

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

Motions and Application of

**AMERICAN AIRLINES, INC.
HAWAIIAN AIRLINES, INC.**

**In the matter of 2010 U.S.-Haneda Combination
Services Allocation Proceeding**

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Docket DOT-OST-2010-0018

**CONSOLIDATED ANSWER
OF DELTA AIR LINES, INC.**

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January 12, 2015

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**CONSOLIDATED ANSWER
OF DELTA AIR LINES, INC.**

Delta Air Lines Inc. (“Delta”) hereby responds to the Applications of American Airlines Inc. (“American”) and Hawaiian Airlines, Inc. (“Hawaiian”). In 2013 Delta established the first and only nonstop Haneda gateway from the Pacific Northwest region at Seattle. As the service has taken root – fueled in large part by Delta’s strong commitment to growing the Seattle hub – we have seen significant market improvements in traffic and profitability.

American’s and Hawaiian’s efforts to strip Seattle and Washington State of their only Haneda flight and move the slots to abundantly served states in California and Hawaii is contrary to the public interest and the Department’s prior findings in selecting Seattle. Delta is currently operating Seattle-Haneda service in full compliance with the terms and conditions specified in Order 2013-2-4 (“Allocation Order”), including the dormancy condition. Although Delta is operating at a temporarily reduced level, Delta has firm plans, has allocated aircraft, is actively marketing, and will operate daily service at the start of the IATA Summer Season, effective March 29, 2015 and beyond.¹

¹ Delta reiterates that it does not concede the lawfulness of the Department’s decision to reexamine the allocation of the Seattle-Haneda frequencies or of any final decision to reallocate the same slots to another carrier. Delta expressly incorporates by reference its Petition for

1. The Public Benefits of Seattle-Haneda service are superior to American's and Hawaiian's Proposals.

If service were taken away from Seattle it would be the largest U.S.-Tokyo O&D gateway without nonstop service to Haneda. Seattle would also be the largest west coast business center without Haneda service, placing Seattle and the Pacific Northwest region at a disadvantage to the well-served cities of San Francisco and Los Angeles (to say nothing of Hawaii which currently enjoys 3 of 8 Haneda opportunities). Seattle-Haneda must be maintained for the following reasons:

- Seattle will continue as an important and unique mainland gateway, providing 122,000 annual Tokyo passengers with nonstop access to Haneda.² Intergateway competition will be preserved with San Francisco and Los Angeles which both have two existing Haneda flights.
- 47 cities will receive round-trip connections, and an additional 38 cities will receive one-way connecting service to Haneda via Seattle. Seattle's geographic location provides the largest catchment area and best network coverage of the United States.
- The Pacific Northwest region will maintain its only convenient access to Haneda because the existing west coast gateways are too far south and unreasonably circuitous.
- Delta's growing Seattle network, served with Delta and Delta Connection aircraft, is bringing more traffic and true online connections to the marketplace, improving service and competition for U.S.-Haneda passengers.
- Delta's proposal will preserve and enhance vigorous 3-way competition among the major alliances serving Japan. Delta is the only effective competitor to the United/ANA and American/JAL immunized alliances, both of which have major hub operations at Haneda.
- Unlike American, Delta's service maintains a unique new Haneda gateway at Seattle, rather than duplicating existing Haneda services at Los Angeles. It would be patently unfair for Los Angeles to enjoy three Haneda slot pairs while Seattle would be relegated to none.

Reconsideration of December 22, 2014, and, for the reasons set forth in that document, urges that further proceedings be stayed pending reconsideration of Order 2014-12-9. Order 2014-12-9 is arbitrary and capricious and contrary to law, and any final decision by the Department to reallocate the slots would be unlawful for the same reasons.

² MIDT data adjusted to account for direct sales.

- Unlike Hawaiian, Delta will use this limited Haneda opportunity to serve U.S. citizens and businesses, rather than transport Japanese tourists in the well served Haneda-Hawaii marketplace. Similar to American's proposal, Hawaii already has three nonstop Haneda flights while an award to Hawaiian would deprive the Pacific Northwest of its only nonstop flight.

