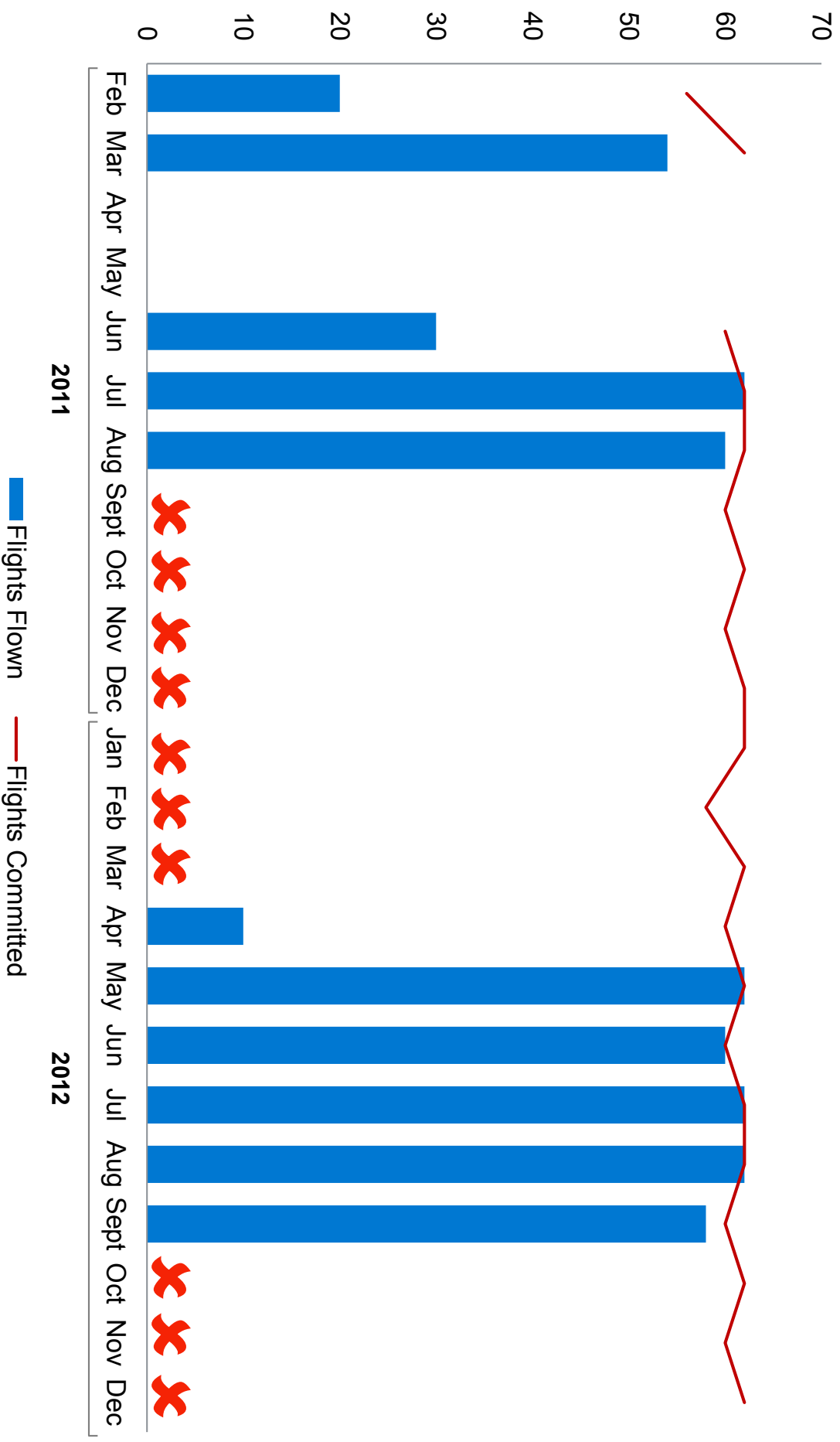
Delta Operated Only 42% of the
Detroit-Haneda Flights It Promised to Operate

Seats Committed versus Seats Actually Operated



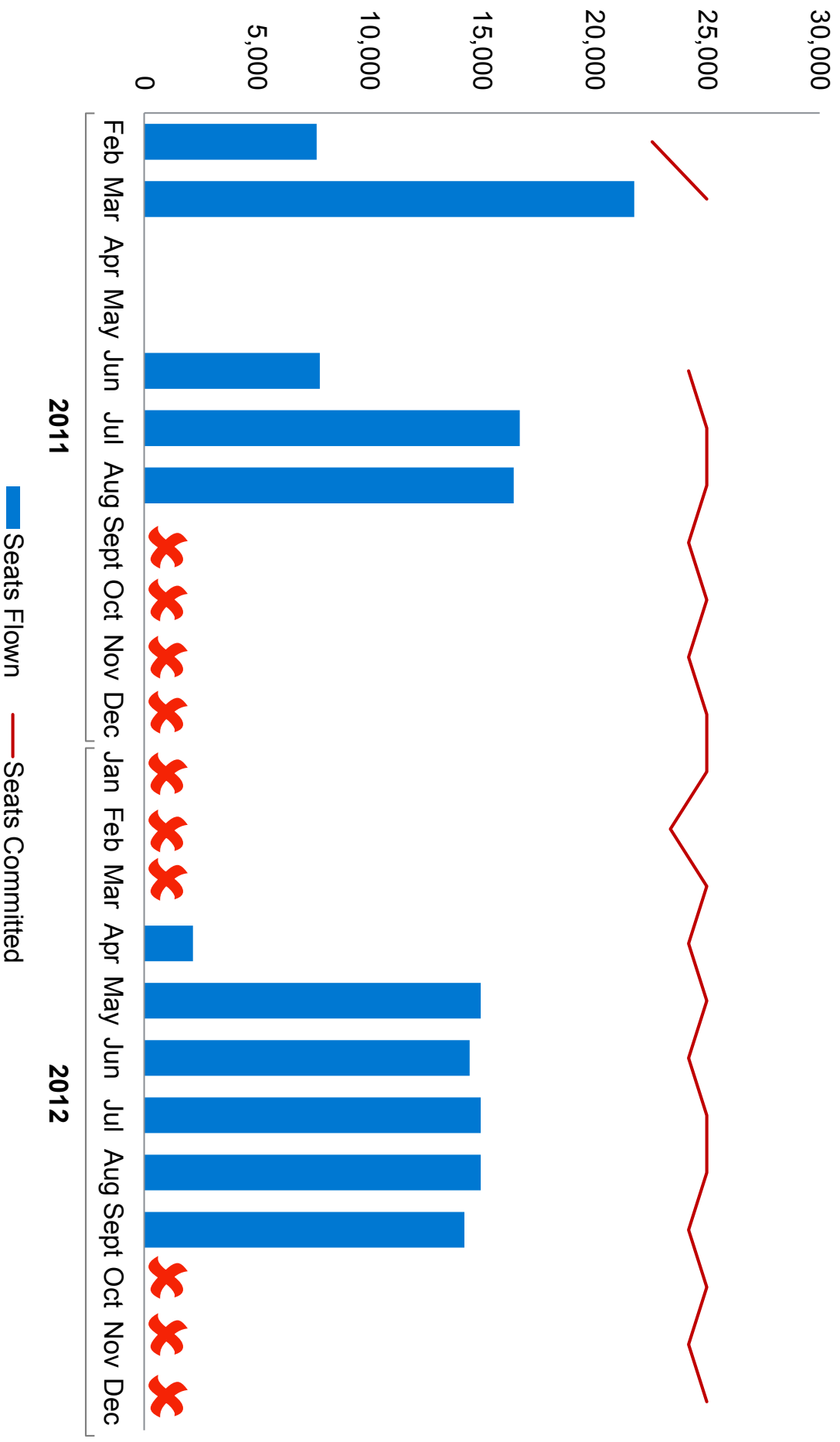
Delta Offered Only 28% of the Detroit-Haneda
Seats It Promised to Provide

Delta's Failed Detroit-Haneda Commitment: Flights Committed versus Flights Flown



Source: Delta submissions to U.S. Department of Transportation, OAG flight schedules

Delta's Failed Detroit-Haneda Commitment: Seats Committed versus Seats Flown

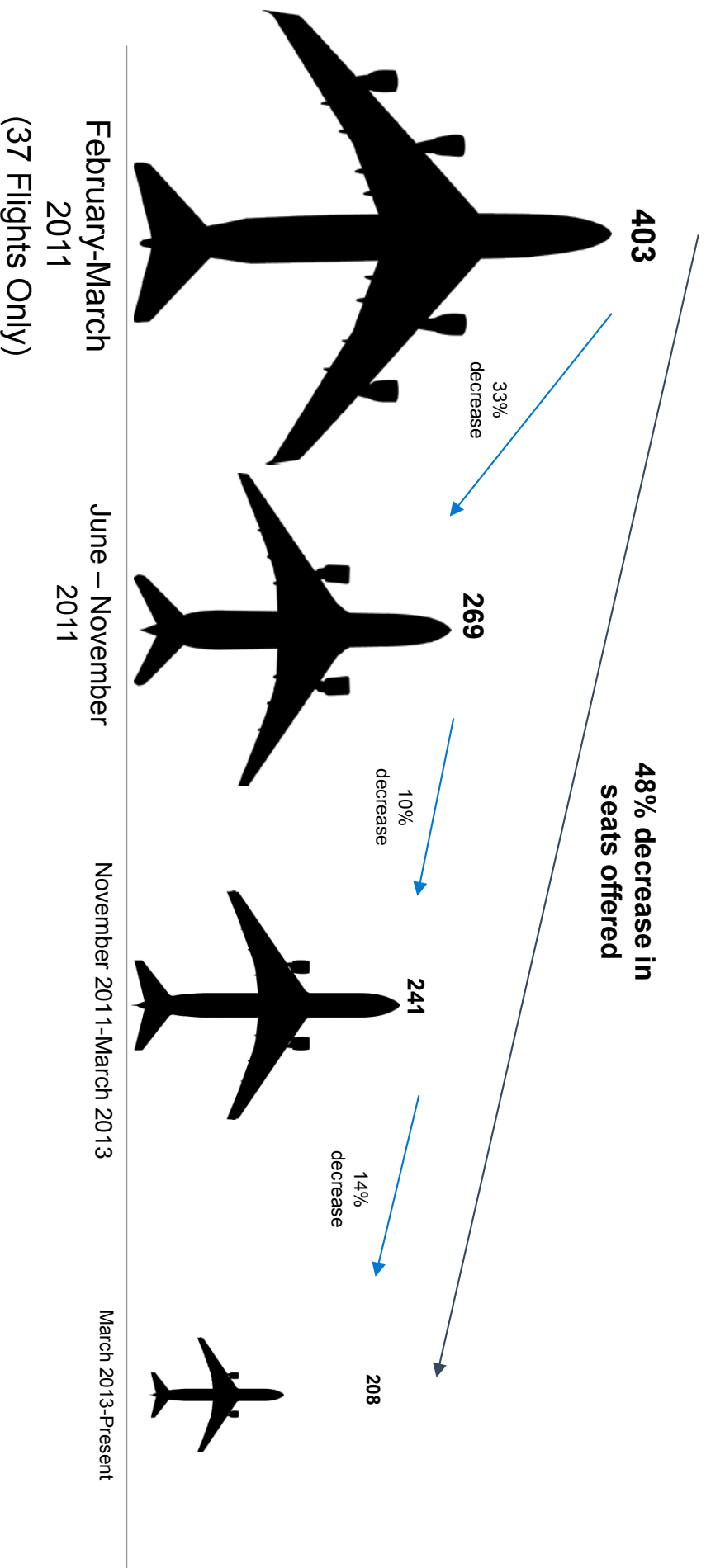


Source: Delta submissions to U.S. Department of Transportation, OAG flight schedules

Delta's Failed Los Angeles--Haneda Commitment

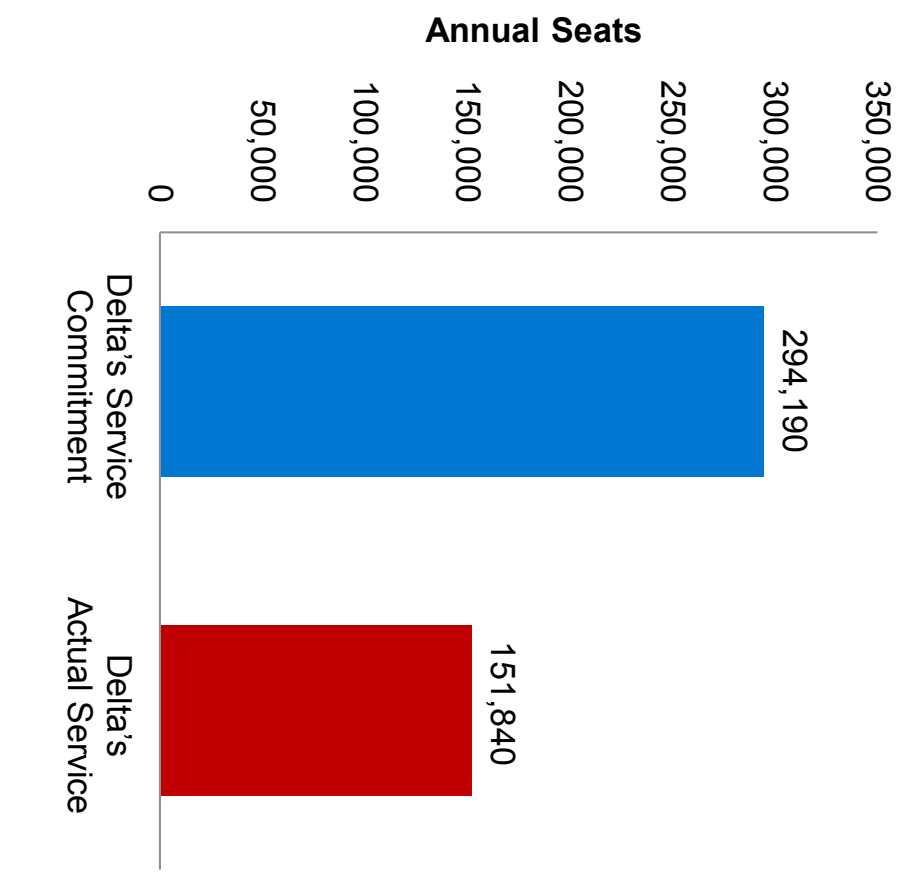
	Delta's Los Angeles Commitment	Delta's Actual Service
Aircraft	B747-400	B747-400 -> B777 -> A330 -> B767 (currently)
Seats (per Flight)	403	403 -> 269 -> 241 -> 208 (currently)
Seats (Annual)	294,190	148,044(currently)

Delta's Failed Los Angeles-Haneda Commitment: Delta's Dwindling Los Angeles-Haneda Aircraft Size



Delta's Failed Los Angeles-Haneda Commitment: Seats Committed versus Seats Flown

**Delta Is Providing Nearly 50% Fewer Seats on the
Los Angeles-Haneda Route Than It Proposed**



**48.4% Fewer Seats Offered
By Delta on
Los Angeles-Haneda Route
Than Delta Proposed**

Delta's Failed Seattle Commitments . . . And There Are Several

Delta Seattle–Haneda Proposal February 2010

Delta's Seattle – Haneda Nonstop Service Proposal
 Annual Operating Statistics



Aircraft	Airbus A330-300
Departures	730
Segment Miles (sm)	4,790
Plane Miles (sm)	3,496,700
ASMs	1,042,016,600
Fuel Consumption (millions of gallons)	13.7

Statement on fuel availability: Delta anticipates no difficulty in obtaining fuel from suppliers at Seattle or Haneda.

Delta Seattle–Haneda Proposal August 2012


Delta's Seattle – Haneda Nonstop Service Proposal
 Annual Operating Statistics



Aircraft	Boeing 767-300ER HD
Departures	730
Segment Miles (sm)	4,803
Plane Miles (sm)	3,506,190
ASMs	788,892,750
Fuel Consumption (millions of gallons)	11.8

Statement on fuel availability: Delta anticipates no difficulty in obtaining fuel from suppliers at Seattle or Haneda.

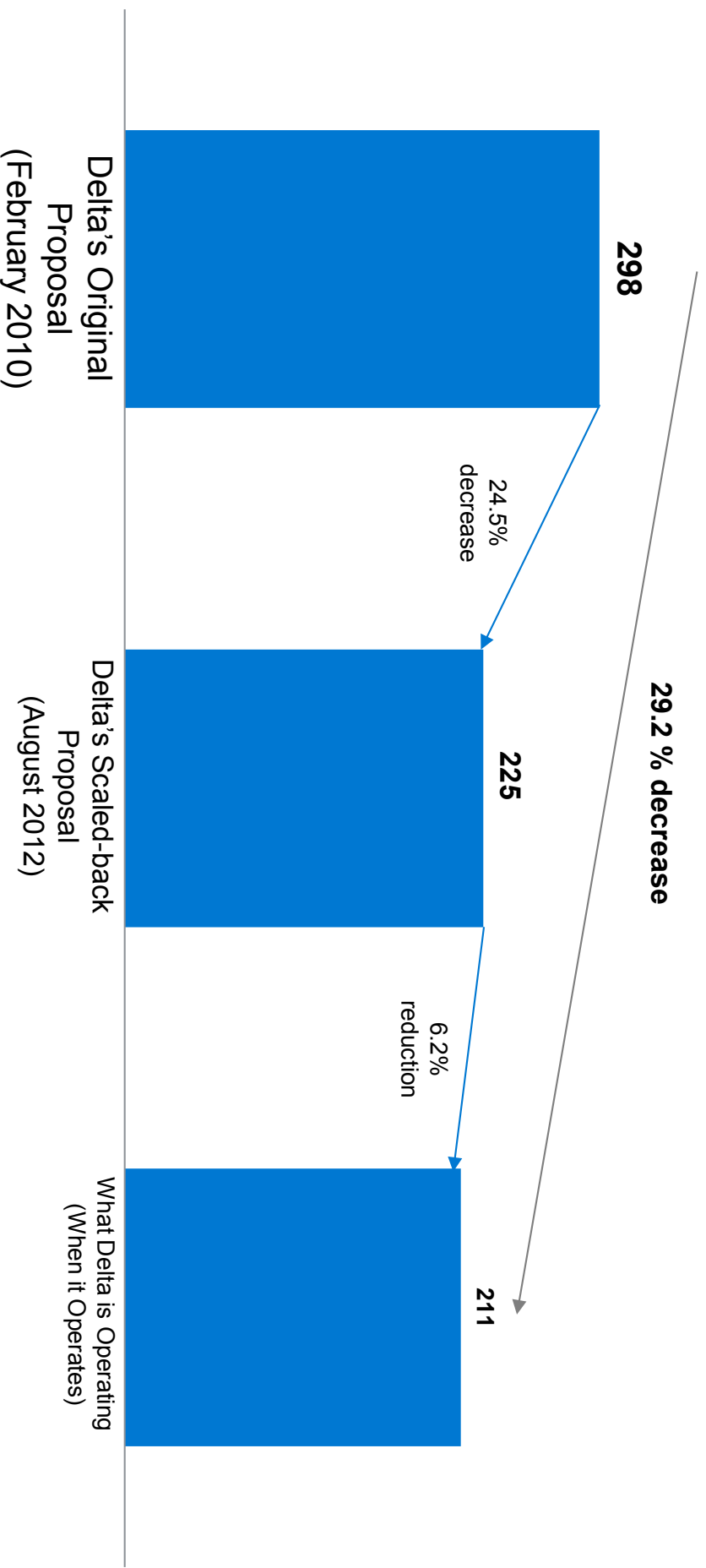
In Its Proposal to Switch out SEA for DTW, Delta Reduced the Aircraft Type and Size Originally Proposed for SEA from A330-300/298 seats to B767-300ER HD/225 seats — a 24.5%Seat Reduction . . .

But, Still, it committed to Daily Service  **However . . .**

Delta's Failed Seattle-Haneda Commitment:

Delta Has Not Lived Up to Its Substantially-Scaled Back Seattle-Haneda Service Proposal

Delta Has Downgraded the B767 It Operates on the Seattle-Haneda Route – When it Operates – to 211 Seats



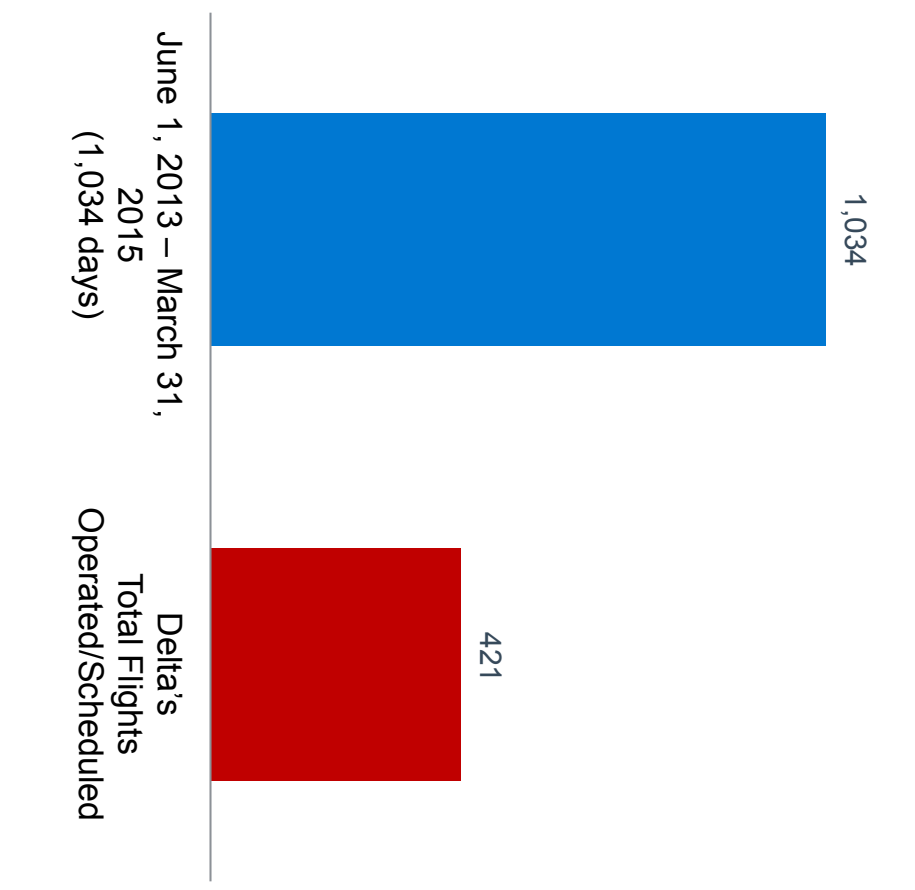
... And, Still Again, Delta Has Not Lived Up to Its Commitments, Resulting In



Delta's Failed Seattle-Haneda Commitment: Seatless in Seattle

Delta's Current Seattle-Haneda "Offering"

Flights Committed by Delta versus Flights Actually Operated



**Delta Will Have Operated the
Seattle-Haneda Route Only
40.8% of the Time**
(June 1, 2013 – March 31, 2015)

Source: Delta submissions to U.S. Department of Transportation, OAG flight schedules