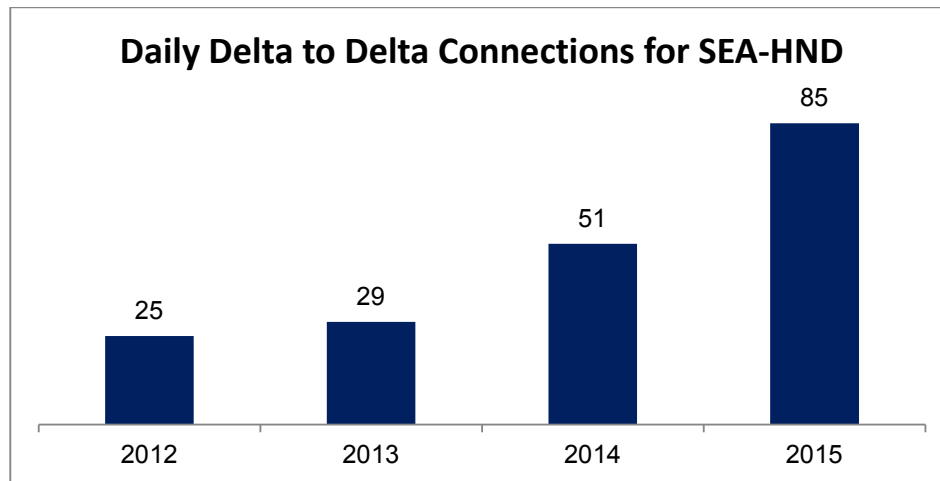
When the Department granted Delta Seattle-Haneda slots it made a number of important public interest findings confirming the benefits of Seattle-Haneda service. See, Show Cause Order 2012-11-12 at pp. 5-6; confirmed by Final Order 2013-2-4. Particularly given that Delta has committed to a full pattern of daily service beginning on March 29, there is no justifiable basis for removing the slots from Seattle.

2. Delta is diligently working to develop the Seattle-Haneda route.

Delta is moving aggressively to develop Seattle as a hub with new Delta and Delta Connection-operated service, both domestic and international. While – as the Department has been kept well aware -- it has been challenging to establish Haneda service, as we continue to implement our Seattle strategy we have seen passenger traffic and profitability surge. In fact, Delta's Summer Season SEA-HND 2014 performance improved by *54% percent* year-over-year. Encouraged by this strong summer 2014 performance, Delta has allocated aircraft, published schedules and is actively selling a full pattern of daily Seattle-Haneda service in summer 2015 and beyond.

A major contributor to the improved success of the Seattle-Haneda flight is the increased Delta-operated connecting service into Seattle, which grew to 51 daily departures in August 2014, will grow again to 85 in 2015, and is anticipated to continue growing in 2016. This

growth represents an increase of 240 percent in Seattle flights, which will provide the necessary feed needed to make the Seattle-Haneda service a continued success:



3. American's critique of Delta's Haneda Service is hypocritical and without merit.

While American is highly critical of Delta's effort to make adjustments to its network to establish viable Haneda service – it conveniently ignores its own failed bid and “broken promises” to operate nonstop service from New York (JFK). American also made major reductions in its JFK-HND service – reducing its service pattern similar to Delta – (DL-A-301) before abandoning the route entirely in November 2013. American did not so much as bother to seek authority for a new gateway (such as Los Angeles). By contrast Delta has worked diligently and persistently to find a workable Haneda solution until that airport can finally be brought under open skies.

We note the irony of American's exaggerated claim that DOT should strip Delta of its SEA-HND slot for “appalling underuse” in the off-peak winter schedule, while American has regularly made its own seasonal adjustments rendering limited international frequencies unused for 90 days or more over a period spanning more than a decade. Exhibit DL-A-303. No action was taken by the Department to recall American's unused frequencies. The Department should squarely reject American's call for a different and unprecedented result here.

All carriers make adjustments to their schedules and aircraft size -- which is a normal, expected commercial response to observed market conditions. It is no secret that developing service from the mainland U.S. has been challenging; in fact, on several occasions Delta met with the Department staff and advised them that temporary seasonal reductions might be necessary. Delta never received any objections in the past to its seasonal reductions, and was given no notice that reduced winter operation this season could or would trigger a summary review of Seattle's Haneda service.

4. American Misrepresents the Competitive Environment on the Los Angeles-Tokyo and Seattle-Tokyo Routes.

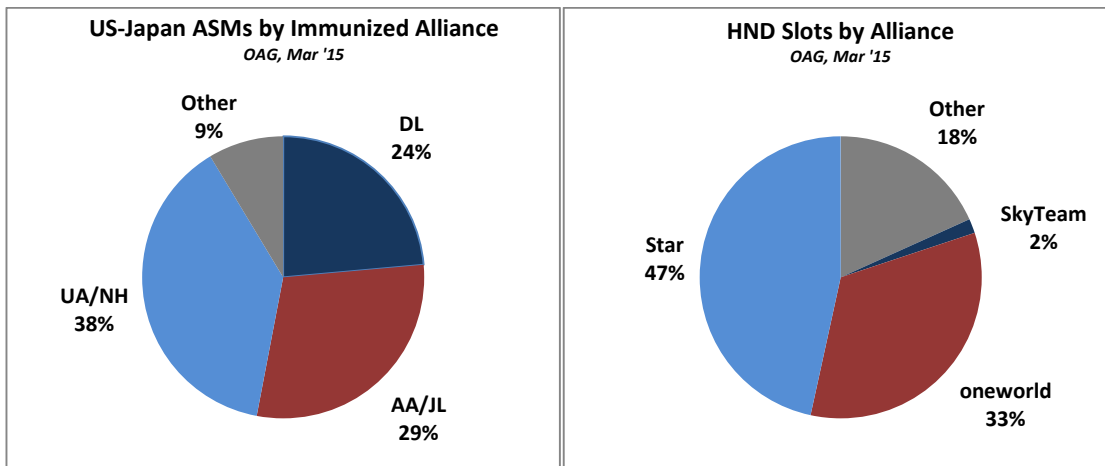
American claims that Los Angeles-Tokyo is under-served relative to Seattle-Tokyo, with a market that is five times larger, but has only twice the number of flights. Yet, American inexplicably fails to account for two of the eight widebody flights operating the Los Angeles-Tokyo route – specifically Delta's LAX-NRT flight and ANA's LAX-HND flight. *Compare* Exhibit AA-212, DL-A-101. When corrected for this gross error, American's claims about the "underserved" nature of the Los Angeles market fall apart –LAX and SEA have roughly the same number of seats per Tokyo passenger. DL-A-102. And, if Seattle were to lose its only Haneda flight to add a third Haneda service at Los Angeles, Seattle would be underserved relative to LAX.

American's claim that Delta "competes" with itself on LAX and SEA routes to Tokyo misses the point and is incorrect. While Haneda and Narita both serve the metropolitan Tokyo region, Haneda accesses the key downtown business region and operates in a completely different time channel from Delta's Narita services – improving service and choice for consumers. DL-A-104. And, as discussed below in section 6, American's current LAX-NRT and proposed LAX-HND flights would compete with themselves in the same manner – unless American follows the course it has signaled by eliminating its LAX-NRT flight.

Finally, contrary to American's claims, U.S.-Tokyo routes – and Seattle in particular – experience significant variations in seasonal demand. There is 35% less demand for Seattle-Tokyo in the winter than summer months. DL-A-302. However, as noted above, Delta's expanding Seattle hub network will work to offset these seasonal variations in the future.

5. American already has access to Haneda via its partnership with JAL.

American's claim that it "is the only U.S. airline serving Japan without Haneda authority" is false. (p.10). In fact, American enjoys important advantages with a large partner and major hub at Haneda. To that end, American conveniently overlooks that it is operating across the Pacific as one airline with JAL, one of the largest competitors in the U.S.-Japan marketplace with a huge incumbent position at Haneda:



American currently enjoys the benefit of two U.S.-Haneda slots Haneda under its joint venture with JAL, which American and JAL certify they have implemented. Exhibit DL-2. American's stated objective in forming its immunized alliance was to create a metal-neutral joint venture in which each carrier was *indifferent* to the actual operator of the aircraft:

The Joint Applicants seek approval for a highly-integrated, revenue-sharing joint venture that will strengthen their alliance by eliminating each carrier's economic incentive to maximize its own revenue. Only the closer cooperation made possible through a joint venture based on metal neutrality – or indifference as to which airline actually carries a customer – will maximize the consumer benefits that immunized alliances make

possible. This is because metal neutrality removes each carrier's incentive to act opportunistically in ways that inure to its own short-term financial advantage, to the detriment of the efficiencies and consumer benefits that could otherwise be delivered by the alliance. American/JAL Antitrust Immunity Application, Docket DOT-OST-2010-0034, p.7.

Today, American codeshares on each and every one of JAL's U.S.-Japan flights, including JAL's HND-San Francisco and highly lucrative HND-Honolulu flights. When the Department approved the American/JAL immunized alliance it stated: "The intended commercial effects of the ATI Applicants' respective joint business agreements are similar to those resulting from a merger." (Japan ATI Order 2010-10-4 at 5). If American and JAL are not working together to jointly realize the full benefit of JAL's two Haneda flights, then they have failed to realize the claimed benefits of their ATI alliance and should no longer be entitled to antitrust immunity.³

Delta service at Seattle will continue progress toward three-way alliance competition on U.S.-Haneda routes and is essential to preventing further deterioration of the competitive market structure. The two immunized U.S.-Japanese alliances have inherent advantages over Delta, which does not have a Japan alliance partner. As a SkyTeam member and major U.S.-Japan competitor, Delta is the only carrier capable of offering a competitive alternative to the west coast Haneda services of oneworld (JL) and Star (UA) at San Francisco and Star (ANA) at Los Angeles. The DOT has consistently sought to promote inter-alliance competition.⁴ Maintaining

³ Moreover, *American and JAL could serve Los Angeles-Haneda today* simply by moving JAL's SFO-HND flight to LAX. Given the recently authorized United SFO-HND service, there is a strong possibility that the oneworld carriers might make this decision on their own initiative. It would make absolutely no sense (and contradict the Department's stated public interest objectives for U.S.-Haneda flying) to strip Delta of its SEA-HND slots that are used to operate from the Pacific Northwest to allow American/JAL to pile on more flights on the already saturated LAX-HND route.