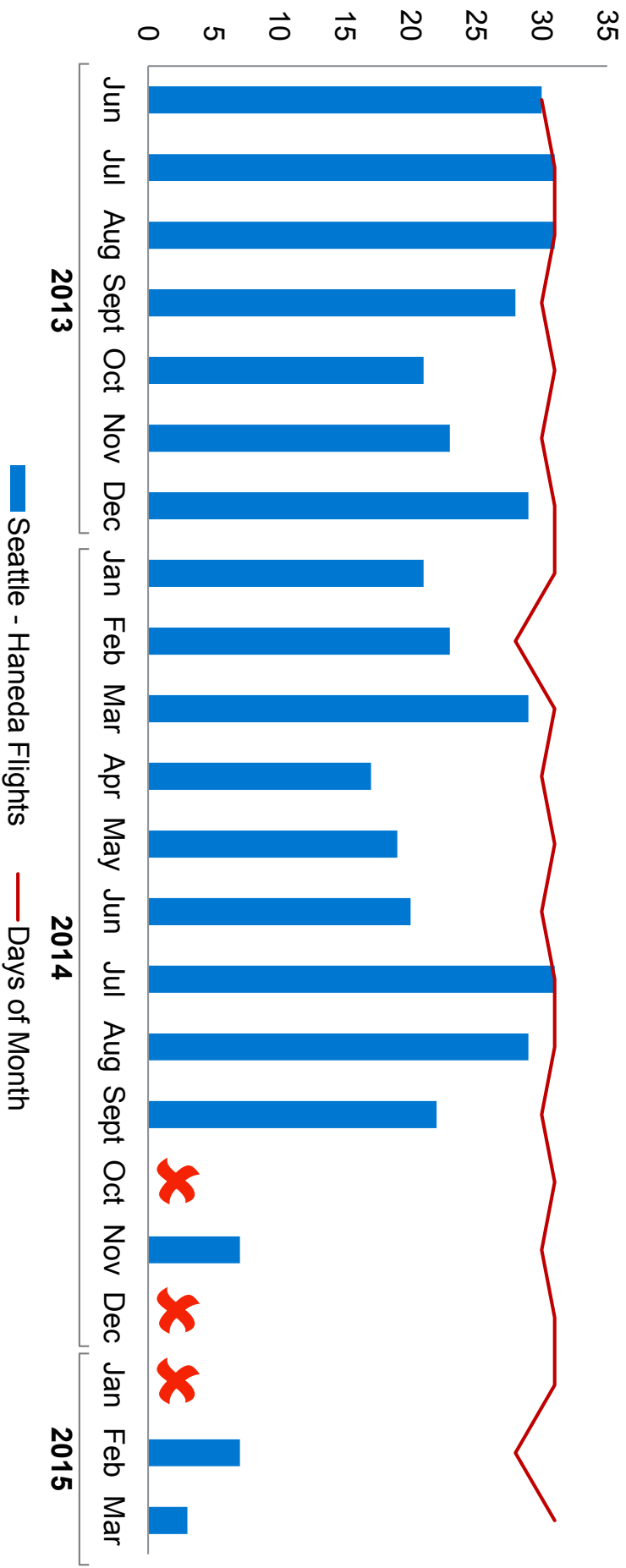
Delta's Failed Seattle-Haneda Commitment: Seatless in Seattle

Delta Has Constructively Abandoned the Seattle-Haneda Market Since October 2014

Month	Days	Delta Flights Operated/Scheduled
October 2014	31	0
November 2014	30	7
December 2014	31	0
January 2015	31	0
February 2015	28	7
March 2015	31	3
Total	182	17

Delta's Failed Seattle-Haneda Commitment: Seatless in Seattle

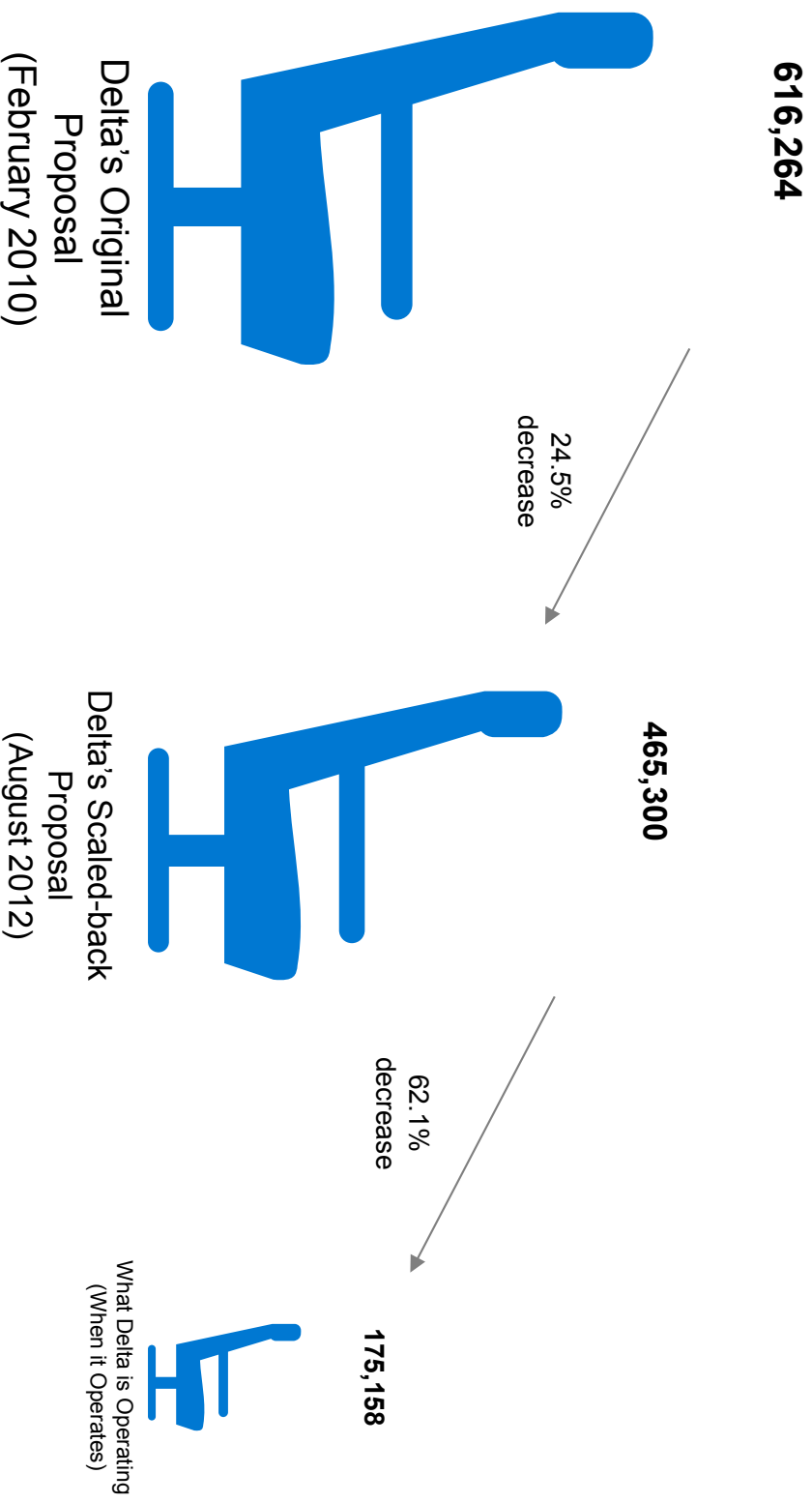
Since Delta Inaugurated Seattle-Haneda Service, It Will Have Operated a Daily Service in Only 4 of the 22 Months Through March 2015 and in Only One Month Since August 2013



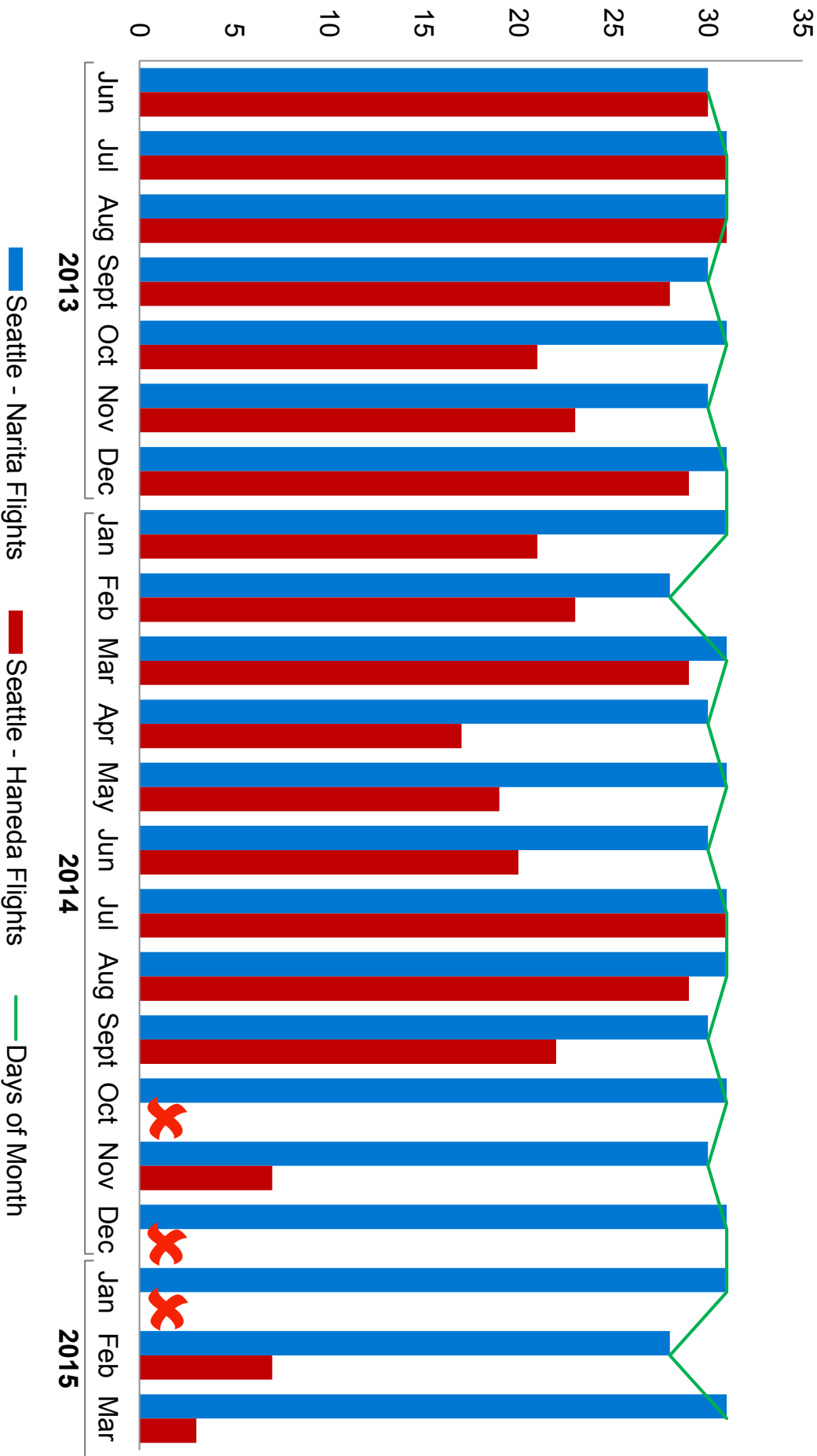
- Only 4 months out of 22 with daily service
- 9 months with service 20 days or less
- 6 months with service 7 days or less
- 3 months with no service at all

Delta's Failed Seattle-Haneda Commitment: Seatless in Seattle

Delta Has Provided Over 62% Fewer Seats – Close to 289,000 Seats – Than It Committed to Provide Under Its Scaled-Back August 2012 Seattle-Haneda Service Proposal



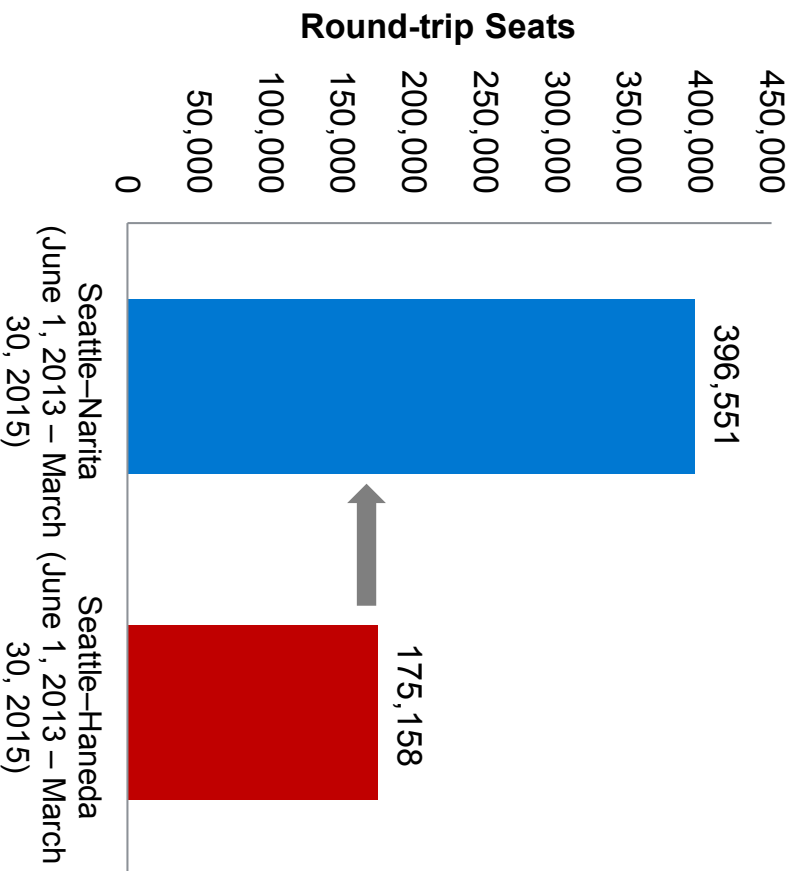
While Delta Has Abandoned the Seattle–Haneda Market, It Has Maintained Its Full Daily Schedule of Seattle-Narita Flights



And . . .

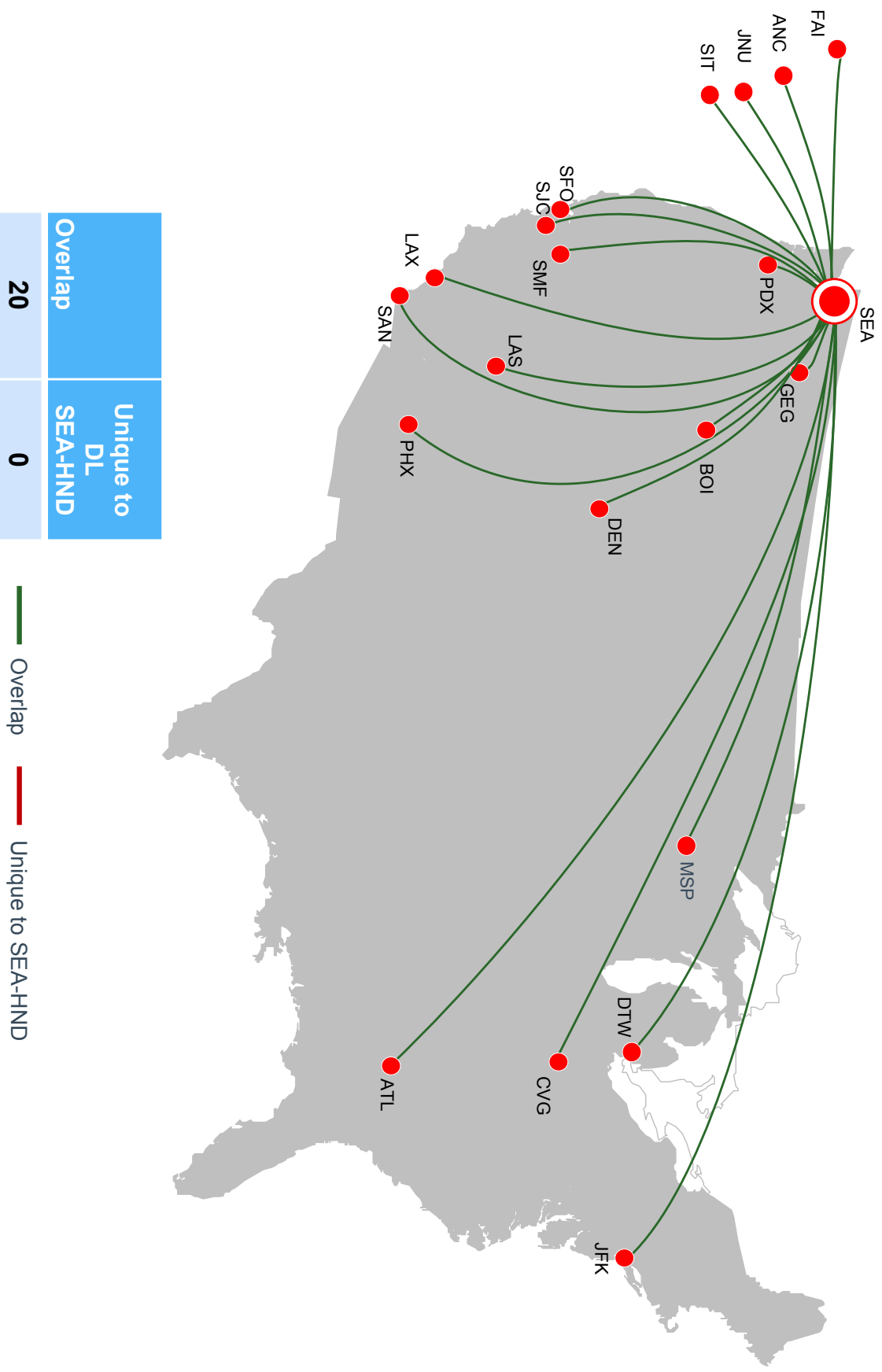
Source: OAG flight schedules

... Delta Offers More Than Twice the Number of Seats on the Seattle-Narita Route as It Offers on the Seattle-Haneda Route



On the Seattle-Haneda Route, Delta Offers Only 44.5% of the Seats Offered on Its Seattle-Narita Route

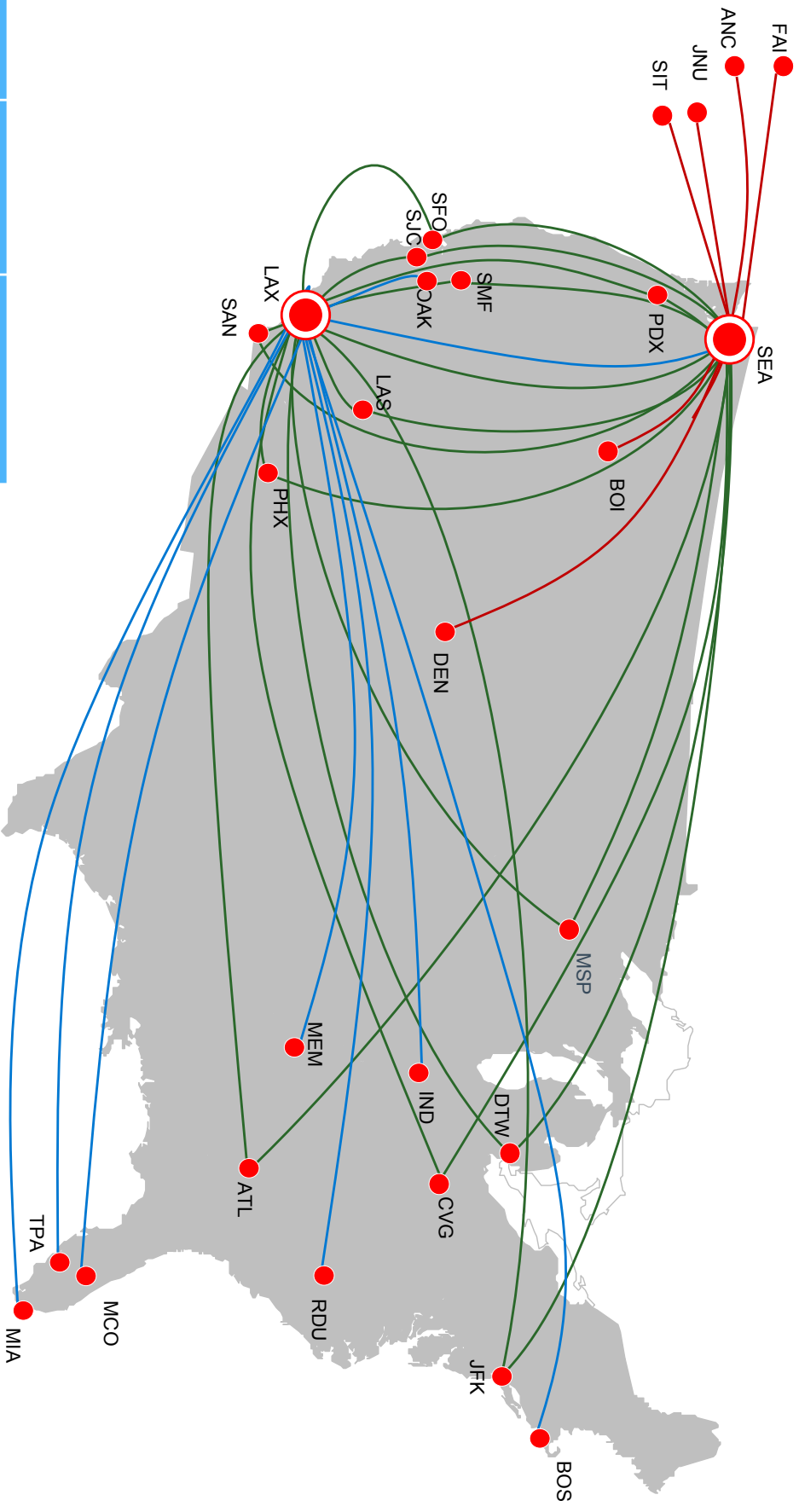
Delta Competes With Itself at Seattle:
Delta's Seattle-Haneda Route Offers No Connecting U.S. Markets
Not Already Offered on Delta's Seattle-Narita Route for U.S. Connecting Traffic



Markets connecting in BOTH directions

Source: OAG flight schedules

Delta Competes With Itself to Haneda:
 There Are More Overlap Markets Between Delta's SEA-HND and LAX-HND Services
 Than Unique Markets on Either Route



— Overlap — Unique to DL SEA-HND — Unique to DL LAX-HND

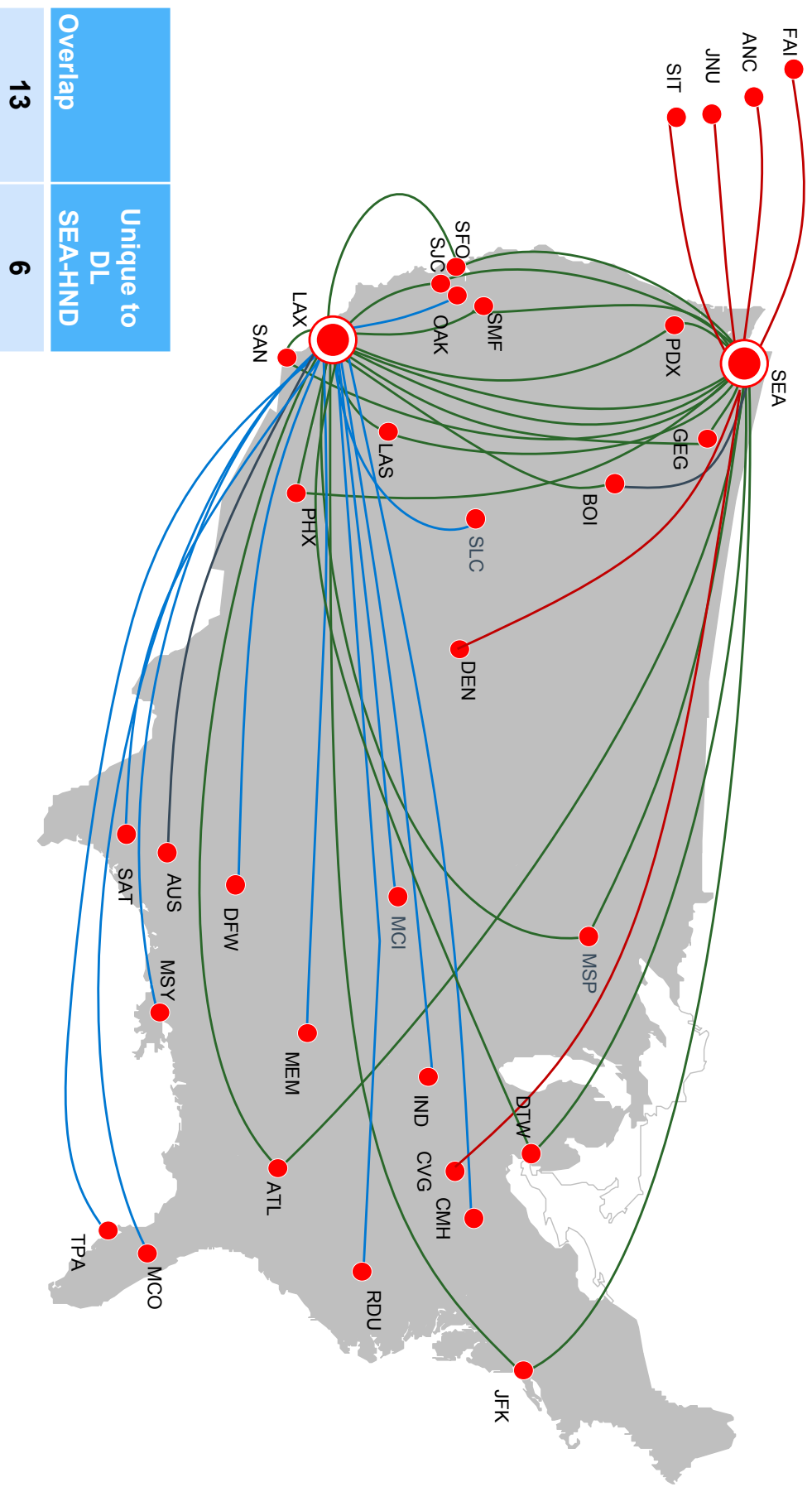
Overlap	Unique to DL SEA-HND	Unique to DL LAX-HND
12	8	9

Markets connecting in BOTH directions

Source: OAG flight schedules

#LetAFlyHaneda

Delta Competes With Itself to Tokyo:
Delta's Seattle-Haneda Route Competes and Overlaps with Delta's
Los Angeles-Narita Route for U.S. Connecting Traffic and . . .