⁴ See Order 2009-7-10, page 17 ("We also examined the changes in inter-alliance competition.... The ability of the 'non-hub' alliance members to compete at [a hub of another alliance] can benefit both business and leisure passengers."); Order 2010-2-8, page 28 ("[E]nhanced inter-alliance competition is beneficial for consumers across many markets....")

Delta's SEA-HND service helps to promote the Department's public interest objectives. Conversely, the loss of a slot pair would marginalize Delta in the U.S.-Haneda marketplace, leaving Delta with just a single daily flight to compete against the multiple daily trans-Pacific flights and large Haneda hubs operated by Star and oneworld. This would increase market dominance by the U.S.-Japan ATI alliances and undermine Delta's ability to compete in the U.S.-Tokyo and U.S.-Japan marketplace.

6. American's claimed new capacity benefits are illusory.

American's exhibits filed with its original Application showed that American assigned the same flight number to its proposed LAX-HND flight as its existing LAX-NRT flight. Although American has now attempted to cover this up by assigning new flight numbers, American avoids mentioning and makes no commitment to maintain LAX-NRT service despite being called out on it in the initial round of pleadings. Furthermore, American's gimmick of proposing an unrealistic 60 day startup in a long haul widebody market is further indication that American intends to swap the Tokyo markets operated with its existing equipment. Thus, it would appear that American intends to drop its own LAX-NRT service just as it canceled its own JFK-NRT service when it launched JFK-HND and left its partner JAL to fly JFK-NRT. American is playing a zero sum game. Allowing American to switch its LAX service from one airport to another (particularly when LAX has two existing Haneda flights) provides no public interest benefits compared with the substantial benefits generated by maintaining Seattle as a unique gateway serving the Pacific Northwest. By contrast, Delta will continue to serve NRT from Seattle, and Delta's Haneda flight represents true incremental capacity in the marketplace to the benefit of consumers.

7. Maintaining the Pacific Northwest's only Haneda service a superior U.S. public interest use than using 4 of 8 Haneda slots to benefit Japanese tourists.

Delta's proposal to maintain the only Haneda service to Seattle and the Pacific Northwest region deserves priority over Hawaiian's proposal to add a fourth Haneda-Hawaii

flight at Kona. Hawaii already receives three nonstop Haneda services operated by Hawaiian Airlines, JAL and ANA. Combined, these services represent 37.5% of all available Haneda slots. If Hawaiian's Kona proposal were granted, 50% of Haneda slots (four of eight) would be operated to the Hawaiian Islands. The overwhelming majority of passengers on existing Tokyo-Hawaii flights (95%) are Japanese tourists (DL-A-401), and the Tokyo-Kona market is even more heavily Japanese-originating (96%). DL-A-402. It is not in the public interest to have so many limited entry opportunities concentrated in Hawaii to the exclusion of a Pacific Northwest gateway that provides service to U.S. citizens and U.S. businesses seeking access to Tokyo's preferred close-in airport.

Hawaiian claims that "access to Kona is only available through Honolulu; as such the availability of nonstop service will be attractive to Japanese-originating tourists." (p.6). Yet, Hawaiian ignores the open entry opportunities available to Kona from Tokyo Narita – a major achievement under the open skies agreement the United States secured with Japan. Haneda is the preferred business airport serving downtown Tokyo. And, as Japan's airport policies continue to evolve it is likely that more leisure and charter traffic will shift to Narita. U.S. customers and U.S. businesses should receive public interest priority over Japan's tourists. Moreover, Hawaiian should not enjoy a U.S. flag monopoly on Haneda-Hawaii service. Instead of offering Narita-Kona service which it is free to do today, Hawaiian seeks only to operate from the constrained Haneda airport.

By contrast, in order to take on the American/JAL and United/ANA joint ventures and maintain effective 3-way alliance competition from key U.S. business markets, it is vital for Delta to maintain service at Seattle and grow its U.S.-Haneda network. Tokyo-Kona traffic is point-to-point Japanese originating leisure traffic and Hawaiian can point to no valid reason these passengers cannot be accommodated by it at Narita.

8. Conclusion

Delta is demonstrably and deeply committed to growing its Seattle hub and to daily flying of the Seattle-Haneda route beginning this March and continuing through the winter and summer seasons beyond. It is manifestly in the public interest to allow Delta to do so, rather than to revoke Seattle's only Haneda connection in favor of the over-served Los Angeles or Hawaii gateways.

Respectfully submitted,



Alexander Van der Bellen
Managing Director, Regulatory and
International Affairs
& Associate General Counsel
DELTA AIR LINES, INC.

Section I: American's Misstatement of the Tokyo-Los Angeles and Tokyo-Seattle Competitive Environment

Section II: Seattle Provides a Superior Connecting Gateway to Haneda

Section III: American's Failure to Deliver on its Haneda Commitments

Section IV: Scarce Haneda Slots Should Benefit U.S. Public, Not Just Japanese Tourists

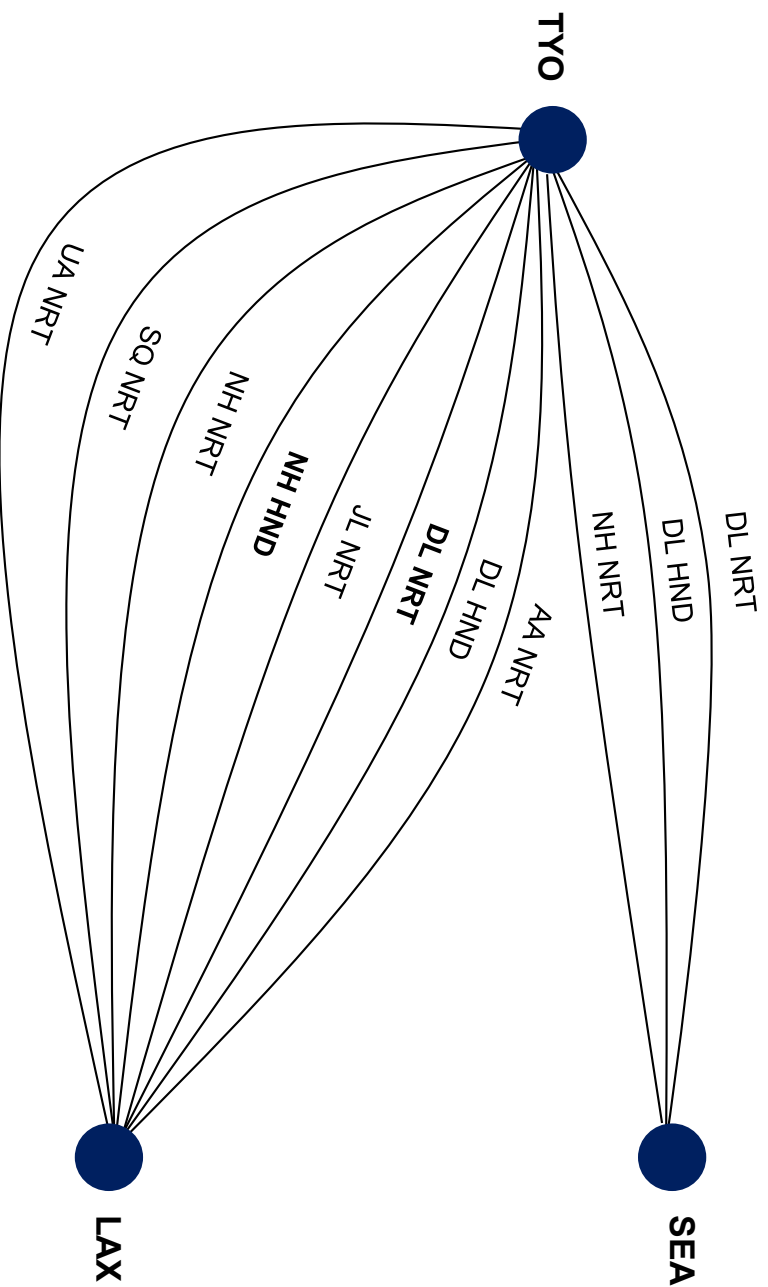


**Section I: American's Misstatement of the Tokyo-Los Angeles and
Tokyo-Seattle Competitive Environment**

American Misrepresents the Competitive Los Angeles-Tokyo Environment



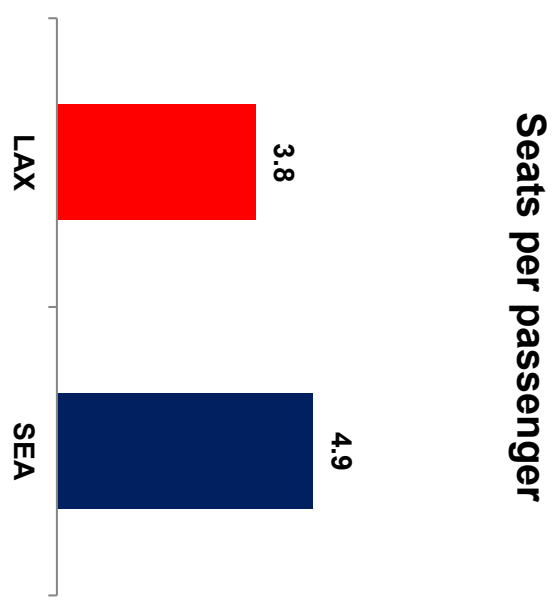
- AA claims that Los Angeles-Tokyo O&D is 5x larger than Seattle-Tokyo yet has only twice (6x daily) the number of flights (Exhibit AA-212).
- In reality, Los Angeles-Tokyo is served 8x daily and has been for the entirety of 2014.
- American inexplicably fails to list Delta's LAX-Narita and ANA's LAX-Haneda services.
- The Actual competitive landscape for Seattle-Tokyo and Los Angeles-Tokyo is as follows:



American Misrepresents the Competitive Los Angeles-Tokyo Environment

- When these additional services are included, the ratio of seats to MIDD O&D passengers in the Seattle-Tokyo and Los Angeles Tokyo markets are nearly equal:

| | | | |
|--------------------|-----------|--------------------|---------|
| LAX-TYO Passengers | 423,525 | SEA-TYO Passengers | 93,892 |
| LAX-TYO Seats | 1,648,857 | SEA-TYO Seats | 461,611 |

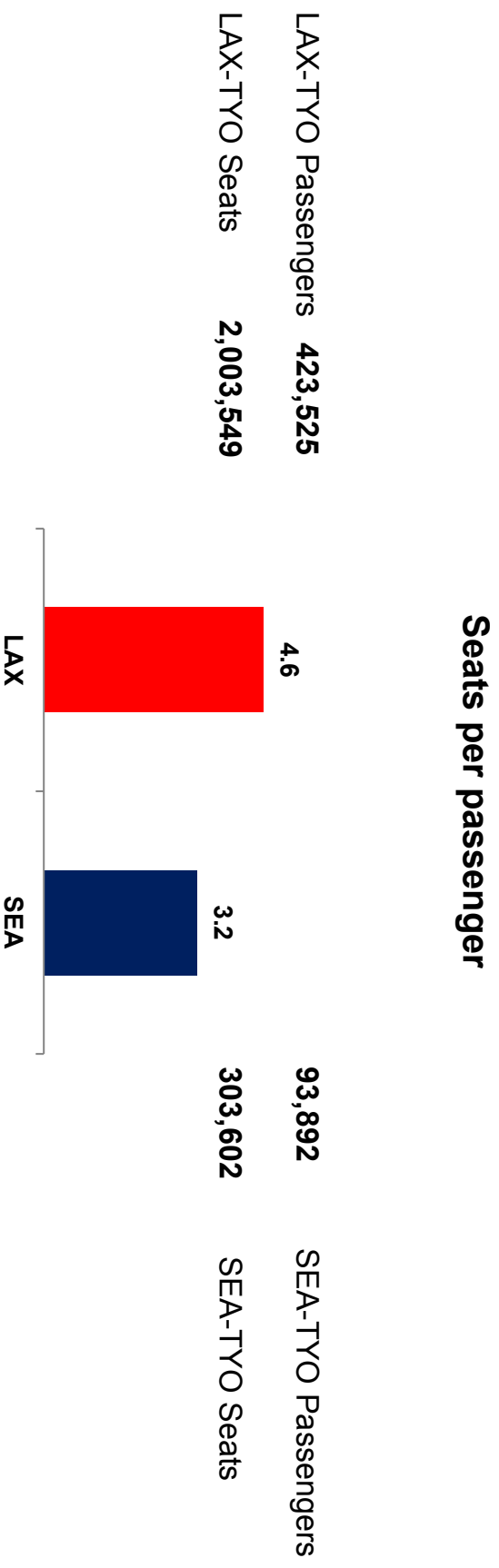


- American could increase the number of seats available in the LAX-TYO market by upgauging their LAX-NRT service to a 777-300ER rather than stripping the Pacific Northwest of its only Haneda gateway.

American Misrepresents the Competitive Los Angeles-Tokyo Environment



- Under AA's proposal to deprive Seattle of its only Haneda flight, the ratio would skew heavily towards Los Angeles, resulting in under- service for Seattle:



- Seattle would be served by even fewer seats per passenger than LAX is currently, which American portrays as a severely underserved market.
- American's proposal would also inconvenience the traveling public as it would remove the most convenient US-HND gateway, depriving most of the nation of non-circuitous connections at Seattle.

American Continues to Claim that Flights to Narita and Haneda from the Same Gateways are Duplicative; Delta Strives to Offer Customers Choices and Flexibility at Seattle and Los Angeles



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Exhibit DL-A-104

Page 1 of 1

- Delta's SEA-Tokyo flights compliment each other. SEA-HND allows passengers to access the preferred downtown airport for Tokyo O&D traffic while SEA-NRT connects passengers to Delta's intra-Asia destinations.
- Similarly, LAX-HND and SEA-HND flights compliment each in allowing passengers from different catchment areas access to Haneda. Taking away the SEA-HND flight would deprive Seattle and the Pacific Northwest of convenient options to Haneda.
- American has left unanswered whether they plan to continue flying LAX-NRT if they are awarded the Haneda frequencies at issue.
 - In their initial application, American's proposed LAX-HND service used the same flight numbers as LAX-NRT.
 - American's proposed 60-day startup time is unreasonable for a new, widebody international route unless they plans to transfer bookings from LAX-NRT to LAX-HND.
 - If American decides it would rather not "compete with itself", and cancels LAX-NRT, any seat access benefits to consumers is Los Angeles would disappear and Seattle and the Pacific Northwest would lose their only gateway to Haneda.