— Overlap
 — Unique to SEA-HND
 — Unique to LAX-NRT

Markets connecting in BOTH directions

Source: OAG flight schedules, August 2015. LAX and SEA are considered overlapping markets

#LetAFlyHaneda

. . . The Only Six Unique SEA-HND Connecting Points Account for
Only 47 O&D Passengers (PPDEW) to Tokyo

DL Unique Connecting Markets for SEA- HND

Unique to SEA-HND	Tokyo O&D
Anchorage	5.2
Cincinnati	10.2
Denver	27.8
Fairbanks	3.4
Juneau	0.2
Sitka	0.0
Total	46.8

Markets connecting in BOTH directions

Source : O&D passengers, MIDT YE November 2014.

Delta Has the Lowest Load Factor, By Far, of Any Airline Operating U.S.–Hanedada Service

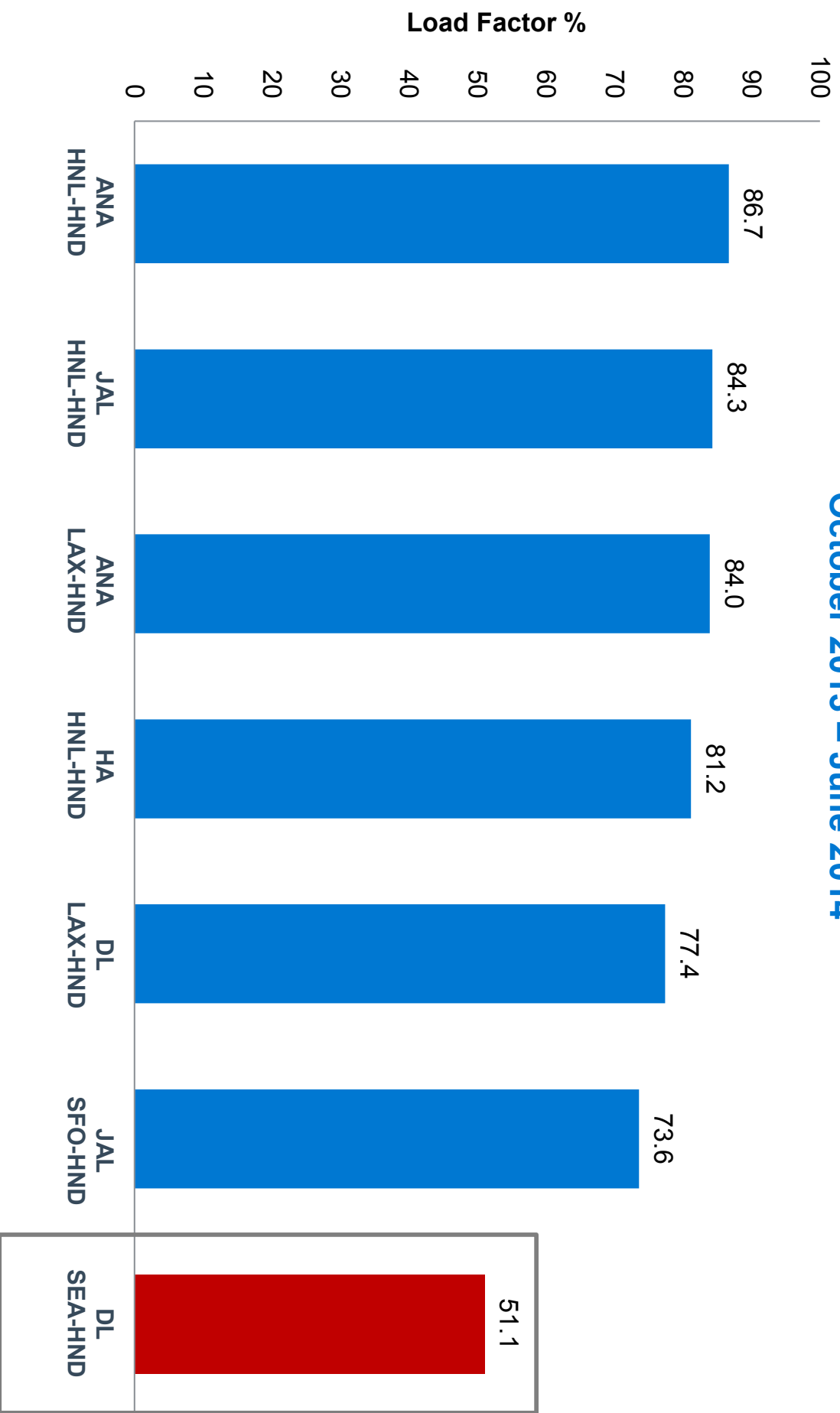
Load Factor for all U.S.–Hanedada Flights for Oct 2013 – Jun 2014

Airline	U.S. Gateway	Onboard Passengers	Seats	Load Factor
American	JFK	8,376	12,981	64.5
Delta	LAX	40,422	52,289	77.4
Delta	SEA	21,154	41,418	51.1
Hawaiian	HNL	65,087	80,115	81.2
JAL	HNL	71,035	84,230	84.3
JAL	SFO	37,110	50,406	73.6
ANA	HNL	51,300	59,163	86.7
ANA	LAX	51,167	60,947	84.0

Even American's JFK-HND Service, Which American Cancelled due to Commercially Unavailable Slot Times at Haneda, Had a Load Factor 13 Load Factor Points and 26.1% Higher Than Delta's Seattle–Hanedada Load Factor

Delta Has the Lowest Load Factor, By Far, of Any Airline Operating U.S.–Haneda Service

October 2013 – June 2014

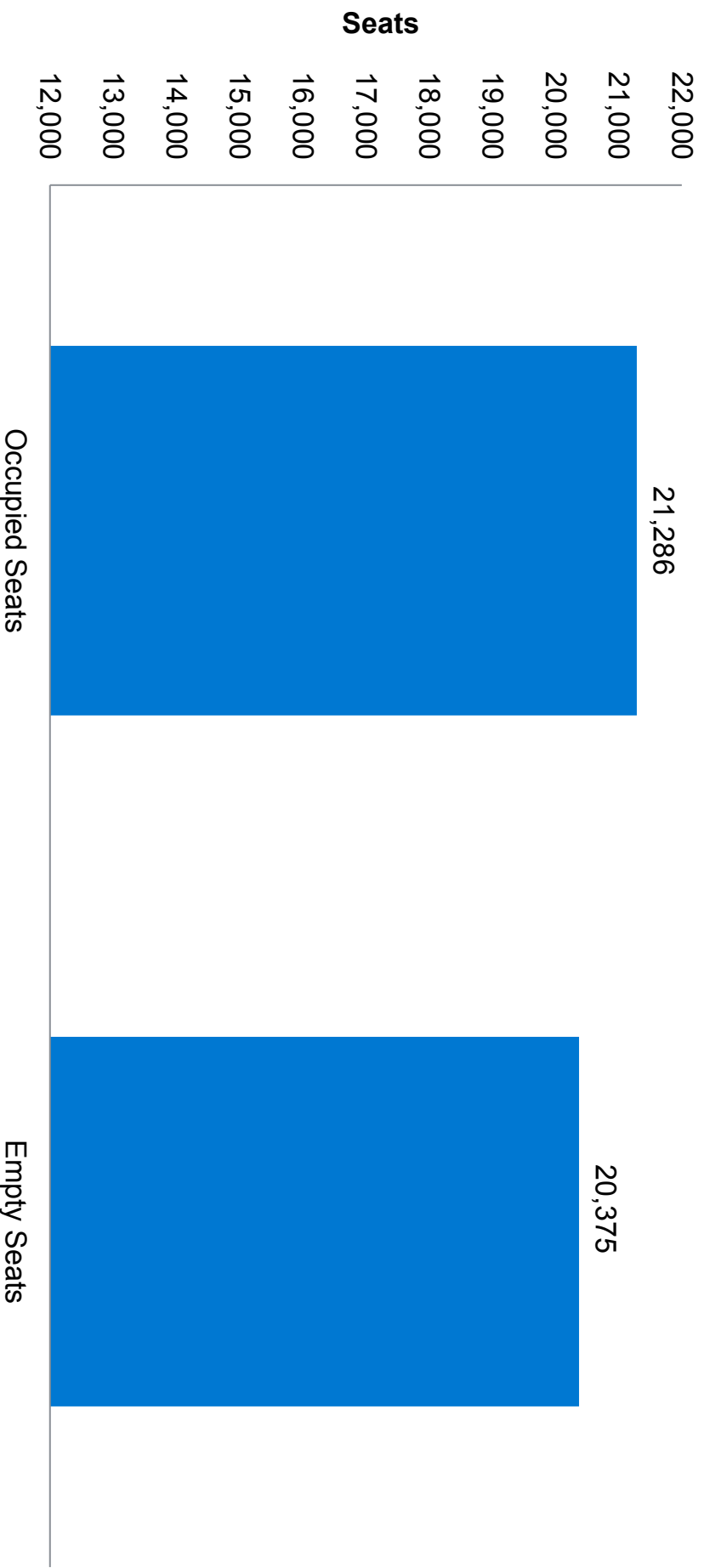


Note: United currently operating SFO-HND service but no publicly available information because of the recent inauguration of that service
Source: U.S. DOT T100, OAG flight schedules

Delta Had Almost as Many Empty Seats as It Had Occupied

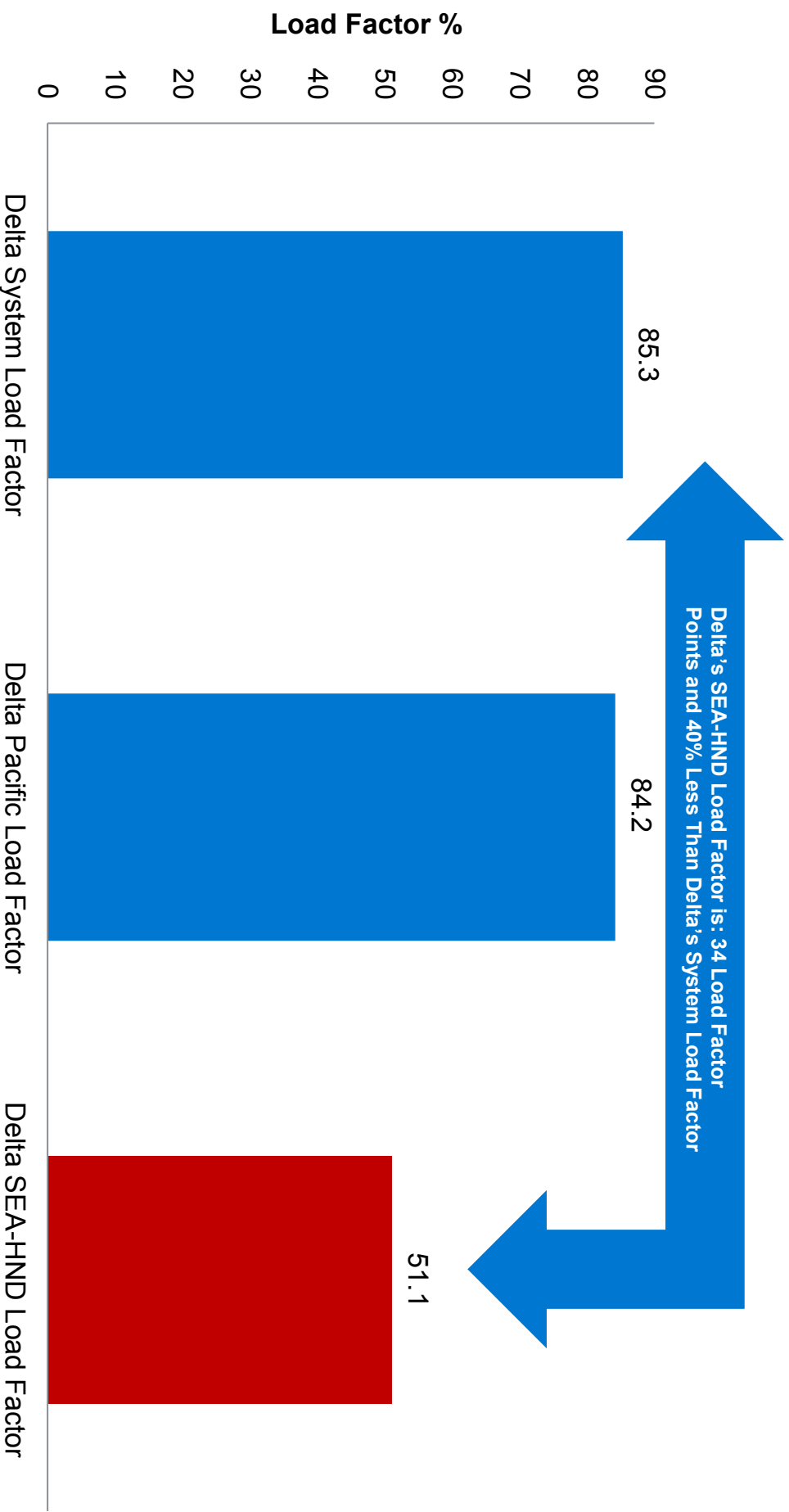
Seats on Its Seattle-Haneda Flights

October 2013 – June 2014



Source: U.S. DOT T100

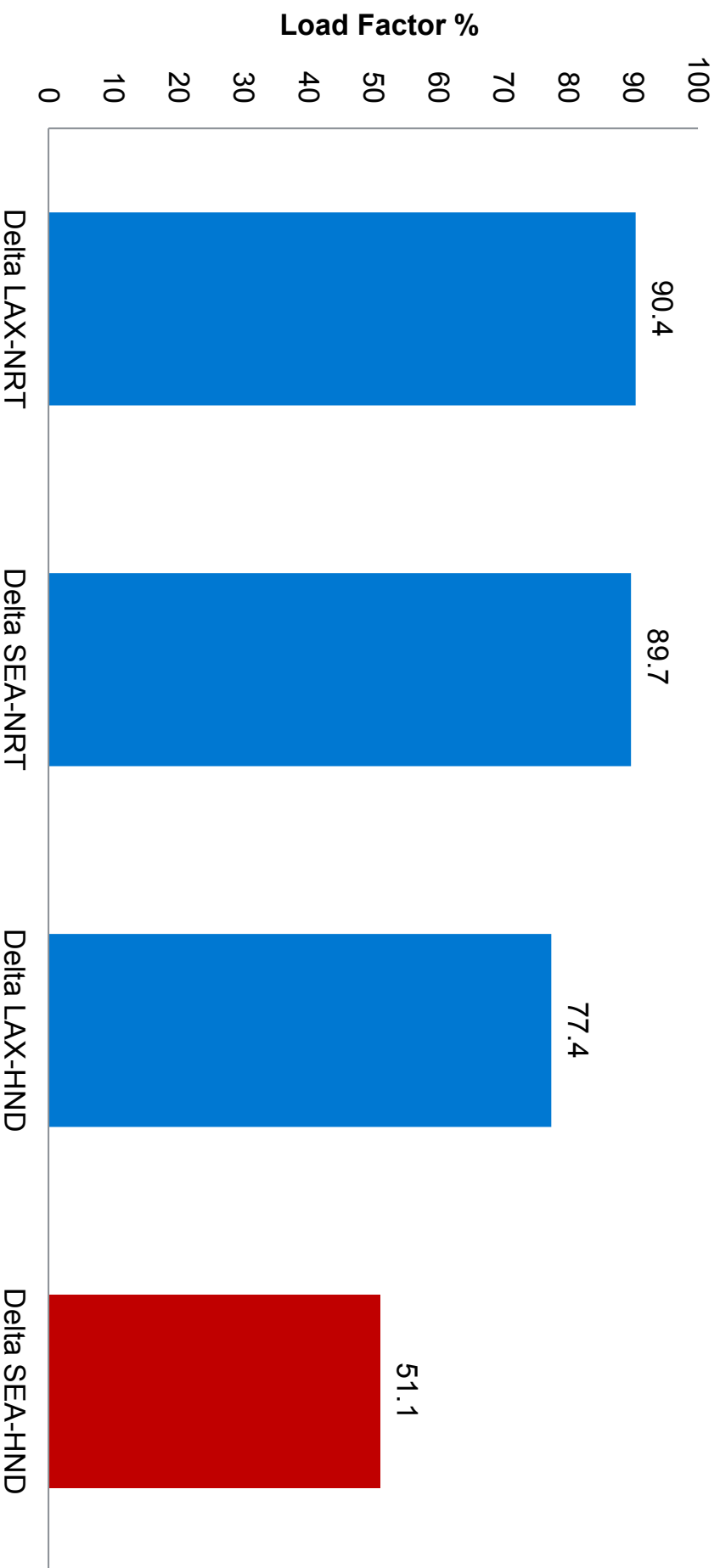
Delta's Seattle-Haneda Load Factor Is 39% Lower Than Its Asia Load Factor and 40% Lower Than Its System Load Factor



Note: For nine month period (for SEA-HND October 2013 to June 2014 – For System and Pacific load factor data for January to September 2014)
Source: Delta Press Release, October 2, 2014

In Contrast to Delta's SEA-HND Load Factor of 51%, Delta's LAX-HND Route Experiences a Load Factor of 77.4%, Delta's SEA-NRT Route Experiences a Load Factor of 89.7%, and Its Los Angeles-Haneda Route Enjoys a Load Factor of 90.4%

October 2013 – June 2014



- Delta's LAX-NRT Flight Load Factor is 77.9% Higher Than Its SEA-HND Flight
- Delta's SEA-NRT Flight Load Factor is 76% Higher Than Its SEA-HND Flight,
- Delta's LAX-HND Flight Load Factor is 52% Higher Than Its SEA-HND Flight

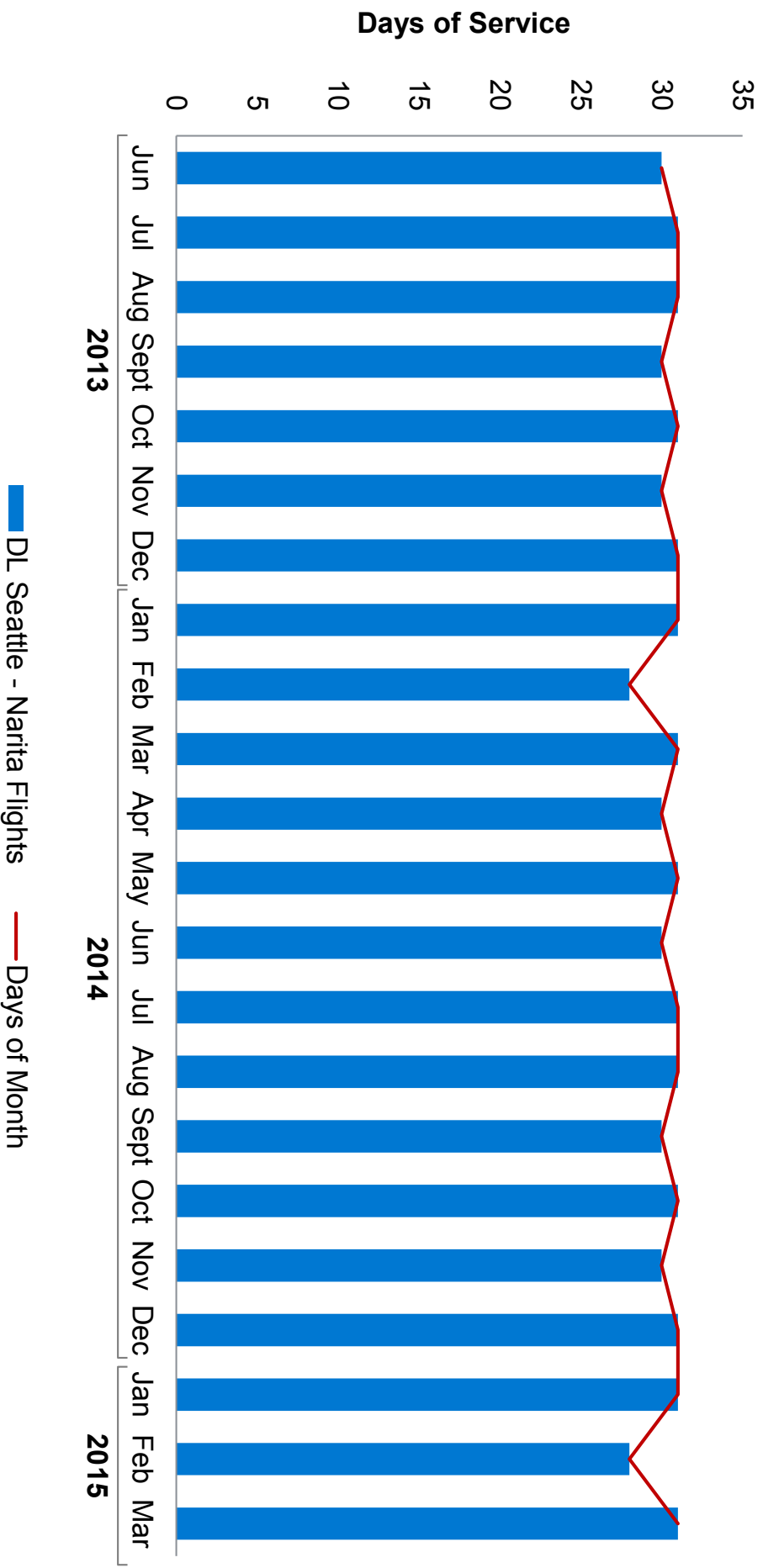
Source: U.S. DOT T100, OAG flight schedules

“Seasonality” Is an Excuse Concocted by Delta for Ceasing Seattle-Haneda Service; It is Not a Reality

- Delta displays **no** seasonality in its Seattle-Narita schedule
- ANA displays **no** seasonality in its Seattle-Narita schedule
- **No** other U.S. airline serving Haneda has a “seasonal” Haneda schedule
- **No** Japanese airline serving Haneda has a “seasonal” Haneda schedule
- **No** carrier (U.S., Japanese and third party) serving Haneda has a “seasonal” schedules
- Delta has **no** “seasonal” schedule for any of its services to Narita
- All other U.S. airlines serving Narita have a year-round service. **No** seasonal service

“Seasonality” Is an Excuse Concocted by Delta for Ceasing Seattle-Haneda Service; It Is Not a Reality

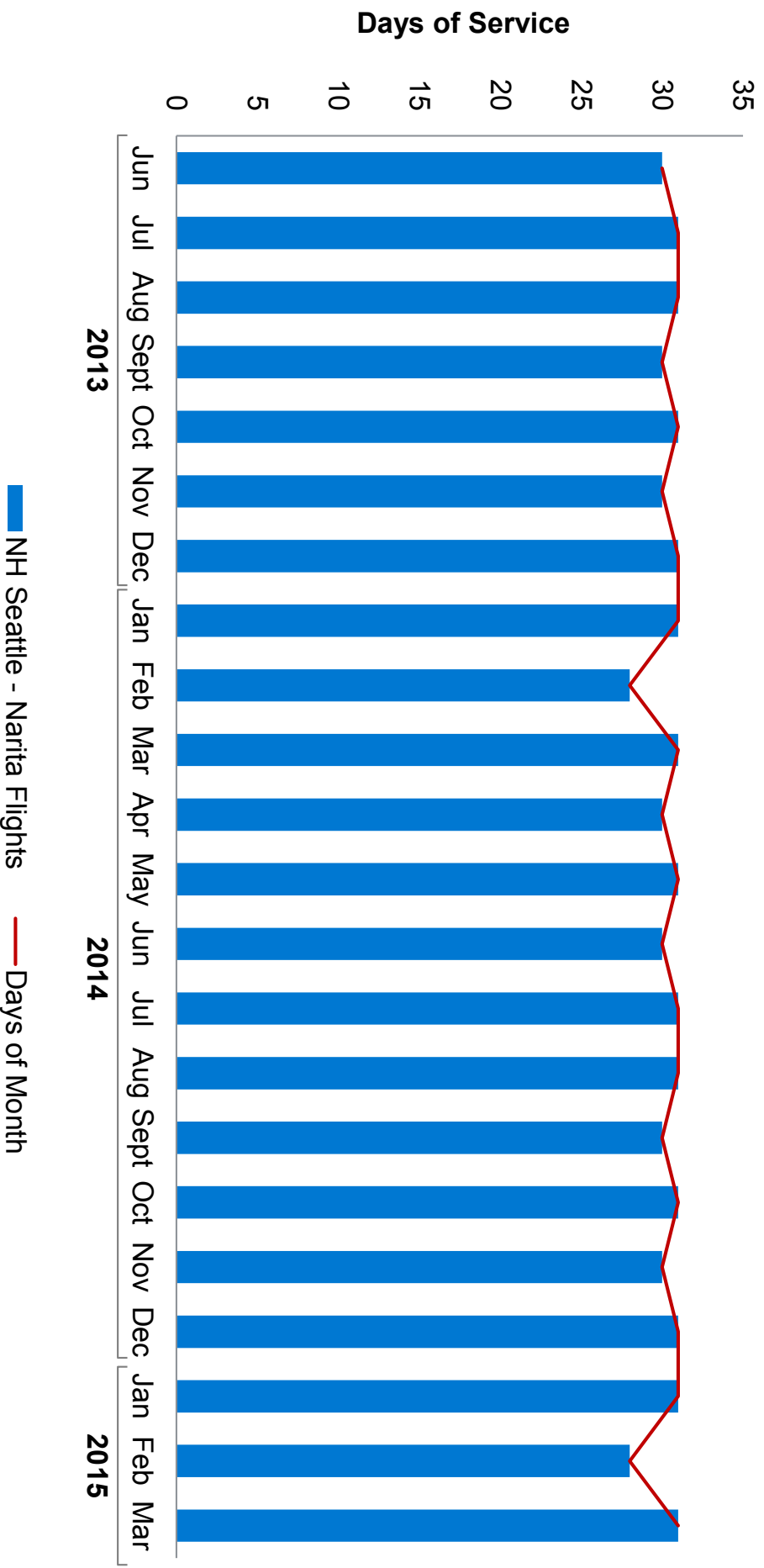
Delta Operates a Daily Service on the Seattle-Narita Route Year-round -> No Seasonality



Source: OAG flight schedules

“Seasonality” Is an Excuse Concocted by Delta for Ceasing Seattle-Haneda Service; It Is Not a Reality

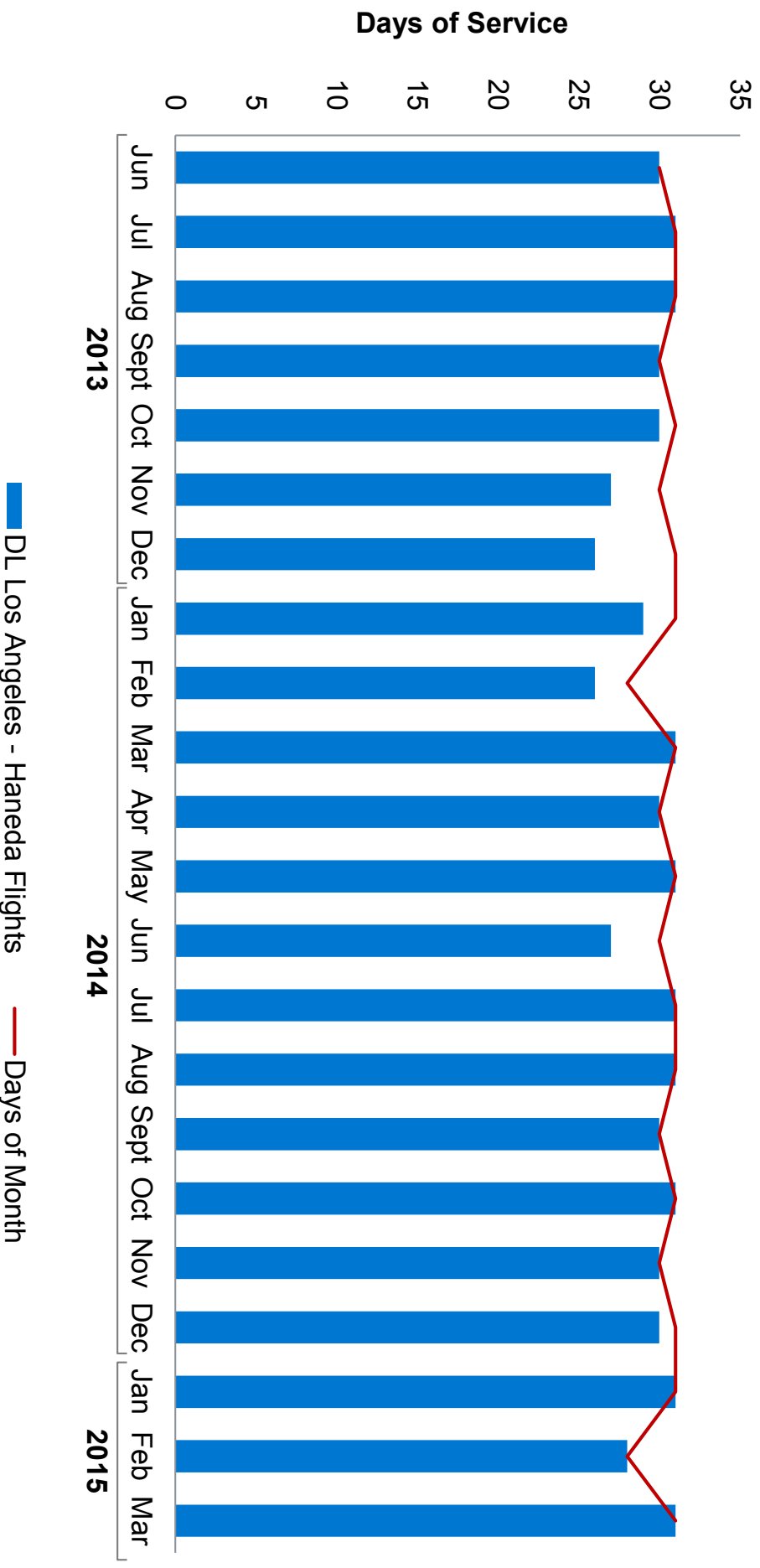
ANA Operates a Daily Service on the Seattle-Narita Route Year-round -> No Seasonality



Source: OAG flight schedules

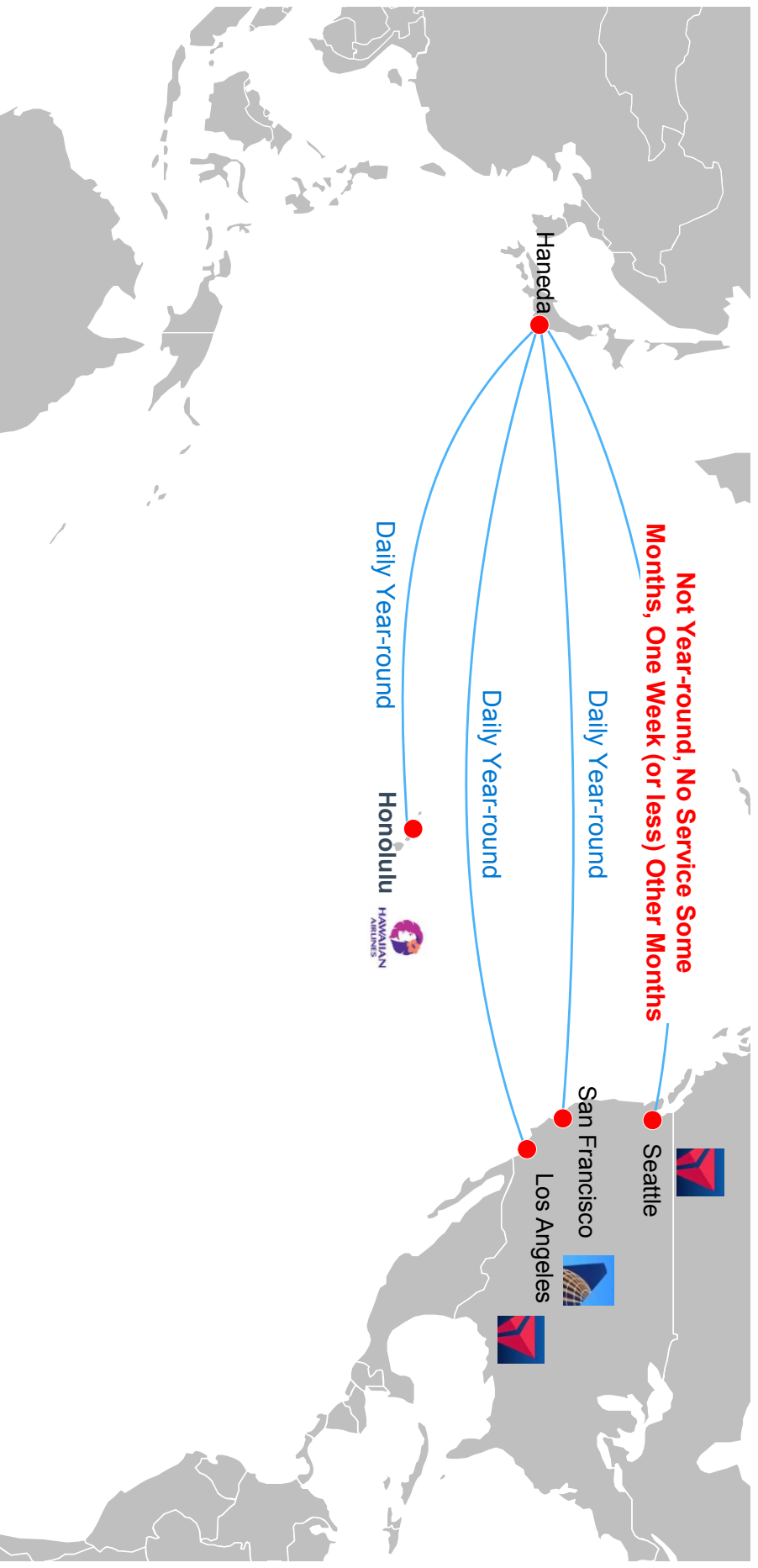
“Seasonality” Is an Excuse Concocted by Delta for Ceasing Seattle-Haneda Service; It Is Not a Reality

Delta Does Not Operate a “Seasonal” Service on Its Los Angeles-Haneda Route -> **No Seasonality**



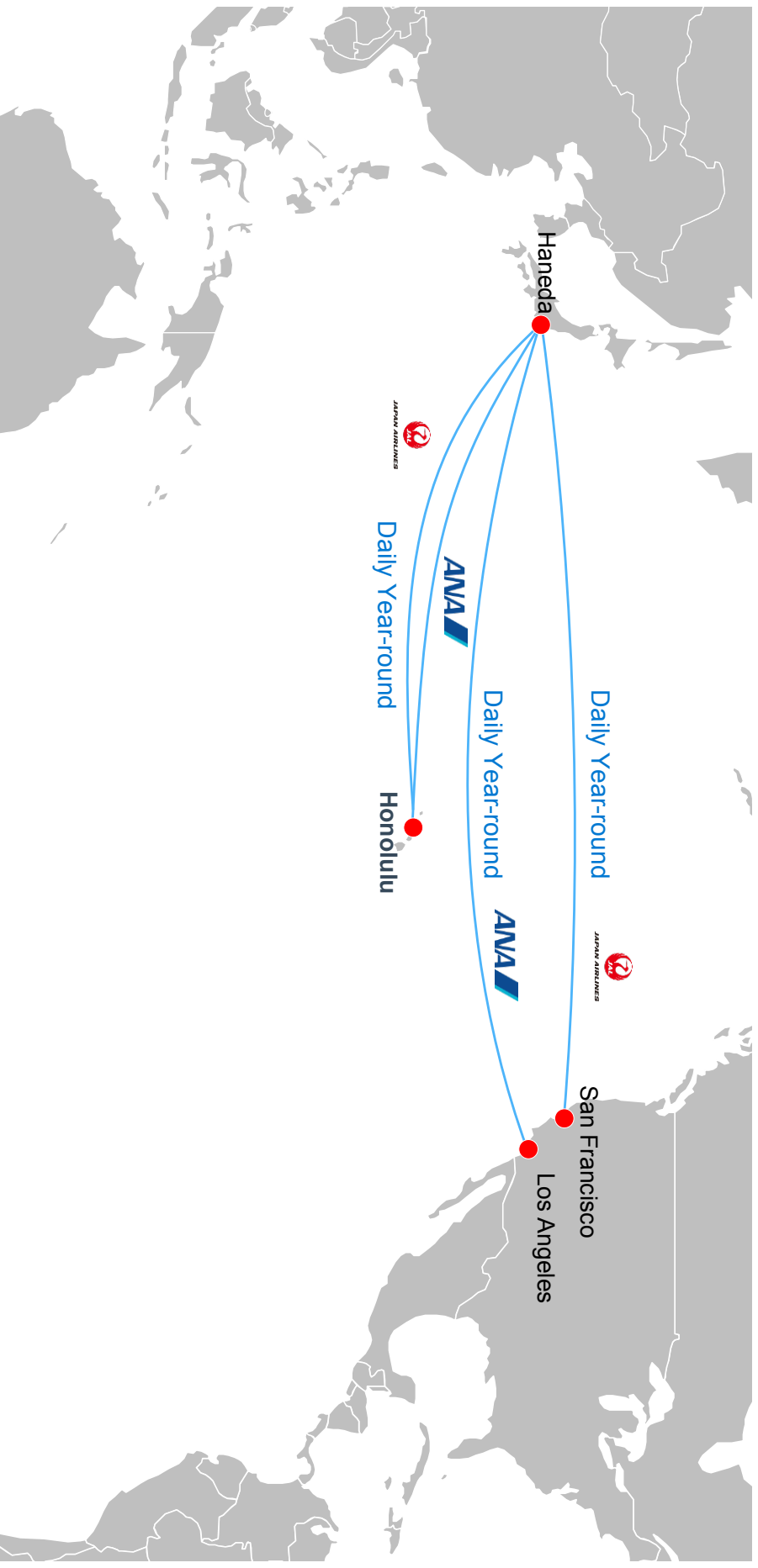
“Seasonality” Is an Excuse Concocted by Delta for Ceasing Seattle-Haneda Service; It Is Not a Reality

No Other U.S. Airline Serving Haneda Operates a “Seasonal” Service -> **No Seasonality**



“Seasonality” Is an Excuse Concocted by Delta for Ceasing Seattle-Haneda Service; It Is Not a Reality

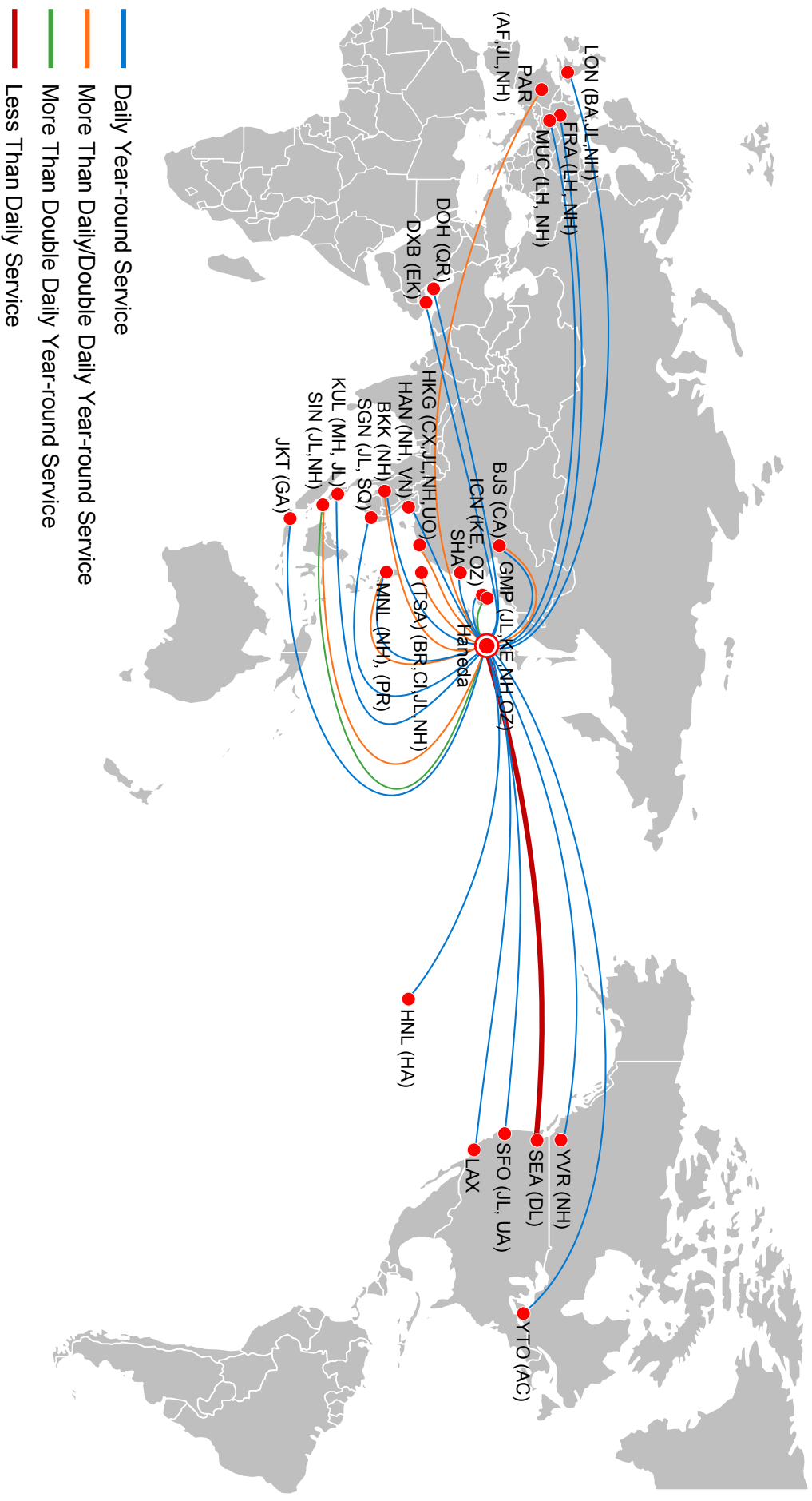
No Japanese Airline Operates a “Seasonal” Service On Its U.S.- Haneda Routes -> **No Seasonality**



Note: ANA Honolulu service operated by Air Japan
Source: 2015 OAG flight schedules

“Seasonality” Is an Excuse Concocted by Delta for Ceasing Seattle-Haneda Service; It Is Not a Reality

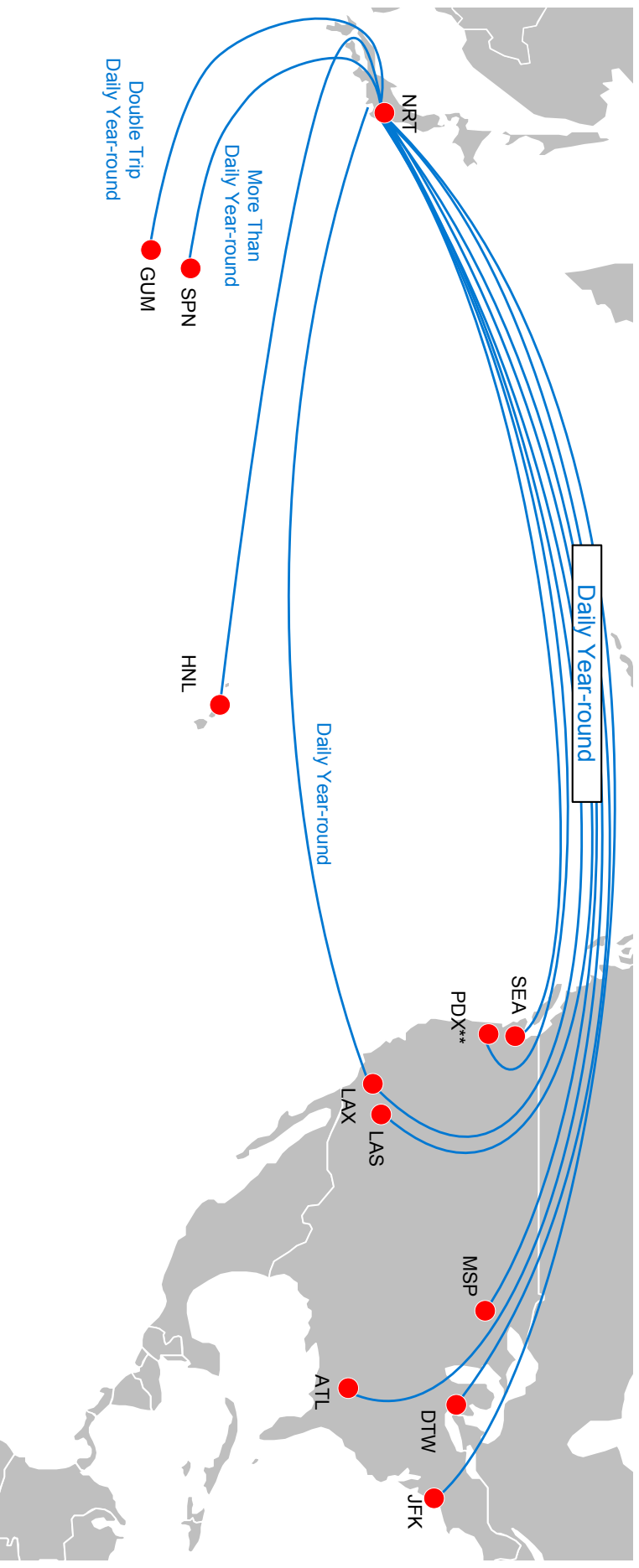
All Carriers Serving Haneda Have Year-round Schedules -> **No Seasonality**