**Section II: Seattle Provides a Superior Connecting Gateway to
Haneda**

Seattle is Geographically Positioned to Optimally Connect U.S. Traffic to Haneda

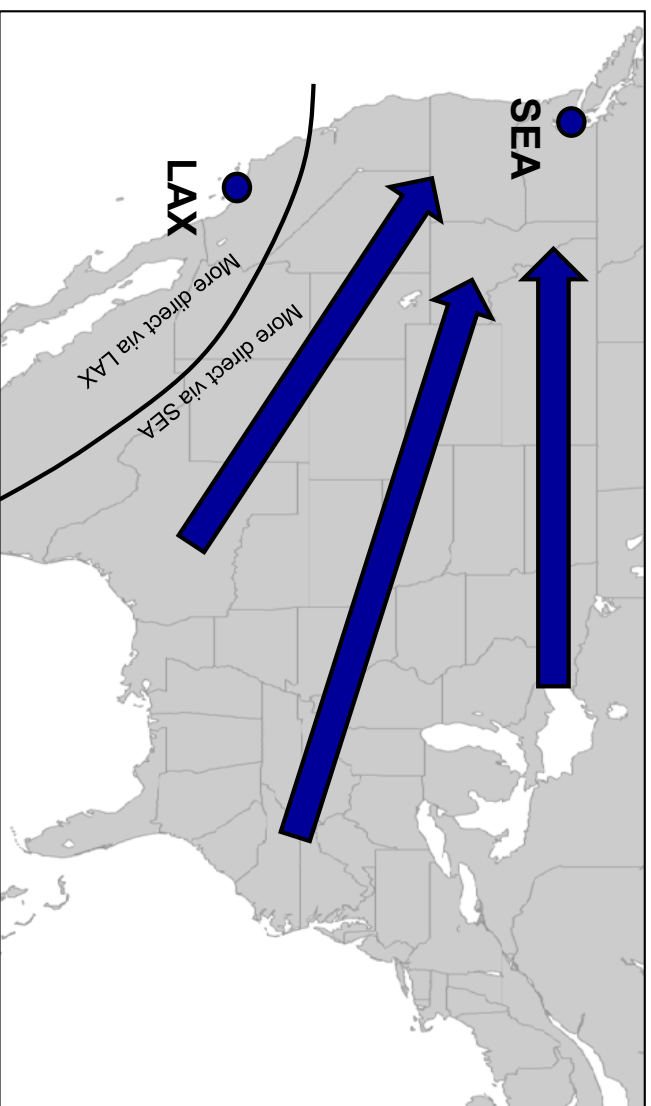


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Exhibit DL-A-201

Page 1 of 1

- Seattle connections are less circuitous versus other West Coast gateways for points across the US—including the Pacific Northwest, the Southeast and the East Coast.