Source: 2015 OAG flight schedules

“Seasonality” Is an Excuse Concocted by Delta for Ceasing Seattle-Haneda Service; It Is Not a Reality

Delta Operates a Year-round Service on Its U.S.–Narita Routes and all Routes Daily Except Portland-> *No Seasonal Service*

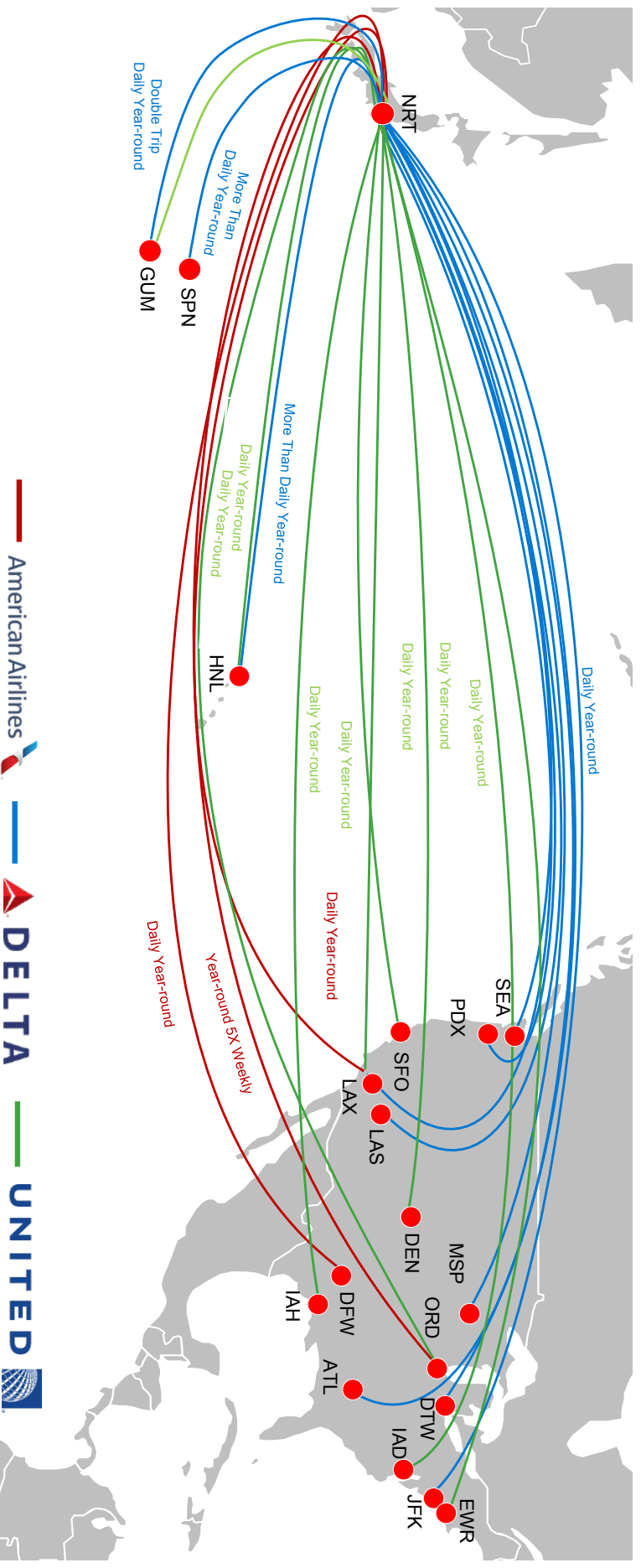


Note: DL Portland service operates less than daily in some months, but never less than 21 times per month (approx. 5 times weekly) and never any months with no service
Source: OAG flight schedules

#LetAFlyHaneda

“Seasonality” Is an Excuse Concocted by Delta for Ceasing Seattle-Haneda Service; It Is Not a Reality

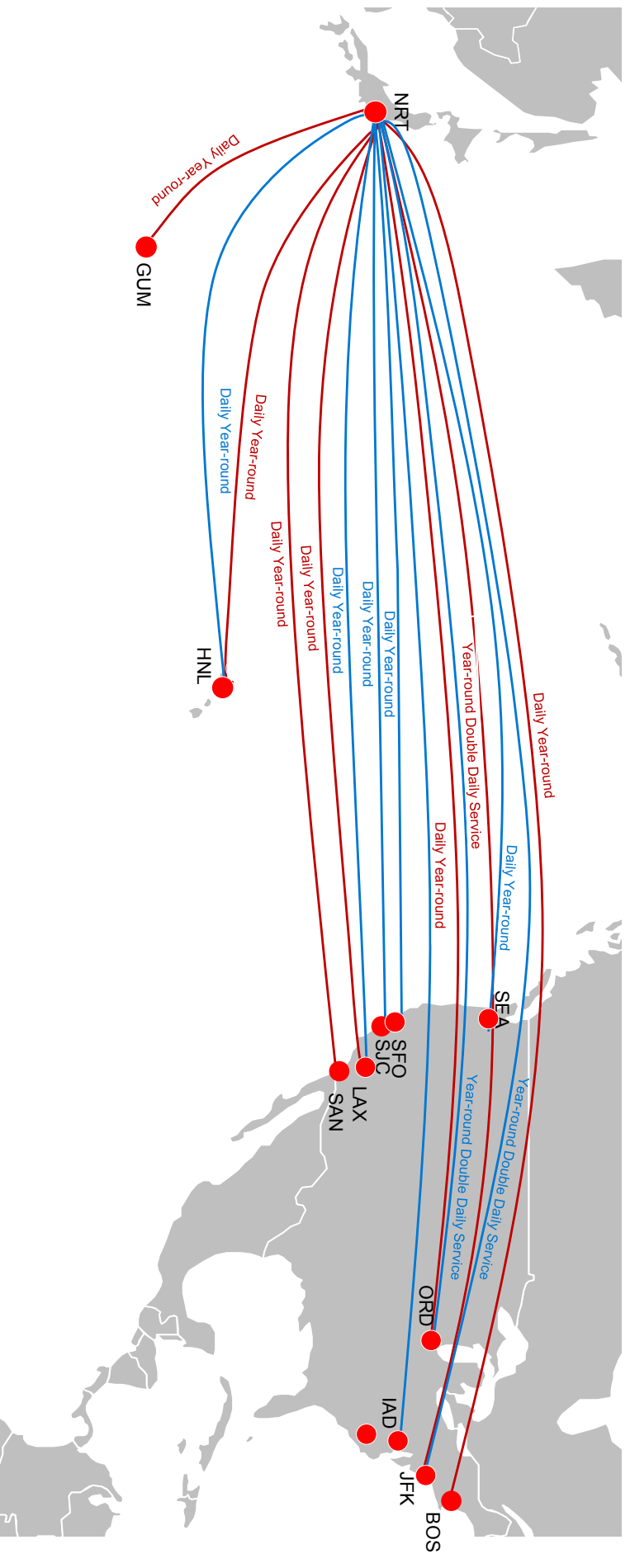
All U.S. Carriers Operating U.S.–Narita Services Have Year-round Services -> **No Seasonal Services**



Note: DL Portland service operates less than daily in some months, but never less than 21 times per month (approx. 5 times weekly) and never any months with no service
Source: OAG flight schedules

“Seasonality” Is an Excuse Concocted by Delta for Ceasing Seattle-Haneda Service; It Is Not a Reality

All Japanese Carriers Operating U.S.–Narita Services Have
Year-round Services -> **No Seasonal Services**



Series 400
American's LAX-HND Proposal Maximizes
the Public Benefits

Allocating to American a Haneda Slot Pair to Operate the Los Angeles-Haneda Route Maximizes the Public Benefits of a Scarce Resource

Benefit	AA LAX-HND	DL SEA-HND
New U.S. Carrier Service to Haneda (inter-carrier competition)	✓	✗
New U.S. Carrier Competitor at LAX (intra-gateway competition)	✓	✗
New (first-time) Three-Way Alliance Competition at LAX (Largest Continental U.S.-Tokyo O&D Market)	✓	✗
New Competitor/Competition for UA at SFO (inter-gateway competition)	✓	✗
Year-Round Service (No "Seasonality")	✓	✗
Daily Service (No weeks, months, without service)	✓	✗
Provides More Seats to Haneda	✓	✗
Significant Cargo Capacity	✓	✗
Access to Haneda for AA Passengers	✓	✗

Series 500 Connecting Flight Information

Connecting Detail--Summer Westbound (LAX-HND)

To LAX:

Mktg AI	Flight	Orig	Dep Time	Arr Time	Equip	Seats	Elapsed Mins (to LAX)	Connection Time Mins	LAX-HND Flight Time Mins	Total Elapsed Mins (to HND)
AA	2614	ABQ	601	654	CRJ	50	113	606	720	1,489
AA	5399	SAT	610	705	CR9	79	175	595	720	1,569
AA	216	GRU	2230	710	777	247	755	680	720	2,402
AA	5368	PHX	600	722	CR9	76	82	668	720	1,546
AA	5395	IAH	610	731	CR9	79	201	659	720	1,659
AA	2617	TUS	604	735	CRJ	50	91	655	720	1,516
AA	2600	SJC	630	752	CRJ	50	82	638	720	1,490
AA	5398	OKC	700	754	CR9	76	174	636	720	1,606
AA	183	AUS	700	807	738	150	187	623	720	1,680
AA	2611	SLC	710	808	CRJ	50	118	622	720	1,510
AA	2604	SMF	640	812	CRJ	50	92	618	720	1,480
AA	2401	DFW	700	819	763	218	199	611	720	1,748
AA	5372	DEN	701	820	CR9	76	139	610	720	1,545
AA	1232	SFO	700	828	738	150	88	602	720	1,560
AA	169	LAS	730	840	M83	140	70	590	720	1,520
AA	365	ATL	700	841	319	128	281	589	720	1,718
AA	1361	BNA	630	854	738	150	264	576	720	1,710
US	491	PHX	728	855	752	190	87	575	720	1,572
AA	171	JFK	600	900	32B	102	360	570	720	1,752
AA	2608	MRY	750	904	CRJ	50	74	566	720	1,410
AA	2615	FAT	805	919	CRJ	50	74	551	720	1,395
AA	2599	EUG	700	920	CRJ	50	140	550	720	1,460
AA	1039	BOS	600	924	738	150	384	546	720	1,800
AA	2627	SAN	845	930	CRJ	50	45	540	720	1,355
AA	2605	SAF	830	933	CRJ	50	123	537	720	1,430
AA	1249	SFO	810	947	738	150	97	523	720	1,490
AA	1403	MIA	720	947	777	247	327	523	720	1,817
AA	1047	ORD	730	957	32B	181	267	513	720	1,681
US	417	CLT	750	957	321	187	307	513	720	1,727

Note: All flights operate daily

Source: OAG flight schedules for August 15, 2015, as of December 24, 2014



FROM:
LAX-HND
 Flight 125
 Departure:
 1830
 Flight Time:
 12:00
 MCT
 00:45

Connecting Detail--Summer Westbound (LAX-HND) (cont.)

To LAX:

Mktg AI	Flight	Orig	Dep Time	Arr Time	Equip	Seats	Elapsed Mins (to LAX)	Connection Time Mins	LAX-HND Flight Time Mins	Total Elapsed Mins (to HND)
AA	9	JFK	700	958	32B	102	358	512	720	1,692
AA	2442	DFW	838	1000	757	182	202	510	720	1,614
AA	1379	YYZ	745	1005	738	160	320	505	720	1,705
AA	5324	VVR	700	1007	CR9	79	187	503	720	1,489
AA	5359	YEG	830	1009	CR9	79	159	501	720	1,459
US	797	PHL	735	1016	321	187	341	494	720	1,742
AA	1351	TPA	835	1028	738	150	293	482	720	1,645
AA	2419	DFW	905	1030	763	218	205	480	720	1,623
AA	2625	RNO	900	1033	CRJ	50	93	477	720	1,340
AA	2606	SAN	1004	1050	CRJ	50	46	460	720	1,276
AA	1567	STL	900	1102	M83	140	242	448	720	1,550
AA	33	JFK	800	1105	32B	102	365	445	720	1,632
AA	28	MCO	900	1106	738	150	306	444	720	1,620
AA	53	DCA	830	1114	738	150	344	436	720	1,650
AA	25	BOS	800	1119	738	150	379	431	720	1,680
AA	263	IAD	850	1123	738	150	333	427	720	1,630
AA	5346	SLC	1030	1124	CR9	76	114	426	720	1,336
AA	312	SJD	1000	1133	738	150	153	417	720	1,440
AA	2357	PBI	840	1135	738	160	355	415	720	1,650
AA	5400	SJC	1020	1144	CR9	76	84	406	720	1,286
AA	2621	TUS	1012	1145	CRJ	50	93	405	720	1,268
US	1700	PHX	1015	1145	321	187	90	405	720	1,402
AA	2584	RNO	1015	1147	CRJ	50	92	403	720	1,265
AA	3238	ASE	1040	1148	CR7	63	128	402	720	1,313
AA	1081	ORD	915	1148	32B	181	273	402	720	1,576
AA	2424	DFW	1025	1150	32B	181	205	400	720	1,506

FROM:
LAX-HND
 Flight 125
 Departure:
 1830
 Flight Time:
 12:00
 MCT
 00:45

Note: All flights operate daily

Source: OAG flight schedules for August 15, 2015, as of December 24, 2014

Connecting Detail--Summer Westbound (LAX-HND) (cont.)

To LAX:

Mktg AI	Flight	Orig	Dep Time	Arr Time	Equip	Seats	Elapsed Mins (to LAX)	Connection Time Mins	LAX-HND Flight Time Mins	Total Elapsed Mins (to HND)
AA	5404	SFO	1025	1155	CR9	79	90	395	720	1,284
AA	2580	SAN	1115	1200	CRJ	50	45	390	720	1,205
US	639	CLT	950	1200	321	187	310	390	720	1,607
AA	295	MIA	925	1202	32B	181	337	388	720	1,626
AA	2577	SMF	1025	1205	CRJ	50	100	385	720	1,255
US	727	PIT	1000	1205	319	124	305	385	720	1,534
AA	2425	DFW	1045	1207	763	218	202	383	720	1,523
AA	1	JFK	900	1210	32B	102	370	380	720	1,572
US	855	PHL	1000	1249	321	187	349	341	720	1,597
AA	2437	ATL	1110	1251	319	128	281	339	720	1,468
AA	2589	FAT	1140	1254	CRJ	50	74	336	720	1,180
AA	1155	ORD	1030	1258	32B	181	268	332	720	1,501
AA	255	JFK	1000	1302	32B	102	362	328	720	1,512
AA	1126	LAS	1155	1309	738	150	74	321	720	1,265
AA	2618	ABQ	1215	1314	CRJ	50	119	316	720	1,205
AA	952	AUS	1205	1315	M83	140	190	315	720	1,365
AA	5407	SAT	1230	1322	CR9	79	172	308	720	1,279
AA	2624	SAN	1246	1330	CRJ	50	44	300	720	1,114
AA	5419	PHX	1210	1331	CR9	76	81	299	720	1,176
AA	315	BOS	1015	1331	738	150	376	299	720	1,545
AA	2423	DFW	1211	1334	763	218	203	296	720	1,437
AA	2455	SFO	1205	1335	738	150	90	295	720	1,255
AA	5432	ELP	1235	1335	CR9	76	120	295	720	1,211
AA	5373	DEN	1220	1340	CR9	76	140	290	720	1,226
AA	19	JFK	1100	1401	32B	102	361	269	720	1,452
AA	2596	SJC	1245	1406	CRJ	50	81	264	720	1,115
AA	5358	IAH	1300	1417	CR9	79	197	253	720	1,249
AA	1063	ORD	1210	1437	32B	181	267	233	720	1,401

FROM:
LAX-HND
 Flight 125
 Departure:
 1830
 Flight Time:
 12:00
 MCT
 00:45

Note: All flights operate daily

Source: OAG flight schedules for August 15, 2015, as of December 24, 2014

Connecting Detail--Summer Westbound (LAX-HND) (cont.)

To LAX:

Mktg AI	Flight	Orig	Dep Time	Arr Time	Equip	Seats	Elapsed Mins (to LAX)	Connection Time Mins	LAX-HND Flight Time Mins	Total Elapsed Mins (to HND)
AA	2575	RDM	1235	1446	CRJ	50	131	224	720	1,125
AA	5377	SFO	1325	1455	CR9	79	90	215	720	1,104
AA	215	LAS	1340	1500	738	160	80	210	720	1,170
AA	2607	SAN	1415	1501	CRJ	50	46	209	720	1,025
AA	5394	YVR	1200	1507	CR9	79	187	203	720	1,189
AA	2479	DFW	1350	1512	757	182	202	198	720	1,302
AA	2629	SLC	1420	1514	CRJ	50	114	196	720	1,080
AA	139	MIA	1235	1516	738	150	341	194	720	1,405
US	2023	PHX	1355	1521	321	187	86	189	720	1,182
AA	3	JFK	1230	1525	32B	102	355	185	720	1,362
AA	237	SJD	1353	1529	M83	140	156	181	720	1,197
AA	2593	TUS	1357	1530	CRJ	50	93	180	720	1,043
AA	1258	STL	1345	1545	M83	140	240	165	720	1,265
AA	2597	SMF	1420	1552	CRJ	50	92	158	720	1,020
AA	5425	AUS	1430	1555	CR9	79	205	155	720	1,159
AA	2609	RNO	1430	1606	CRJ	50	96	144	720	1,010
AA	2610	SAN	1525	1612	CRJ	50	47	138	720	955
AA	1143	SFO	1440	1612	738	150	92	138	720	1,100
AA	2582	FAT	1515	1631	CRJ	50	76	119	720	965
AA	2384	LAS	1515	1631	32B	181	76	119	720	1,096
US	538	PHL	1400	1640	321	187	340	110	720	1,357
AA	1060	ORD	1414	1643	32B	181	269	107	720	1,277
AA	287	MIA	1416	1652	738	150	336	98	720	1,304
AA	2459	DFW	1535	1657	763	218	202	93	720	1,233
AA	2591	EUG	1450	1708	CRJ	50	138	82	720	990
AA	1261	AUS	1600	1709	738	150	189	81	720	1,140
AA	2613	SAN	1640	1722	CRJ	50	42	68	720	880
AA	5392	SJC	1615	1739	CR9	76	84	51	720	931
AA	5381	OKC	1645	1742	CR9	79	177	48	720	1,024
AA	5356	SFO	1620	1750	CR9	79	90	40	720	929
AA	5387	DEN	1630	1752	CR9	79	142	38	720	979

Note: All flights operate daily

Source: OAG flight schedules for August 15, 2015, as of December 24, 2014

FROM:
LAX-HND
 Flight 125
 Departure:
 1830
 Flight Time:
 12:00
 MCT
 00:45

Connecting Detail--Summer Eastbound (HND-LAX)

From LAX:

**FROM:
 HND-LAX**
 Flight 126
 Arrival:
 18:30
 Flight Time:
 10:30
 MCT
 1:30



Mktg AI	Flight	Dest	Dep Time	Arr Time	Equip	Seats	Elapsed Mins (LAX to xxx)	Connection Time Mins	HND-LAX Flight Time Mins	Total Elapsed Mins (from HND)
AA	2622	FAT	2000	2104	CRJ	50	64	90	630	784
AA	5378	DEN	2015	2326	CR9	76	131	105	630	866
AA	5396	YVR	2015	2255	CR9	79	160	105	630	895
AA	192	BOS	2050	0519	738	150	329	140	630	1,099
AA	2623	MRY	2100	2211	CRJ	50	71	150	630	851
AA	2616	SMF	2100	2220	CRJ	50	80	150	630	860
AA	2465	SFO	2100	2222	738	150	82	150	630	862
AA	2628	EUG	2100	2257	CRJ	50	117	150	630	897
AA	1554	LAS	2101	2212	M83	140	71	151	630	852
US	762	PHX	2137	2304	321	187	87	187	630	904
AA	2620	RNO	2150	2309	CRJ	50	79	200	630	909
AA	204	MCO	2150	0539	738	150	289	200	630	1,119
AA	2471	MIA	2150	0554	738	150	304	200	630	1,134
AA	2579	SJC	2155	2301	CRJ	50	66	205	630	901
AA	10	JFK	2155	0619	32B	102	324	205	630	1,159
AA	74	IAD	2200	0603	738	150	303	210	630	1,143
US	707	PHL	2215	0620	321	187	305	285	630	1,220
AA	1514	YYZ	2245	0635	738	160	290	255	630	1,175
AA	1360	BNA	2330	0530	738	150	240	300	630	1,170
AA	30	JFK	2330	0800	32B	102	330	300	630	1,260
AA	1358	TPA	2335	0727	738	150	292	305	630	1,227
AA	219	ORD	2359	0602	738	160	243	329	630	1,202
AA	58	MIA	2359	0802	32B	181	303	329	630	1,262
AA	2366	PBI	0005	0745	738	160	280	335	630	1,245
AA	1116	ATL	0015	0734	319	128	259	345	630	1,234
US	1832	CLT	0020	0805	321	187	285	410	630	1,325
US	591	PHL	0030	0843	321	187	313	420	630	1,363
AA	1592	MIA	0030	0832	738	160	302	360	630	1,292
AA	1113	ORD	0040	0643	32B	181	243	370	630	1,243
AA	2400	DFW	0055	0557	763	218	182	385	630	1,197
AA	2406	DFW	0059	0602	738	160	183	389	630	1,202

Note: All flights operate daily except for flight 762 to Phoenix which operates 4X per week.
 Source: OAG flight schedules for August 15, 2015, as of December 24, 2014

Connecting Detail–Winter Westbound (LAX-HND)

To LAX:

Mktg AI	Flight	Orig	Dep Time	Arr Time	Equip	Seats	Elapsed Mins (to LAX)	Connection Time Mins	LAX-HND Flight Time Mins	Total Elapsed Mins (to HND)
AA	2614	ABQ	601	654	CRJ	50	113	606	750	1,469
AA	5399	SAT	610	705	CR9	79	175	595	750	1,520
AA	216	GRU	2230	710	777	247	760	590	750	2,100
AA	5368	PHX	600	722	CR9	76	82	578	750	1,410
AA	2603	ELP	605	722	CRJ	50	137	578	750	1,465
AA	5395	IAH	610	731	CR9	79	201	569	750	1,520
AA	2617	TUS	604	735	CRJ	50	91	565	750	1,406
AA	2600	SJC	630	752	CRJ	50	82	548	750	1,380
AA	5398	OKC	700	754	CR9	76	174	546	750	1,470
AA	183	AUS	700	807	738	150	187	533	750	1,470
AA	2611	SLC	710	808	CRJ	50	118	532	750	1,400
AA	2604	SMF	640	812	CRJ	50	92	528	750	1,370
AA	2401	DFW	700	819	763	218	199	521	750	1,470
AA	5372	DEN	701	820	CR9	76	139	520	750	1,409
AA	1232	SFO	700	828	738	150	88	512	750	1,350
AA	169	LAS	730	840	M83	140	70	500	750	1,320
AA	365	ATL	700	841	319	128	281	499	750	1,530
AA	1361	BNA	630	854	738	150	264	486	750	1,500
US	491	PHX	728	855	752	190	87	485	750	1,322
AA	171	JFK	600	900	32B	102	360	480	750	1,590
AA	2608	MRY	750	904	CRJ	50	74	476	750	1,300
AA	2615	FAT	805	919	CRJ	50	74	461	750	1,285
AA	2599	EUG	700	920	CRJ	50	140	460	750	1,350
AA	2627	SAN	845	930	CRJ	50	45	450	750	1,245
AA	2605	SAF	830	933	CRJ	50	123	447	750	1,320
AA	1249	SFO	810	947	738	150	97	433	750	1,280
AA	1403	MIA	720	947	777	247	327	433	750	1,510
US	417	CLT	750	957	321	187	307	423	750	1,480
AA	1047	ORD	730	957	32B	181	267	423	750	1,440
AA	9	JFK	700	958	32B	102	358	422	750	1,530
AA	2442	DFW	838	1000	757	182	202	420	750	1,372
AA	5324	VVR	700	1007	CR9	79	187	413	750	1,350
AA	5359	YEG	830	1009	CR9	79	159	411	750	1,320

FROM:
LAX-HND
 Flight 125
 Departure:
 1700
 Flight Time:
 12:30
 MCT
 00:45

Note: All flights operate daily
 Source: OAG flight schedules for March 19, 2015, as of December 24, 2014

Connecting Detail—Winter Westbound (LAX-HND)(cont.)

To LAX:

Mktg AI	Flight	Orig	Dep Time	Arr Time	Equip	Seats	Elapsed Mins (to LAX)	Connection Time Mins	LAX-HND Flight Time Mins	Total Elapsed Mins (to HND)
US	797	PHL	735	1016	321	187	341	404	750	1,495
AA	1351	TPA	835	1028	738	150	293	392	750	1,435
AA	2419	DFW	905	1030	763	218	205	390	750	1,345
AA	2625	RNO	900	1033	CRJ	50	93	387	750	1,230
AA	1439	BOS	700	1046	738	150	406	374	750	1,530
AA	2606	SAN	1004	1050	CRJ	50	46	370	750	1,166
AA	1567	STL	900	1102	M83	140	242	358	750	1,350
AA	33	JFK	800	1105	32B	102	365	355	750	1,470
AA	28	MCO	900	1106	738	150	306	354	750	1,410
AA	53	DCA	830	1114	738	150	344	346	750	1,440
AA	263	IAD	850	1123	738	150	333	337	750	1,420
AA	5346	SLC	1030	1124	CR9	76	114	336	750	1,200
AA	2357	PBI	840	1135	738	160	355	325	750	1,430
AA	5400	SJC	1020	1144	CR9	76	84	316	750	1,150
US	1700	PHX	1015	1145	321	187	90	315	750	1,155
AA	2621	TUS	1012	1145	CRJ	50	93	315	750	1,158
AA	2584	RNO	1015	1147	CRJ	50	92	313	750	1,155
AA	1081	ORD	915	1148	32B	181	273	312	750	1,335
AA	2424	DFW	1025	1150	32B	181	205	310	750	1,265
AA	5404	SFO	1025	1155	CR9	79	90	305	750	1,145
US	639	CLT	950	1200	321	187	310	300	750	1,360
AA	2580	SAN	1115	1200	CRJ	50	45	300	750	1,095
AA	295	MIA	925	1202	32B	181	337	298	750	1,385
US	727	PIT	1000	1205	319	124	305	295	750	1,350
AA	2577	SMF	1025	1205	CRJ	50	100	295	750	1,145
AA	2425	DFW	1045	1207	763	218	202	293	750	1,245
AA	1	JFK	900	1210	32B	102	370	290	750	1,410
AA	25	BOS	900	1219	738	150	379	281	750	1,410
US	855	PHL	1000	1249	321	187	349	251	750	1,350
AA	2577	SMF	1025	1205	CRJ	50	100	295	750	1,145
AA	2425	DFW	1045	1207	763	218	202	293	750	1,245
AA	1	JFK	900	1210	32B	102	370	290	750	1,410
AA	25	BOS	900	1219	738	150	379	281	750	1,410



FROM:
LAX-HND
 Flight 125
 Departure:
 1700
 Flight Time:
 12:30
 MCT
 00:45

Note: All flights operate daily
 Source: OAG flight schedules for March 19, 2015, as of December 24, 2014

Connecting Detail—Winter Westbound (LAX-HND)(cont.)

To LAX:

Mktg AI	Flight	Orig	Dep Time	Arr Time	Equip	Seats	Elapsed Mins (to LAX)	Connection Time Mins	LAX-HND Flight Time Mins	Total Elapsed Mins (to HND)
US	855	PHL	1000	1249	321	187	349	251	750	1,350
AA	2437	ATL	1110	1251	319	128	281	249	750	1,280
AA	2589	FAT	1140	1254	CRJ	50	74	246	750	1,070
AA	1155	ORD	1030	1258	32B	181	268	242	750	1,260
AA	255	JFK	1000	1302	32B	102	362	238	750	1,350
AA	1126	LAS	1155	1309	738	150	74	231	750	1,055
AA	2618	ABQ	1215	1314	CRJ	50	119	226	750	1,095
AA	952	AUS	1205	1315	M83	140	190	225	750	1,165
AA	5407	SAT	1230	1322	CR9	79	172	218	750	1,140
AA	2624	SAN	1246	1330	CRJ	50	44	210	750	1,004
AA	5419	PHX	1210	1331	CR9	76	81	209	750	1,040
AA	2423	DFW	1211	1334	763	218	203	206	750	1,159
AA	2455	SFO	1205	1335	738	150	90	205	750	1,045
AA	5432	ELP	1235	1335	CR9	76	120	205	750	1,075
AA	5373	DEN	1220	1340	CR9	76	140	200	750	1,090
AA	19	JFK	1100	1401	32B	102	361	179	750	1,290
AA	2596	SJC	1245	1406	CRJ	50	81	174	750	1,005
AA	5358	IAH	1300	1417	CR9	79	197	163	750	1,110
AA	1063	ORD	1210	1437	32B	181	267	143	750	1,160
AA	2575	RDM	1235	1446	CRJ	50	131	134	750	1,015
AA	5377	SFO	1325	1455	CR9	79	90	125	750	965
AA	215	LAS	1340	1500	738	160	80	120	750	950
AA	2607	SAN	1415	1501	CRJ	50	46	119	750	915
AA	5394	YVR	1200	1507	CR9	79	187	113	750	1,050
AA	2479	DFW	1350	1512	757	182	202	108	750	1,060
AA	2629	SJC	1420	1514	CRJ	50	114	106	750	970
AA	139	MIA	1235	1516	738	150	341	104	750	1,195
US	2023	PHX	1355	1521	321	187	86	99	750	935
AA	3	JFK	1230	1525	32B	102	355	95	750	1,200
AA	237	SJD	1353	1529	738	160	156	91	750	997
AA	2593	TUS	1357	1530	CRJ	50	93	90	750	933
AA	1258	STL	1345	1545	M83	140	240	75	750	1,065
AA	2597	SMF	1420	1552	CRJ	50	92	68	750	910
AA	2609	RNO	1430	1606	CRJ	50	96	54	750	900
AA	2610	SAN	1525	1612	CRJ	50	47	48	750	845
AA	1143	SFO	1440	1612	738	150	92	48	750	890



FROM:
LAX-HND
 Flight 125
 Departure:
 1700
 Flight Time:
 12:30
 MCT
 00:45

Note: All flights operate daily
 Source: OAG flight schedules for March 19, 2015, as of December 24, 2014

Connecting Detail—Winter Eastbound (HND-LAX)

From LAX:

FROM:
HND-LAX
 Flight 126
 Arrival:
 17:00
 Flight Time:
 10:00
 MCT
 1:30



Mktg AI	Flight	Dest	Dep Time	Arr Time	Equip	Seats	Elapsed Mins (LAX to xxx)	Connection Time Mins	HND-LAX Flight Time Mins	Total Elapsed Mins (from HND)
AA	5356	SJC	1840	1946	CR9	79	66	100	600	766
AA	5381	SAT	1840	2330	CR9	79	170	100	600	870
AA	5387	IAH	1840	2349	CR9	79	189	100	600	889
AA	5427	PHX	1845	2011	CR9	76	86	105	600	791
AA	215	GRU	1850	1045	777	247	715	110	600	1,425
AA	2626	SLC	1855	2138	CRJ	50	103	115	600	818
AA	182	AUS	1855	2351	738	150	176	115	600	891
AA	2619	SAN	1905	1952	CRJ	50	47	125	600	772
AA	2493	LAS	1915	2029	738	150	74	135	600	809
AA	2590	TUS	1935	2104	CRJ	50	89	155	600	844
AA	5392	PHX	1940	2108	CR9	76	88	160	600	848
AA	2622	FAT	2000	2104	CRJ	50	64	180	600	844
AA	2588	ELP	2005	2300	CRJ	50	115	185	600	900
AA	5378	DEN	2015	2326	CR9	76	131	195	600	926
AA	5396	YVR	2015	2255	CR9	79	160	195	600	955
AA	192	BOS	2050	0519	738	150	329	230	600	1,159
AA	2623	MRY	2100	2211	CRJ	50	71	240	600	911
AA	2616	SMF	2100	2220	CRJ	50	80	240	600	920
AA	2465	SFO	2100	2222	738	150	82	240	600	922
AA	2628	EUG	2100	2257	CRJ	50	117	240	600	957
AA	1554	LAS	2101	2212	M83	140	71	241	600	912

Note: All flights operate daily
 Source: OAG flight schedules for March 19, 2015, as of December 24, 2014

Connecting Detail—Winter Eastbound (HND-LAX)(cont.)

From LAX:

Mktg Al	Flight	Dest	Dep Time	Arr Time	Equip	Seats	Elapsed Mins (LAX to xxx)	Connection Time Mins	HND-LAX Flight Time Mins	Total Elapsed Mins (from HND)
AA	2620	RNO	2150	2309	CRJ	50	79	290	600	969
AA	204	MCO	2150	0539	738	150	289	290	600	1,179
AA	2471	MIA	2150	0554	738	150	304	290	600	1,194
AA	2579	SJC	2155	2301	CRJ	50	66	295	600	961
AA	10	JFK	2155	0619	32B	102	324	295	600	1,219
AA	74	IAD	2200	0603	738	150	303	300	600	1,203
US	707	PHL	2215	0620	321	187	305	285	600	1,190
AA	1360	BNA	2330	0530	738	150	240	390	600	1,230
AA	30	JFK	2330	0800	32B	102	330	390	600	1,320
AA	1358	TPA	2335	0727	738	150	292	395	600	1,287
AA	219	ORD	2359	0602	738	160	243	419	600	1,262
AA	58	MIA	2359	0802	32B	181	303	419	600	1,322
AA	2366	PBI	0005	0745	738	160	280	425	600	1,305
AA	1116	ATL	0015	0734	319	128	259	435	600	1,294
US	1832	CLT	0020	0805	321	187	285	410	600	1,295
US	591	PHL	0030	0843	321	187	313	420	600	1,333
AA	1592	MIA	0030	0832	738	160	302	450	600	1,352
AA	1113	ORD	0040	0643	32B	181	243	460	600	1,303
AA	2400	DFW	0055	0557	763	218	182	475	600	1,257
AA	2406	DFW	0059	0602	738	160	183	479	600	1,262

**FROM:
HND-LAX**
 Flight 126
 Arrival:
 17:00
 Flight Time:
 10:00
 MCT
 1:30

Note: All flights operate daily
 Source: OAG flight schedules for March 19, 2015, as of December 24, 2014

Cargo Capacity for Flights Connecting to American's LAX-HND Service at 100% Load Factor

Per Flight

100% Passenger Load Factor

Equipment	Seats	Orig	Dest	Season	Month	Payload lbs	Pax Demand (%LF)	Equivalent Pax Count	Pax & Bags Payload-lbs	Cargo Capacity Based on Pax Demand
B777-223ER	247	INTL	LAX	Winter	Dec	101,800	100	247	59,280	42,520
					Jan	101,800	100	247	59,280	42,520
					Feb	101,800	100	247	59,280	42,520
				Spring	Mar	101,800	100	247	58,045	43,755
					Apr	101,800	100	247	58,045	43,755
					May	101,800	100	247	58,045	43,755
				Summer	Jun	101,800	100	247	58,045	43,755
					Jul	101,800	100	247	58,045	43,755
					Aug	101,800	100	247	59,280	42,520
				Fall	Sep	101,800	100	247	59,280	42,520
					Oct	101,800	100	247	59,280	42,520
Nov	101,800	100	247		59,280	42,520				
Annual Average					101,800	100	247	58,663	43,138	
B767-323ER	225	INTL	LAX	Winter	Dec	80,700	100	225	54,000	26,700
					Jan	80,700	100	225	54,000	26,700
					Feb	80,700	100	225	54,000	26,700
				Spring	Mar	80,700	100	225	52,875	27,825
					Apr	80,700	100	225	52,875	27,825
					May	80,700	100	225	52,875	27,825
				Summer	Jun	80,700	100	225	52,875	27,825
					Jul	80,700	100	225	52,875	27,825
					Aug	80,700	100	225	52,875	27,825
				Fall	Sep	80,700	100	225	54,000	26,700
					Oct	80,700	100	225	54,000	26,700
Nov	80,700	100	225		54,000	26,700				
Annual Average					80,700	100	225	53,438	27,263	

Source: American Airlines

Cargo Capacity for Flights Connecting to American's LAX-HND Service at 100% Load Factor

Per Flight 100% Passenger Load Factor

<u>Equipment</u>	<u>Seats</u>	<u>Orig</u>	<u>Dest</u>	<u>Season</u>	<u>Month</u>	<u>Payload</u> lbs	<u>Pax Demand</u> (%LF)	<u>Equivalent</u> Pax Count	<u>Pax & Bags</u> Payload-lbs	<u>Cargo Capability</u> Based on Pax Demand
B757-223ER	174	US	LAX	Winter	Dec	48,200	100	174	41,760	6,440
					Jan	48,200	100	174	41,760	6,440
					Feb	48,200	100	174	41,760	6,440
				Spring	Mar	48,200	100	174	40,890	7,310
					Apr	48,200	100	174	40,890	7,310
					May	48,200	100	174	40,890	7,310
				Summer	Jun	48,200	100	174	40,890	7,310
					Jul	48,200	100	174	40,890	7,310
					Aug	48,200	100	174	40,890	7,310
				Fall	Sep	48,200	100	174	41,760	6,440
					Oct	48,200	100	174	41,760	6,440
Nov	48,200	100	174		41,760	6,440				
Annual Average					48,200	100	174	41,325	6,875	

Per Flight 100% Passenger Load Factor

<u>Equipment</u>	<u>Seats</u>	<u>US</u>	<u>LAX</u>	<u>Season</u>	<u>Month</u>	<u>Payload</u> lbs	<u>Pax Demand</u> (%LF)	<u>Equivalent</u> Pax Count	<u>Pax & Bags</u> Payload-lbs	<u>Cargo Capability</u> Based on Pax Demand
B767-223	169	US	LAX	Winter	Dec	61,700	100	169	40,560	21,140
					Jan	61,700	100	169	40,560	21,140
					Feb	61,700	100	169	40,560	21,140
				Spring	Mar	61,700	100	169	39,715	21,985
					Apr	61,700	100	169	39,715	21,985
					May	61,700	100	169	39,715	21,985
				Summer	Jun	61,700	100	169	39,715	21,985
					Jul	61,700	100	169	39,715	21,985
					Aug	61,700	100	169	39,715	21,985
				Fall	Sep	61,700	100	169	40,560	21,140
					Oct	61,700	100	169	40,560	21,140
Nov	61,700	100	169		40,560	21,140				
Annual Average					61,700	100	169	40,138	21,563	

Source: American Airlines

Cargo Capacity for Flights Connecting to American's LAX-HND Service at 100% Load Factor

Per Flight 100% Passenger Load Factor

Equipment	Seats	Orig	Dest	Season	Month	Payload lbs	Pax Demand (%LF)	Equivalent Pax Count	Pax & Bags Payload-lbs	Cargo Capacity
										Based on Pax Demand
B767-323ER	225	US	LAX	Winter	Dec	80,700	100	225	54,000	26,700
					Jan	80,700	100	225	54,000	26,700
					Feb	80,700	100	225	54,000	26,700
					Mar	80,700	100	225	52,875	27,825
					Apr	80,700	100	225	52,875	27,825
					May	80,700	100	225	52,875	27,825
				Spring	Jun	80,700	100	225	52,875	27,825
					Jul	80,700	100	225	52,875	27,825
					Aug	80,700	100	225	52,875	27,825
					Sep	80,700	100	225	54,000	26,700
					Oct	80,700	100	225	54,000	26,700
					Nov	80,700	100	225	54,000	26,700
Annual Average	80,700	100	225	53,438	27,263					

Per Flight 100% Passenger Load Factor

Equipment	Seats	Orig	Dest	Season	Month	Payload lbs	Pax Demand (%LF)	Equivalent Pax Count	Pax & Bags Payload-lbs	Cargo Capacity
										Based on Pax Demand
B757-223	188	US	LAX	Winter	Dec	49,200	100	188	45,120	4,080
					Jan	49,200	100	188	45,120	4,080
					Feb	49,200	100	188	45,120	4,080
					Mar	49,200	100	188	44,180	5,020
					Apr	49,200	100	188	44,180	5,020
					May	49,200	100	188	44,180	5,020
				Spring	Jun	49,200	100	188	44,180	5,020
					Jul	49,200	100	188	44,180	5,020
					Aug	49,200	100	188	44,180	5,020
					Sep	49,200	100	188	45,120	4,080
					Oct	49,200	100	188	45,120	4,080
					Nov	49,200	100	188	45,120	4,080
Annual Average	49,200	100	188	44,650	4,550					

Source: American Airlines

Cargo Capacity for Flights Connecting to American's LAX-HND Service at 100% Load Factor

Per Flight

100% Passenger Load Factor

Equipment	Seats	Orig	Dest	Season	Month	Payload lbs	Pax Demand (%LF)	Equivalent Pax Count	Pax & Bags Payload-lbs	Cargo Capacity
										Based on Pax Demand
MD80	140	US	LAX	Winter	Dec	36,900	100	140	33,600	3,300
					Jan	36,900	100	140	33,600	3,300
					Feb	36,900	100	140	33,600	3,300
				Spring	Mar	36,900	100	140	32,900	4,000
					Apr	36,900	100	140	32,900	4,000
					May	36,900	100	140	32,900	4,000
				Summer	Jun	36,900	100	140	32,900	4,000
					Jul	36,900	100	140	32,900	4,000
					Aug	36,900	100	140	32,900	4,000
				Fall	Sep	36,900	100	140	33,600	3,300
					Oct	36,900	100	140	33,600	3,300
					Nov	36,900	100	140	33,600	3,300
Annual Average					36,900	100	140	33,250	3,650	

Per Flight

100% Passenger Load Factor

737-823	Seats	US	LAX	Season	Month	Payload lbs	Pax Demand (%LF)	Equivalent Pax Count	Pax & Bags Payload-lbs	Cargo Capacity
										Based on Pax Demand
737-823	160	US	LAX	Winter	Dec	39,700	100	160	38,400	1,300
					Jan	39,700	100	160	38,400	1,300
					Feb	39,700	100	160	38,400	1,300
				Spring	Mar	39,700	100	160	37,600	2,100
					Apr	39,700	100	160	37,600	2,100
					May	39,700	100	160	37,600	2,100
				Summer	Jun	39,700	100	160	37,600	2,100
					Jul	39,700	100	160	37,600	2,100
					Aug	39,700	100	160	37,600	2,100
				Fall	Sep	39,700	100	160	38,400	1,300
					Oct	39,700	100	160	38,400	1,300
					Nov	39,700	100	160	38,400	1,300
Annual Average					39,700	100	160	38,000	1,700	

Source: American Airlines

Cargo Capacity for Flights Connecting to American's LAX-HND Service at 100% Load Factor

Per Flight

100% Passenger Load Factor

Equipment	Seats	Orig	Dest	Season	Month	Payload			Cargo Capacity Based on Pax Demand	
						lbs	Pax Demand (%LF)	Equivalent Pax Count		
E140	44	US	LAX	Winter	Dec	10,756	100	44	9,680	1,076
					Jan	10,756	100	44	9,680	1,076
					Feb	10,756	100	44	9,680	1,076
					Mar	10,756	100	44	9,680	1,076
					Apr	10,756	100	44	9,680	1,076
					May	10,756	100	44	9,680	1,076
				Summer	Jun	10,756	100	44	9,680	1,076
					Jul	10,756	100	44	9,680	1,076
					Aug	10,756	100	44	9,680	1,076
				Fall	Sep	10,756	100	44	9,680	1,076
					Oct	10,756	100	44	9,680	1,076
					Nov	10,756	100	44	9,680	1,076
Annual Average					10,756	100	44	9,680	1,076	
CRJ70	70	US	LAX	Winter	Dec	18,800	100	70	15,400	3,400
					Jan	18,800	100	70	15,400	3,400
					Feb	18,800	100	70	15,400	3,400
					Mar	18,800	100	70	15,400	3,400
					Apr	18,800	100	70	15,400	3,400
					May	18,800	100	70	15,400	3,400
				Spring	Jun	18,800	100	70	15,400	3,400
					Jul	18,800	100	70	15,400	3,400
					Aug	18,800	100	70	15,400	3,400
				Summer	Sep	18,800	100	70	15,400	3,400
					Oct	18,800	100	70	15,400	3,400
					Nov	18,800	100	70	15,400	3,400
Annual Average					18,800	100	70	15,400	3,400	

Cargo Capacity for Flights Connecting to American's LAX-HND Service at 80% Load Factor

Per Flight
80% Passenger Load Factor

Equipment	Seats	Orig	Dest	Season	Month	Payload lbs	Pax Demand (%LF)	Equivalent Pax Count	Pax & Bags Payload:lbs	Cargo Capacity
										Based on Pax Demand
B777-223ER	247	INTL	LAX	Winter	Dec	101,800	80	198	47,424	54,376
					Jan	101,800	80	198	47,424	54,376
					Feb	101,800	80	198	47,424	54,376
				Spring	Mar	101,800	80	198	46,436	55,364
					Apr	101,800	80	198	46,436	55,364
					May	101,800	80	198	46,436	55,364
				Summer	Jun	101,800	80	198	46,436	55,364
					Jul	101,800	80	198	46,436	55,364
					Aug	101,800	80	198	46,436	55,364
				Fall	Sep	101,800	80	198	47,424	54,376
					Oct	101,800	80	198	47,424	54,376
					Nov	101,800	80	198	47,424	54,376
Annual Average					101,800	80	198	46,930	54,870	
B767-323ER	225	INTL	LAX	Winter	Dec	80,700	80	180	43,200	37,500
					Jan	80,700	80	180	43,200	37,500
					Feb	80,700	80	180	43,200	37,500
				Spring	Mar	80,700	80	180	42,300	38,400
					Apr	80,700	80	180	42,300	38,400
					May	80,700	80	180	42,300	38,400
				Summer	Jun	80,700	80	180	42,300	38,400
					Jul	80,700	80	180	42,300	38,400
					Aug	80,700	80	180	42,300	38,400
				Fall	Sep	80,700	80	180	43,200	37,500
					Oct	80,700	80	180	43,200	37,500
					Nov	80,700	80	180	43,200	37,500
Annual Average					80,700	80	180	42,750	37,950	

Source: American Airlines

Cargo Capacity for Flights Connecting to American's LAX-HND Service at 80% Load Factor

Per Flight 80% Passenger Load Factor

Equipment	Seats	Orig	Dest	Season	Month	Payload lbs	Pax Demand (%LF)	Equivalent Pax Count	Pax & Bags Payload lbs	Cargo Capacity Based on Pax Demand
B757-223ER	174	US	LAX	Winter	Dec	48,200	80	139	33,408	14,792
					Jan	48,200	80	139	33,408	14,792
					Feb	48,200	80	139	33,408	14,792
				Spring	Mar	48,200	80	139	32,712	15,488
					Apr	48,200	80	139	32,712	15,488
					May	48,200	80	139	32,712	15,488
				Summer	Jun	48,200	80	139	32,712	15,488
					Jul	48,200	80	139	32,712	15,488
					Aug	48,200	80	139	32,712	15,488
				Fall	Sep	48,200	80	139	33,408	14,792
					Oct	48,200	80	139	33,408	14,792
Nov	48,200	80	139		33,408	14,792				
Annual Average					48,200	80	139	33,060	15,140	

Per Flight 80% Passenger Load Factor

Equipment	Seats	US	LAX	Season	Month	Payload lbs	Pax Demand (%LF)	Equivalent Pax Count	Pax & Bags Payload lbs	Cargo Capacity Based on Pax Demand
B767-223	169	US	LAX	Winter	Dec	61,700	80	135	32,448	29,252
					Jan	61,700	80	135	32,448	29,252
					Feb	61,700	80	135	32,448	29,252
				Spring	Mar	61,700	80	135	31,772	29,928
					Apr	61,700	80	135	31,772	29,928
					May	61,700	80	135	31,772	29,928
				Summer	Jun	61,700	80	135	31,772	29,928
					Jul	61,700	80	135	31,772	29,928
					Aug	61,700	80	135	31,772	29,928
				Fall	Sep	61,700	80	135	32,448	29,252
					Oct	61,700	80	135	32,448	29,252
Nov	61,700	80	135		32,448	29,252				
Annual Average					61,700	80	135	32,110	29,590	

Source: American Airlines

Cargo Capacity for Flights Connecting to American's LAX-HND Service at 80% Load Factor

Per Flight 80% Passenger Load Factor

Equipment	Seats	Orig	Dest	Season	Month	Payload lbs	Pax			Cargo Capacity Based on Pax Demand
							Demand (%LF)	Equivalent Pax Count	Pax & Bags Payload-lbs	
B767-323ER	225	US	LAX	Winter	Dec	80,700	80	180	43,200	37,500
					Jan	80,700	80	180	43,200	37,500
					Feb	80,700	80	180	43,200	37,500
				Spring	Mar	80,700	80	180	42,300	38,400
					Apr	80,700	80	180	42,300	38,400
					May	80,700	80	180	42,300	38,400
				Summer	Jun	80,700	80	180	42,300	38,400
					Jul	80,700	80	180	42,300	38,400
					Aug	80,700	80	180	42,300	38,400
				Fall	Sep	80,700	80	180	43,200	37,500
					Oct	80,700	80	180	43,200	37,500
Nov	80,700	80	180	43,200	37,500					
Annual Average					80,700	80	180	42,750	37,950	

Per Flight 80% Passenger Load Factor

Equipment	Seats	US	LAX	Season	Month	Payload lbs	Pax			Cargo Capacity Based on Pax Demand
							Demand (%LF)	Equivalent Pax Count	Pax & Bags Payload-lbs	
B757-223	188	US	LAX	Winter	Dec	49,200	80	150	36,096	13,104
					Jan	49,200	80	150	36,096	13,104
					Feb	49,200	80	150	36,096	13,104
				Spring	Mar	49,200	80	150	35,344	13,856
					Apr	49,200	80	150	35,344	13,856
					May	49,200	80	150	35,344	13,856
				Summer	Jun	49,200	80	150	35,344	13,856
					Jul	49,200	80	150	35,344	13,856
					Aug	49,200	80	150	35,344	13,856
				Fall	Sep	49,200	80	150	36,096	13,104
					Oct	49,200	80	150	36,096	13,104
Nov	49,200	80	150	36,096	13,104					
Annual Average					49,200	80	150	35,720	13,480	

Source: American Airlines

Cargo Capacity for Flights Connecting to American's LAX-HND Service at 80% Load Factor

Per Flight
 80% Passenger Load Factor

<u>Equipment</u>	<u>Seats</u>	<u>Orig</u>	<u>Dest</u>	<u>Season</u>	<u>Month</u>	<u>Payload lbs</u>	<u>Pax Demand (%LF)</u>	<u>Pax Equivalent Count</u>	<u>Pax & Bags Payload-lbs</u>	<u>Cargo Capacity Based on Pax Demand</u>
MD80	140	US	LAX	Winter	Dec	36,900	80	112	26,880	10,020
					Jan	36,900	80	112	26,880	10,020
					Feb	36,900	80	112	26,880	10,020
				Spring	Mar	36,900	80	112	26,320	10,580
					Apr	36,900	80	112	26,320	10,580
					May	36,900	80	112	26,320	10,580
				Summer	Jun	36,900	80	112	26,320	10,580
					Jul	36,900	80	112	26,320	10,580
					Aug	36,900	80	112	26,320	10,580
				Fall	Sep	36,900	80	112	26,880	10,020
					Oct	36,900	80	112	26,880	10,020
					Nov	36,900	80	112	26,880	10,020
Annual Average					36,900	80	112	26,600	10,300	

Per Flight
 80% Passenger Load Factor

<u>Equipment</u>	<u>Seats</u>	<u>US</u>	<u>LAX</u>	<u>Season</u>	<u>Month</u>	<u>Payload lbs</u>	<u>Pax Demand (%LF)</u>	<u>Pax Equivalent Count</u>	<u>Pax & Bags Payload-lbs</u>	<u>Cargo Capacity Based on Pax Demand</u>
737-823	160			Winter	Dec	39,700	80	128	30,720	8,980
					Jan	39,700	80	128	30,720	8,980
					Feb	39,700	80	128	30,720	8,980
				Spring	Mar	39,700	80	128	30,080	9,620
					Apr	39,700	80	128	30,080	9,620
					May	39,700	80	128	30,080	9,620
				Summer	Jun	39,700	80	128	30,080	9,620
					Jul	39,700	80	128	30,080	9,620
					Aug	39,700	80	128	30,080	9,620
				Fall	Sep	39,700	80	128	30,720	8,980
					Oct	39,700	80	128	30,720	8,980
					Nov	39,700	80	128	30,720	8,980
Annual Average					39,700	80	128	30,400	9,300	

Source: American Airlines

Cargo Capacity for Flights Connecting to American's LAX-HND Service at 80% Load Factor

Per Flight
 80% Passenger Load Factor

Equipment	Seats	Orig	Dest	Season	Month	Payload lbs	Pax Demand (%LF)	Equivalent Pax Count	Pax & Bags Payload-lbs	Cargo Capability
										Based on Pax Demand
E140	44	US	LAX	Winter	Dec	10,756	80	35	7,744	3,012
					Jan	10,756	80	35	7,744	3,012
					Feb	10,756	80	35	7,744	3,012
				Spring	Mar	10,756	80	35	7,744	3,012
					Apr	10,756	80	35	7,744	3,012
					May	10,756	80	35	7,744	3,012
				Summer	Jun	10,756	80	35	7,744	3,012
					Jul	10,756	80	35	7,744	3,012
					Aug	10,756	80	35	7,744	3,012
				Fall	Sep	10,756	80	35	7,744	3,012
					Oct	10,756	80	35	7,744	3,012
					Nov	10,756	80	35	7,744	3,012
Annual Average					10,756	80	35	7,744	3,012	
CRJ70	70	US	LAX	Winter	Dec	18,800	80	56	12,320	6,480
					Jan	18,800	80	56	12,320	6,480
					Feb	18,800	80	56	12,320	6,480
				Spring	Mar	18,800	80	56	12,320	6,480
					Apr	18,800	80	56	12,320	6,480
					May	18,800	80	56	12,320	6,480
				Summer	Jun	18,800	80	56	12,320	6,480
					Jul	18,800	80	56	12,320	6,480
					Aug	18,800	80	56	12,320	6,480
				Fall	Sep	18,800	80	56	12,320	6,480
					Oct	18,800	80	56	12,320	6,480
					Nov	18,800	80	56	12,320	6,480
Annual Average					18,800	80	56	12,320	6,480	

Source: American Airlines

Series 600 Letters of Support

Congress of the United States
Washington, D.C. 20515

January 5, 2015

The Honorable Anthony Foxx
Secretary of Transportation
U.S. Department of Transportation
1200 New Jersey Avenue, S.E.
Washington, DC 20590

RE: American Airlines' Los Angeles-Haneda Application,
Docket DOT-OST-2010-0018

Dear Secretary Foxx:

We write to convey our strong support for American Airlines' application to acquire a slot pair from the Department of Transportation to provide service from Los Angeles International Airport (LAX) to Tokyo's Haneda Airport (Haneda).

As you know, the Governments of the United States and Japan signed an aviation agreement in 2010 that provided four daily nonstop flights from the United States to Haneda, Tokyo's downtown airport. These nonstop flights to Haneda are scarce assets that should be distributed among U.S. carriers to obtain the maximum consumer and economic benefits. All four daily flights are currently operated by three U.S. carriers.

American Airlines, the largest U.S. international carrier, does not operate any flights to Haneda, leaving its customers without direct access to downtown Tokyo. Allowing American Airlines to compete in the LAX-Haneda market will increase competition and maximize options for U.S. consumers travelling to, and doing business with, Japan. Moreover, we have been assured by American that it intends to operate the service year-round, without seasonal cancellations.

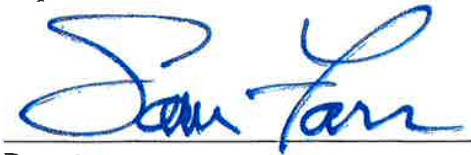
California and Japan's strong business and cultural ties further underscore the need for American Airlines' service to Haneda from LAX. In 2011, Japan was the largest source of foreign direct investment into Los Angeles County, and travel demand between the United States and Japan was supported by the approximately 250,000 Japanese Americans and 50,000 Japanese nationals living in Southern California. American Airlines' LAX-Haneda service will not only better connect travelers and businesses, but it will help stimulate new business opportunities and create jobs for California companies.

We strongly believe American Airlines' application for nonstop service between LAX and Haneda will not only have a positive impact on both our constituents and our state's economy, but will best utilize the scarce Haneda slots. We encourage you to approve American Airlines' application without delay.

Sincerely,



Rep. Maxine Waters



Rep. Sam Farr



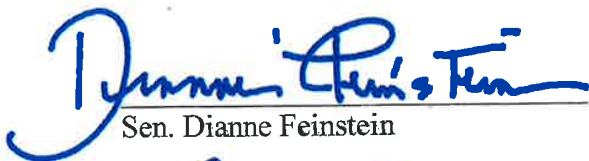
Rep. Tony Cárdenas



Rep. Karen Bass



Rep. Jim Costa



Sen. Dianne Feinstein



Rep. Loretta Sanchez



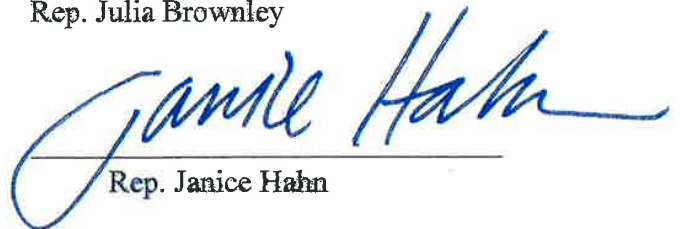
Rep. Ken Calvert



Rep. Duncan Hunter



Rep. Julia Brownley



Rep. Janice Hahn



Rep. Linda T. Sánchez



Rep. Adam B. Schiff



Rep. Alan Lowenthal



Rep. Juan Vargas



Rep. Mark Takano

cc: Susan Kurland, Assistant Secretary for Aviation and International Affairs



December 30, 2014

The Honorable Anthony R. Foxx
Secretary of Transportation
U.S. Department of Transportation
1200 New Jersey Avenue, SE
Washington, DC 20590

**Re: Application of American Airlines in the U.S.-Haneda Combination
Services Allocation Proceeding, Docket DOT-OST-2010-0018**

Dear Secretary Foxx:

On behalf of the U.S.-Japan Council, I am writing to convey our strong and enthusiastic support for American Airlines' application to acquire a slot pair from the Department to serve Tokyo's Haneda Airport ("Haneda") from Los Angeles International Airport ("LAX"). This is a very significant opportunity to enhance the travel, economic relationships, and continued ties between Japan and the United States especially the Western part of the country.

The U.S.-Japan Council is headquartered in Washington, D.C. with offices in Los Angeles and Tokyo. The Council's mission is to create active people-to-people relationships to ensure a strong relationship between the United States and Japan. As a leadership organization the Council has Council members throughout the U.S. and Japan with the largest number in the Western United States. Since the 2011 disasters in the Tohoku region, the Council has administered the TOMODACHI initiative, a public-private partnership with the U.S. Embassy in Tokyo. We have raised nearly \$40 million from Japanese and American companies that has supported over 3,000 young people in cross-cultural leadership and exchange programs between the U.S. and Japan and served over 10,000 young people in programs within each country. With the interest on the part of both governments to increase student exchanges, as re-committed by President Obama and Prime Minister Abe in their spring 2014 meeting, the ability to increase flights between Los Angeles and Haneda is critically important.

In addition to the Council's work on TOMODACHI, the Council sponsors conferences, symposia, and special events that encourage closer business, government, and community ties at all levels. We have worked with members of the Japanese Parliament and the U.S. Congress as well as state legislatures to support greater legislative exchanges. In November 2015, the Council will hold its Annual Conference in Tokyo Japan, for the first

time-ever. We are expecting a large attendance of American leaders, including many Japanese American leaders, who want to ensure that the new opportunities for collaboration with Japan can be explored and realized. The largest concentration of our members are in the Southern California area and we know many travel back and forth to Japan and will plan to attend next year's Conference.

American Airlines has been a strong partner with the U.S.-Japan Council from our inception and we would strongly encourage support for their application. The nonstop flights to Haneda Airport are scarce national resources that should be distributed amongst U.S. carriers to obtain the maximum consumer and economic benefits. Yet, today three U.S. carriers operate the four daily flights at Haneda, limiting travel options for U.S. consumers and shippers who want convenient access to Tokyo. We are convinced that American's proposed daily service from LAX to Haneda will have the effect of increasing the existing cultural, educational and leisure tourism, and business ties.

As you may be aware, California and Japan enjoy strong business and cultural ties that further underscore the necessity for American Airlines' service to Haneda. In 2011, Japan was the largest source of Foreign Direct Investment into Los Angeles County while travel demand between the two countries was sustained by the approximately 250,000 Japanese Americans and 50,000 Japanese nationals living in Southern California. American Airlines' LAX-Haneda flight will not only better connect travelers and businesses, but it will help stimulate new business opportunities and create much needed jobs for other California companies.

We strongly believe American Airlines' application for nonstop service between LAX and Haneda will not only have a positive impact on both our constituents and our state's economy, but will best utilize the scarce Haneda slots. Therefore, we urge you to approve American Airlines' proposal to serve Haneda from LAX without further delay.

Sincerely,



Irene Hirano Inouye
President

Cc: Susan Kurland, Assistant Secretary for Aviation and International Affairs

Henry Y. Ota

Attorney-at-Law

12492 Hillside Drive
Moorpark, CA 93021
(714) 330-5446
h.otalaw@gmail.com

The Honorable Anthony R. Foxx
Secretary of Transportation
U.S. Department of Transportation
1200 New Jersey Avenue, SE
Washington, DC 20590

**Re: Application of American Airlines in the U.S.-Haneda Combination Services
Allocation Proceeding, Docket DOT-OST-2010-0018**

Dear Secretary Foxx:

I am writing this letter to you wearing several hats. I am a leader in the Japanese American community here in Los Angeles and I serve as the Vice-Chair of the US-Japan Council (350 members) whose Board of Councilors has Secretary Mineta as a Vice Chair. The USJC's mission is to engage Japanese Americans in U.S.-Japan relations and this council organizes several trips to Japan each year. I am also the Chair of the Japanese American Cultural Center (1000 members) based in Los Angeles which is the largest such center in the U.S. that brings Japanese culture and arts to our audiences in Los Angeles. I have served as the legal advisor to the Japan Business Association of Southern California which has over 450 Japanese business members who frequently make the trip to Japan from Los Angeles. Finally, from a personal standpoint, I am a frequent traveler to Japan, making about 4 trips each year, because my legal practice continues to serve Japanese companies and AA has always been my airline of choice.

It is in this context that I write to express my overwhelming support for American Airlines' application to acquire a slot pair from the Department to serve Tokyo's Haneda Airport ("Haneda") from Los Angeles International Airport ("LAX"). It is clear to me that the Los Angeles community and in particular the Japanese American community and the large Japanese business community would not just welcome this addition but would be well served by this added flight into Haneda.


I understand that the nonstop flights to Haneda are scarce national resources that should be distributed amongst U.S. carriers to obtain the maximum consumer and economic benefits. Yet, today only three U.S. carriers operate the four daily flights at Haneda, limiting

travel options for U.S. consumers and shippers who want convenient access to Tokyo. It is clear to me that our community would both benefit greatly from American's proposed daily service from LAX to Haneda which will have the effect of strengthening the cultural, tourism, and business ties between the greater Los Angeles region and Japan.

As I am sure that you are aware, California and Japan enjoy strong business and cultural ties that further underscore the necessity for American Airlines' service to Haneda. Just a month ago, Los Angeles Mayor Eric Garcetti visited Japan to promote increased business ties with our Los Angeles business community. It is a fact that In 2011, Japan was the largest source of Foreign Direct Investment into Los Angeles County while travel demand between the two countries was sustained by the approximately 250,000 Japanese Americans and 50,000 Japanese nationals living in Southern California. American Airlines' LAX-Haneda flight will not only better connect travelers and businesses, but it will help stimulate new business opportunities and create much needed jobs for California companies.

We strongly believe you should support the American Airlines' application for nonstop service between LAX and Haneda because it will not only have a positive impact on both our Japanese American community, the Japanese business community and our state's economy, but will best utilize the scarce Haneda slots. Therefore, we urge you to approve American Airlines' proposal to serve Haneda from LAX without further delay.

Sincerely,



Henry Y. Ota

Vice-Chair, U.S.-Japan Council
Chair, Japanese American Cultural Center

Cc: Susan Kurland, Assistant Secretary for Aviation and International Affairs



January 2, 2015

The Honorable Anthony R. Foxx
Secretary of Transportation
U.S. Department of Transportation
1200 New Jersey Avenue, SE
Washington, DC 20590

**Re: Application of American Airlines in the U.S.-Haneda Combination Services
Allocation Proceeding, Docket DOT-OST-2010-0018**

Dear Secretary Foxx:

I represent TTA, Inc. (TOPTOUR CORPORATION, Japan) that provide inbound and outbound travel service between US and Japan located in Los Angeles, New York, San Francisco, Honolulu and Japan (92 offices). We employ 50 workers in US and 2,000 workers in Japan to provide our product/service and the service proposed by American Airlines will contribute to continued growth of our business/customer base. It is in this context that we write to express our enthusiastic support for American Airlines' application to acquire a slot pair from the Department to serve Tokyo's Haneda Airport ("Haneda") from Los Angeles International Airport ("LAX").

The nonstop flights to Haneda are scarce national resources that should be distributed amongst U.S. carriers to obtain the maximum consumer and economic benefits. Yet, today three U.S. carriers operate the four daily flights at Haneda, limiting travel options for U.S. consumers and shippers who want convenient access to Tokyo. We are convinced that American's proposed daily service from LAX to Haneda will have the effect of increasing the existing cultural, tourism, and business ties.

As you may be aware, California and Japan enjoy strong business and cultural ties that further underscore the necessity for American Airlines' service to Haneda. In 2011, Japan was the largest source of Foreign Direct Investment into Los Angeles County while travel demand between the two countries was sustained by the approximately 250,000 Japanese Americans and 50,000 Japanese nationals living in Southern California. American Airlines' LAX-Haneda flight will not only better connect travelers and businesses, but it will help stimulate new business opportunities and create much needed jobs for other California companies.



We strongly believe American Airlines' application for nonstop service between LAX and Haneda will not only have a positive impact on both our constituents and our state's economy, but will best utilize the scarce Haneda slots. Therefore, we urge you to approve American Airlines' proposal to serve Haneda from LAX without further delay.

Sincerely,

A handwritten signature in black ink, appearing to read "Mike M. Miura".

Mike M. Miura
President, C.E.O.
TTA, Inc.

Cc: Susan Kurland, Assistant Secretary for Aviation and International Affairs



December 30, 2014

The Honorable Anthony R. Foxx
Secretary of Transportation
United States Department of Transportation
1200 New Jersey Avenue, SE
Washington, DC 20590

Subject: Application of American Airlines in the U.S.-Haneda Combination Services Allocation Proceeding, Docket DOT-OST-2010-0018

Dear Secretary Foxx:

I am the founder, chairman and chief collaboration officer of IW Group, a minority-owned and operated company with offices in Los Angeles, New York and San Francisco. Our firm specializes in marketing and advertising to Asian-American consumers, the fastest growing segment of the United States population. We employ more than 60 full-time professionals and will celebrate our 25th anniversary next year.

Our company's growth and development is heavily dependent on having accessible, affordable and regular service to global and domestic markets, including Japan. Since we rely so heavily on having service to and from Los Angeles International Airport (LAX), we were thrilled to learn that American Airlines has applied to secure a slot-pair from the U.S. Department of Transportation to serve Tokyo International Airport/Haneda Airport (HND) from LAX.

It is very, very difficult for a small, but growing company to secure nonstop service to HND. I feel very strongly that businesses and consumers should have better access to this airport since it is often more convenient to fly there than the larger Narita International Airport. It is my understanding that only three airline companies currently operate daily service at HND, which does not provide enough options for growing companies such as ours. Having additional service and access to HND will increase options and positively impact international trade, tourism, educational and cultural ties and much more.

As you and your colleagues may already know, Los Angeles and Southern California are home to the largest number of Japanese and Japanese-American companies in the country. Direct foreign investment in Los Angeles County by the Japanese has created thousands of jobs and has fueled our economy for a number of years. In order for the greater Los Angeles area to

Hon. Anthony R. Foxx

Page 2

remain competitive in an increasingly competitive global world, we must have regular and convenient access to airports such as HND

Two years ago, I co-founded a national Asian/Pacific-Islander American Chamber of Commerce to address the needs, interests and aspirations of entrepreneurs, business owners and corporate leaders of Asian Americans, Native Hawaiians and Pacific Islanders. Our organization strongly believes that future economic development between the U.S. and Asia requires transportation access to all major Asian markets, including Tokyo. In 2015-16, we are planning at least one trade mission to Japan. Having additional access to HND will help us in promoting this trade mission to our members and governmental partners.

Since airline slots at HND rarely become available, we strongly urge swift and decisive action by you and the U.S. Department of Transportation to approve American Airlines' proposal to serve Haneda Airport from Los Angeles International Airport.

I would appreciate a response to this letter. I also request being kept informed on the progress of American Airlines' proposal.

Very truly yours,



Bill Imada
Chairman and Chief Collaboration Officer
IW Group, Inc.

cc: Hon. Susan Kurland, Assistant Secretary for Aviation and International Affairs
Hon. Jay Rockefeller, Chairman, Commerce, Science and Transportation Committee, U.S. Senate
Ms. Sach Takayasu, President and CEO, Asian/Pacific Islander American Chamber of Commerce and Entrepreneurship (ACE)
Mr. Jimmy Ferguson, Chairman, ACE

December 30, 2014

The Honorable Anthony R. Foxx
Secretary of Transportation
U.S. Department of Transportation
1200 New Jersey Avenue, SE
Washington, DC 20590

**Re: Application of American Airlines in the U.S.-Haneda Combination Services
Allocation Proceeding, Docket DOT-OST-2010-0018**

Dear Secretary Foxx:

I represent C&H International that provide airline ticket sales located in Los Angeles. We employ 275 workers to provide our service and the service proposed by American Airlines will contribute to continued growth of our business and customer base. It is in this context that we write to express our enthusiastic support for American Airlines' application to acquire a slot pair from the Department to serve Tokyo's Haneda Airport ("Haneda") from Los Angeles International Airport ("LAX").

The nonstop flights to Haneda are scarce national resources that should be distributed amongst U.S. carriers to obtain the maximum consumer and economic benefits. Yet, today three U.S. carriers operate the four daily flights at Haneda, limiting travel options for U.S. consumers and shippers who want convenient access to Tokyo. We are convinced that American's proposed daily service from LAX to Haneda will have the effect of increasing the existing cultural, tourism, and business ties.

As you may be aware, California and Japan enjoy strong business and cultural ties that further underscore the necessity for American Airlines' service to Haneda. In 2011, Japan was the largest source of Foreign Direct Investment into Los Angeles County while travel demand between the two countries was sustained by the approximately 250,000 Japanese Americans and 50,000 Japanese nationals living in Southern California. American Airlines' LAX-Haneda flight will not only better connect travelers and businesses, but it will help stimulate new business opportunities and create much needed jobs for other California companies.

We strongly believe American Airlines' application for nonstop service between LAX and Haneda will not only have a positive impact on both our constituents and our state's economy, but will best utilize the scarce Haneda slots. Therefore, we urge you to approve American Airlines' proposal to serve Haneda from LAX without further delay.

Sincerely,


Alice Kikuchi

Vice President, C&H International
4751 Wilshire Blvd., Suite 201,
Los Angeles, CA 90010

Cc: Susan Kurland, Assistant Secretary for Aviation and International Affairs

December 30, 2014

The Honorable Anthony R. Foxx
Secretary of Transportation
U.S. Department of Transportation
1200 New Jersey Avenue, SE
Washington, DC 20590

Re: Application of American Airlines in the U.S.-Haneda Combination Services Allocation Proceeding, Docket DOT-OST-2010-0018

Dear Secretary Foxx:

I represent Kintetsu International Express Travel Consultants Company that provides travel related services located in NEW YORK, NEW JERSEY, CHICAGO, LOS ANGELES and SAN JOSE. We employ 69 workers to provide our product/service and the service proposed by American Airlines will contribute to continued growth of our business/customer base. It is in this context that we write to express our enthusiastic support for American Airlines' application to acquire a slot pair from the Department to serve Tokyo's Haneda Airport ("Haneda") from Los Angeles International Airport ("LAX").

The nonstop flights to Haneda are scarce national resources that should be distributed amongst U.S. carriers to obtain the maximum consumer and economic benefits. Yet, today three U.S. carriers operate the four daily flights at Haneda, limiting travel options for U.S. consumers and shippers who want convenient access to Tokyo. We are convinced that American's proposed daily service from LAX to Haneda will have the effect of increasing the existing cultural, tourism, and business ties.

As you may be aware, California and Japan enjoy strong business and cultural ties that further underscore the necessity for American Airlines' service to Haneda. In 2011, Japan was the largest source of Foreign Direct Investment into Los Angeles County while travel demand between the two countries was sustained by the approximately 250,000 Japanese Americans and 50,000 Japanese nationals living in Southern California. American Airlines' LAX-Haneda flight will not only better connect travelers and businesses, but it will help stimulate new business opportunities and create much needed jobs for other California companies.

We strongly believe American Airlines' application for nonstop service between LAX and Haneda will not only have a positive impact on both our clients and our state's economy, but will best utilize the scarce Haneda slots. Therefore, we urge you to approve American Airlines' proposal to serve Haneda from LAX without further delay.

Sincerely,

Koji Hamada, President
Kintetsu International Express
Travel Consultants Company

Cc: Susan Kurland, Assistant Secretary for Aviation and International Affairs



THE PACIFIC BRIDGE COMPANIES

December 29, 2014

The Honorable Anthony R. Foxx
Secretary of Transportation
U.S. Department of Transportation
1200 New Jersey Avenue, SE
Washington, DC 20590

Re: Application of American Airlines in the U.S.-Haneda Combination Services Allocation Proceeding, Docket DOT-OST-2010-0018

Dear Secretary Foxx:

We write to encourage you to approve American Airlines' proposal to serve Haneda from LAX without further delay.

I am the CEO of The Pacific Bridge Companies, an international wealth management firm helping to connect financial advisors from banking, insurance, investment, tax, and the law, and from different geographical locations between Asia and the United States. We employ and independently contract over 400 practitioners between Japan and the United States alone to deliver to our vision -- to help financial advisors help their clients wherever in the world their lives may lead. We believe that the American Airlines proposal will contribute to continued growth of our business relationships and overall customer base. It is because of this that I write to express our holding company's enthusiastic support for American Airlines' application to acquire a slot pair from the Department to serve Tokyo's Haneda Airport ("Haneda") from Los Angeles International Airport ("LAX").

We understand the nonstop flights to Haneda to be scarce national resources. Today only three U.S. carriers operate daily flights at Haneda, limiting travel options for U.S. consumers and shippers who want convenient access to Tokyo while failing to maximize the potential economic benefit to those involved within the region. We further believe that American's proposed daily service from LAX to Haneda may help increase existing cultural exchange, tourism, and business ties, underscoring the necessity for American Airlines' service to Haneda. In 2011, Japan was the largest source of Foreign Direct Investment into Los Angeles County while much of that travel demand between the two countries was sustained by the approximately 250,000 Japanese Americans and 50,000 Japanese nationals living in Southern California. American Airlines' LAX-Haneda flight will not only better connect travelers and businesses, but promises to help stimulate new business opportunities and create much needed jobs for other California companies.

With all of this at hand, we urge you to expeditiously approve American Airlines' application for nonstop service between LAX and Haneda.

With sincere hope,

Stephen Kagawa

cc: Susan Kurland, Assistant Secretary for Aviation and International Affairs

Stephen Kagawa, FSS, LUTCF

President & CEO

skagawa@thepacificbridgecompanies.com

www.thepacificbridgecompanies.com



DATE: January 2nd, 2015

The Honorable Anthony R. Foxx
Secretary of Transportation
U.S. Department of Transportation
1200 New Jersey Avenue, SE
Washington, DC 20590

Re: Application of American Airlines in the U.S.-Haneda Combination Services Allocation Proceeding, Docket DOT-OST-2010-0018

Dear Secretary Foxx:

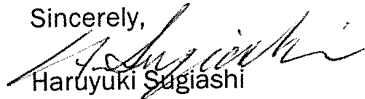
I represent NTA America Inc. that provides travel service located in Los Angeles, New Jersey, San Francisco and Japan. We employ 40 workers in the USA to provide our product/service and the service proposed by American Airlines will contribute to continued growth of our business/customer base. It is in this context that we write to express our enthusiastic support for American Airlines' application to acquire a slot pair from the Department to serve Tokyo's Haneda Airport ("Haneda") from Los Angeles International Airport ("LAX").

The nonstop flights to Haneda are scarce national resources that should be distributed amongst U.S. carriers to obtain the maximum consumer and economic benefits. Yet, today three U.S. carriers operate the four daily flights at Haneda, limiting travel options for U.S. consumers and shippers who want convenient access to Tokyo. We are convinced that American's proposed daily service from LAX to Haneda will have the effect of increasing the existing cultural, tourism, and business ties.

As you may be aware, California and Japan enjoy strong business and cultural ties that further underscore the necessity for American Airlines' service to Haneda. In 2011, Japan was the largest source of Foreign Direct Investment into Los Angeles County while travel demand between the two countries was sustained by the approximately 250,000 Japanese Americans and 50,000 Japanese nationals living in Southern California. American Airlines' LAX-Haneda flight will not only better connect travelers and businesses, but it will help stimulate new business opportunities and create much needed jobs for other California companies.

We strongly believe American Airlines' application for nonstop service between LAX and Haneda will not only have a positive impact on both our constituents and our state's economy, but will best utilize the scarce Haneda slots. Therefore, we urge you to approve American Airlines' proposal to serve Haneda from LAX without further delay.

Sincerely,



Haruyuki Sugiashi
President
NTA America Inc.
1025 W. 190th Street, Suite 301
Gardena, CA 90248

Cc: Susan Kurland, Assistant Secretary for Aviation and International Affairs



Pacific
Commerce
Bank

December 30, 2014

The Honorable Anthony R. Foxx
Secretary of Transportation
U.S. Department of Transportation
1200 New Jersey Avenue, SE
Washington, DC 20590

**Re: Application of American Airlines in the U.S.-Haneda Combination Services Allocation Proceeding,
Docket DOT-OST-2010-0018**

Dear Secretary Foxx:

I represent Pacific Commerce Bank, a Community Bank in the Little Tokyo area of Los Angeles, California. We have 36 employees to provide the Bank's financial services, and the service proposed by American Airlines will contribute to continued growth of our business and customer base. It is in this context that we write to express our enthusiastic support for American Airlines' application to acquire a slot pair from the Department to serve Tokyo's Haneda Airport ("Haneda") from Los Angeles International Airport ("LAX").

The nonstop flights to Haneda are scarce national resources that should be distributed amongst U.S. carriers to obtain the maximum consumer and economic benefits. Yet, today three U.S. carriers operate the four daily flights at Haneda, limiting travel options for U.S. consumers and shippers who want convenient access to Tokyo. We are convinced that American's proposed daily service from LAX to Haneda will have the effect of increasing the existing cultural, tourism, and business ties.

As you may be aware, California and Japan enjoy strong business and cultural ties which further underscore the necessity for American Airlines' service to Haneda. In 2011, Japan was the largest source of Foreign Direct Investment into Los Angeles County while travel demand between the two countries was sustained by the approximately 250,000 Japanese Americans and 50,000 Japanese nationals living in Southern California. American Airlines' LAX-Haneda flight will not only better connect travelers and businesses, but it will help stimulate new business opportunities and create much needed jobs for other California companies.

We strongly believe American Airlines' application for nonstop service between LAX and Haneda will not only have a positive impact on both our constituents and our State's economy, but will best utilize the scarce Haneda slots. Therefore, we urge you to approve American Airlines' proposal to serve Haneda from LAX without further delay.

Sincerely,

Thomas Iino
Chairman of the Board

cc: Susan Kurland, Assistant Secretary for Aviation and International Affairs

Bob Graziano
Chairman

Kathryn Schloessman
President

December 20, 2014

The Honorable Anthony R. Foxx
Secretary of Transportation
U.S. Department of Transportation
1200 New Jersey Avenue, SE
Washington, DC 20590

Re: Application for American Airlines in the U.S.-Haneda Combination Services Allocation Proceeding, Docket DOT-OST-2010-0018

Dear Secretary Foxx:

I represent Los Angeles Sports & Entertainment Commission (LASEC) that partners with the City of Los Angeles the Los Angeles Tourism and Convention Board, to help bring major sporting and entertainment events to Los Angeles, like the NBA All-Star Weekend, the GRAMMY Awards, the College Football Playoffs and many more. These events have a significant economic impact on the local economy and continue to spotlight Los Angeles as the Entertainment Capital of the World.

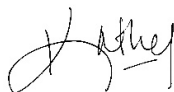
The service proposed by American Airlines will contribute to continued growth of our business/customer base, as well as our many global sponsors and board members. It is in this context that we write to express our enthusiastic support for American Airlines' application to acquire a slot pair from the Department to serve Tokyo's Haneda Airport ("Haneda") from Los Angeles International Airport ("LAX").

The nonstop flights to Haneda are scarce national resources that should be distributed amongst U.S. carriers to obtain the maximum consumer and economic benefits. Yet, today three U.S. carriers operate the four daily flights at Haneda, limiting travel options for U.S. consumers and shippers who want convenient access to Tokyo. We are convinced that American's proposed daily service from LAX to Haneda will have the effect of increasing the existing cultural, tourism, and business ties.

As you may be aware, California and Japan enjoy strong business and cultural ties that further underscore the necessity for American Airlines' service to Haneda. In 2011, Japan was the largest source of Foreign Direct Investment into Los Angeles County while travel demand between the two countries was sustained by the approximately 250,000 Japanese Americans and 50,000 Japanese nationals living in Southern California. American Airlines' LAX-Haneda flight will not only better connect travelers and businesses, but it will help stimulate new business opportunities and create much needed jobs for other California companies.

We strongly believe American Airlines' application for nonstop service between LAX and Haneda will not only have a positive impact on both our constituents and our state's economy, but will best utilize the scarce Haneda slots. Therefore, we urge you to approve American Airlines' proposal to serve Haneda from LAX without further delay.

Sincerely,

A handwritten signature in black ink, appearing to read "Kathy", with a stylized flourish at the end.

Kathryn S. Schloessman
President

cc: Susan Kurland, Assistant Secretary for Aviation and International Affairs



ABLE Freight Services, Inc. • 5340 West 104th Street • Los Angeles, CA 90045

(310) 568-8883 office • (310) 568-8658 fax • www.AbleFreight.com

5th January, 2015

The Honorable Anthony R. Foxx
Secretary of Transportation
U.S. Department of Transportation
1200 New Jersey Avenue, SE
Washington, DC 20590

Re: Application for American Airlines in the U.S.-Haneda Combination Services Allocation Proceeding, Docket DOT-OST-2010-0018

Dear Secretary Foxx:

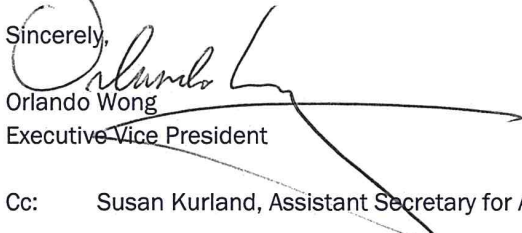
I represent Able Freight Services that provides transportation services for fresh produce located in California. We employ 280 workers to provide our product/service and the service proposed by American Airlines will contribute to continued growth of our business/customer base. It is in this context that we write to express our enthusiastic support for American Airlines' application to acquire a slot pair from the Department to serve Tokyo's Haneda Airport ("Haneda") from Los Angeles International Airport ("LAX").

The nonstop flights to Haneda are scarce national resources that should be distributed amongst U.S. carriers to obtain the maximum consumer and economic benefits. Yet, today three U.S. carriers operate the four daily flights at Haneda, limiting travel options for U.S. consumers and shippers who want convenient access to Tokyo. We are convinced that American's proposed daily service from LAX to Haneda will have the effect of increasing the existing cultural, tourism, and business ties.

As you may be aware, California and Japan enjoy strong business and cultural ties that further underscore the necessity for American Airlines' service to Haneda. In 2011, Japan was the largest source of Foreign Direct Investment into Los Angeles County while travel demand between the two countries was sustained by the approximately 250,000 Japanese Americans and 50,000 Japanese nationals living in Southern California. American Airlines' LAX-Haneda flight will not only better connect travelers and businesses, but it will help stimulate new business opportunities and create much needed jobs for other California companies.

We strongly believe American Airlines' application for nonstop service between LAX and Haneda will not only have a positive impact on both our customers and our state's economy, but will best utilize the scarce Haneda slots. Therefore, we urge you to approve American Airlines' proposal to serve Haneda from LAX without further delay.

Sincerely,


Orlando Wong
Executive Vice President

Cc: Susan Kurland, Assistant Secretary for Aviation and International Affairs





Lim, Ruger & Kim, LLP
1055 West Seventh Street, Suite 2800
Los Angeles, California 90017-2554
Tel: (213) 955-9500
Fax: (213) 955-9511
www.limruger.com

Sandy Sakamoto
Email: sandy.sakamoto@limruger.com

December 30, 2014

The Honorable Anthony R. Foxx
Secretary of Transportation
U.S. Department of Transportation
1200 New Jersey Avenue, SE
Washington, DC 20590

**Re: Application of American Airlines in the U.S.-Haneda Combination
Services Allocation Proceeding, Docket DOT-OST-2010-0018**

Dear Secretary Foxx:

As an attorney with a firm that does business with Asia and an active member of the Japanese American community in Los Angeles I write to support American Airlines' application to acquire a slot pair from the Department to serve Tokyo's Haneda Airport ("Haneda") from Los Angeles International Airport ("LAX").

The nonstop flights to Haneda are scarce national resources that should be distributed amongst U.S. carriers to obtain the maximum consumer and economic benefits. Yet, today three U.S. carriers operate the four daily flights at Haneda, limiting travel options for U.S. consumers and shippers who want convenient access to Tokyo. We are convinced that American's proposed daily service from LAX to Haneda will have the effect of increasing the existing cultural, tourism, and business ties.

As you may be aware, California and Japan enjoy strong business and cultural ties that further underscore the necessity for American Airlines' service to Haneda. In 2011, Japan was the largest source of Foreign Direct Investment into Los Angeles County while travel demand between the two countries was sustained by the approximately 250,000 Japanese Americans and 50,000 Japanese nationals living in Southern California. American Airlines' LAX-Haneda flight will not only better connect travelers and businesses, but it will help stimulate new business opportunities and create much needed jobs for other California companies.

We strongly believe American Airlines' application for nonstop service between LAX and Haneda will not only have a positive impact on both our constituents and our

The Honorable Anthony R. Foxx
Secretary of Transportation
U.S. Department of Transportation
December 30, 2014
Page 2 of 2

state's economy, but will best utilize the scarce Haneda slots. Therefore, we urge you to approve American Airlines' proposal to serve Haneda from LAX without further delay.

Sincerely,

LIM, RUGER & KIM, LLP

A handwritten signature in black ink, appearing to read "Sandy L. Sakamoto", with a long horizontal flourish extending to the right.

Sandy L. Sakamoto

cc: Susan Kurland, Assistant Secretary for Aviation and International Affairs

DATE: 12/23/14

The Honorable Anthony R. Foxx
Secretary of Transportation
U.S. Department of Transportation
1200 New Jersey Avenue, SE
Washington, DC 20590

**Re: Application fo American Airlines in the U.S.-Haneda Combination Services
Allocation Proceeding, Docket DOT-OST-2010-0018**

Dear Secretary Foxx:

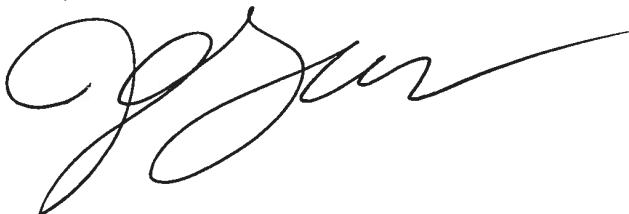
I represent Fellowship Travel International that provide Travel Services located in Richmond, VA. We employ 34 workers to provide our product/service and the service proposed by American Airlines will contribute to continued growth of our business/customer base. It is in this context that we write to express our enthusiastic support for American Airlines' application to acquire a slot pair from the Department to serve Tokyo's Haneda Airport ("Haneda") from Los Angeles International Airport ("LAX").

The nonstop flights to Haneda are scarce national resources that should be distributed amongst U.S. carriers to obtain the maximum consumer and economic benefits. Yet, today three U.S. carriers operate the four daily flights at Haneda, limiting travel options for U.S. consumers and shippers who want convenient access to Tokyo. We are convinced that American's proposed daily service from LAX to Haneda will have the effect of increasing the existing cultural, tourism, and business ties.

As you may be aware, California and Japan enjoy strong business and cultural ties that further underscore the necessity for American Airlines' service to Haneda. In 2011, Japan was the largest source of Foreign Direct Investment into Los Angeles County while travel demand between the two countries was sustained by the approximately 250,000 Japanese Americans and 50,000 Japanese nationals living in Southern California. American Airlines' LAX-Haneda flight will not only better connect travelers and businesses, but it will help stimulate new business opportunities and create much needed jobs for other California companies.

We strongly believe American Airlines' application for nonstop service between LAX and Haneda will not only have a positive impact on both our constituents and our state's economy, but will best utilize the scarce Haneda slots. Therefore, we urge you to approve American Airlines' proposal to serve Haneda from LAX without further delay.

Sincerely,

A handwritten signature in black ink, appearing to be "J. Sun", written in a cursive style.

Jeremy Lawhorn
Vice President
Fellowship Travel International
804-550-0121 x102
jlawhorn@fellowship.com

Cc: Susan Kurland, Assistant Secretary for Aviation and International Affairs



December 22, 2014

The Honorable Anthony R. Foxx
Secretary of Transportation
U.S. Department of Transportation
1200 New Jersey Avenue, SE
Washington, DC 20590

Re: Application of American Airlines in the U.S.-Haneda Combination Services Allocation Proceeding, Docket DOT-OST-2010-0018

Dear Secretary Foxx:

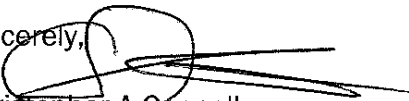
I represent Commodity Forwarders that provide Air Cargo Freight Forwarding Services located throughout the USA. We employ over 400 workers to provide our product/service and the service proposed by American Airlines will contribute to continued growth of our business/customer base. It is in this context that we write to express our enthusiastic support for American Airlines' application to acquire a slot pair from the Department to serve Tokyo's Haneda Airport ("Haneda") from Los Angeles International Airport ("LAX").

The nonstop flights to Haneda are scarce national resources that should be distributed amongst U.S. carriers to obtain the maximum consumer and economic benefits. Yet, today three U.S. carriers operate the four daily flights at Haneda, limiting travel options for U.S. consumers and shippers who want convenient access to Tokyo. We are convinced that American's proposed daily service from LAX to Haneda will have the effect of increasing the existing cultural, tourism, and business ties.

As you may be aware, California and Japan enjoy strong business and cultural ties that further underscore the necessity for American Airlines' service to Haneda. In 2011, Japan was the largest source of Foreign Direct Investment into Los Angeles County while travel demand between the two countries was sustained by the approximately 250,000 Japanese Americans and 50,000 Japanese nationals living in Southern California. American Airlines' LAX-Haneda flight will not only better connect travelers and businesses, but it will help stimulate new business opportunities and create much needed jobs for other California companies.

We strongly believe American Airlines' application for nonstop service between LAX and Haneda will not only have a positive impact on both our constituents and our state's economy, but will best utilize the scarce Haneda slots. Therefore, we urge you to approve American Airlines' proposal to serve Haneda from LAX without further delay.

Sincerely,


Christopher A. Connell
President, Commodity Forwarders Inc.
Chris@cfi-lax.com

Cc: Susan Kurland, Assistant Secretary for Aviation and International Affairs

December 30, 2014

The Honorable Anthony R. Foxx
Secretary of Transportation
U.S. Department of Transportation
1200 New Jersey Avenue, SE
Washington, DC 20590

Re: Application of American Airlines in the U.S.-Haneda Combination Services Allocation Proceeding, Docket DOT-OST-2010-0018

Dear Secretary Foxx:

I represent Union Bank in Los Angeles and we are a global financial services company located across the US and across the Pacific in Japan. We employ over 12,000 employees here in the US who provides financial services and the new transpacific service proposed by American Airlines will contribute to continued growth of our business/customer base. It is in this context that I write to express our enthusiastic support for American Airlines' application to acquire a slot pair from the Department to serve Tokyo's Haneda Airport ("Haneda") from Los Angeles International Airport ("LAX").

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Sincerely,



J. George Tanaka
Managing Director
Retail Specialized Markets

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Cc: Susan Kurland, Assistant Secretary for Aviation and International Affairs