**SEA is a more direct route to HND
for the most US cities**



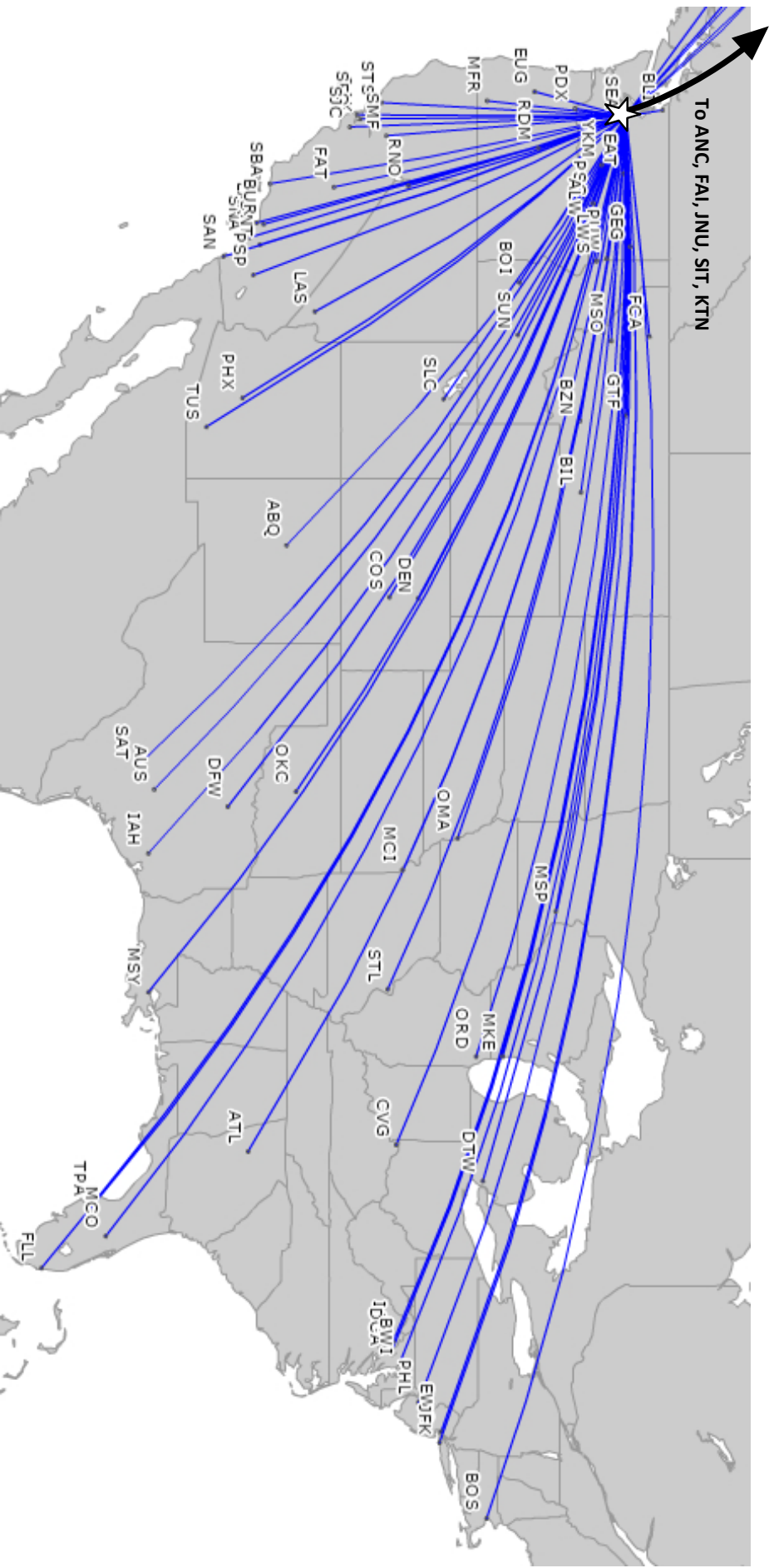
- The vast majority of American's listed "Unique Connection Markets" would require circuitous flights to connect on to AA's proposed LAX-HND flight.

Seattle is an Ideal West Coast Gateway to Haneda

Delta and Alaska Provide Nonstop Service to 74 U.S. Points



Haneda



Note: Includes service operated by Alaska/Horizon
Source: July 2015 schedules, Dijo Mi

American's "Unique Connecting Markets" Ignore Delta's Additional Codeshare Partnership with Alaska Airlines that Combined with Delta's Own-Metal Network Connect Seattle to 74 U.S. Points

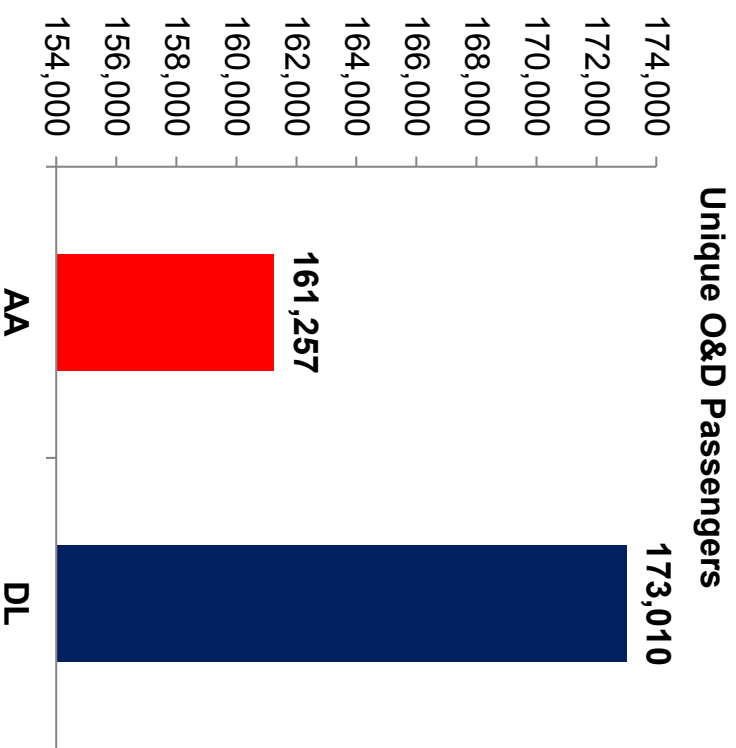


- Of AA's 15 "Unique Connecting Markets" Alaska serves 6 with timings that will conveniently connect passengers to Delta's SEA-HND flight.

| 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 |

★ Points that Alaska serves that connect to DL SEA-HND at least part of the year

Using AA's own methodology shows higher unique O&D passengers for DL's SEA-HND than AA's proposed LAX-HND



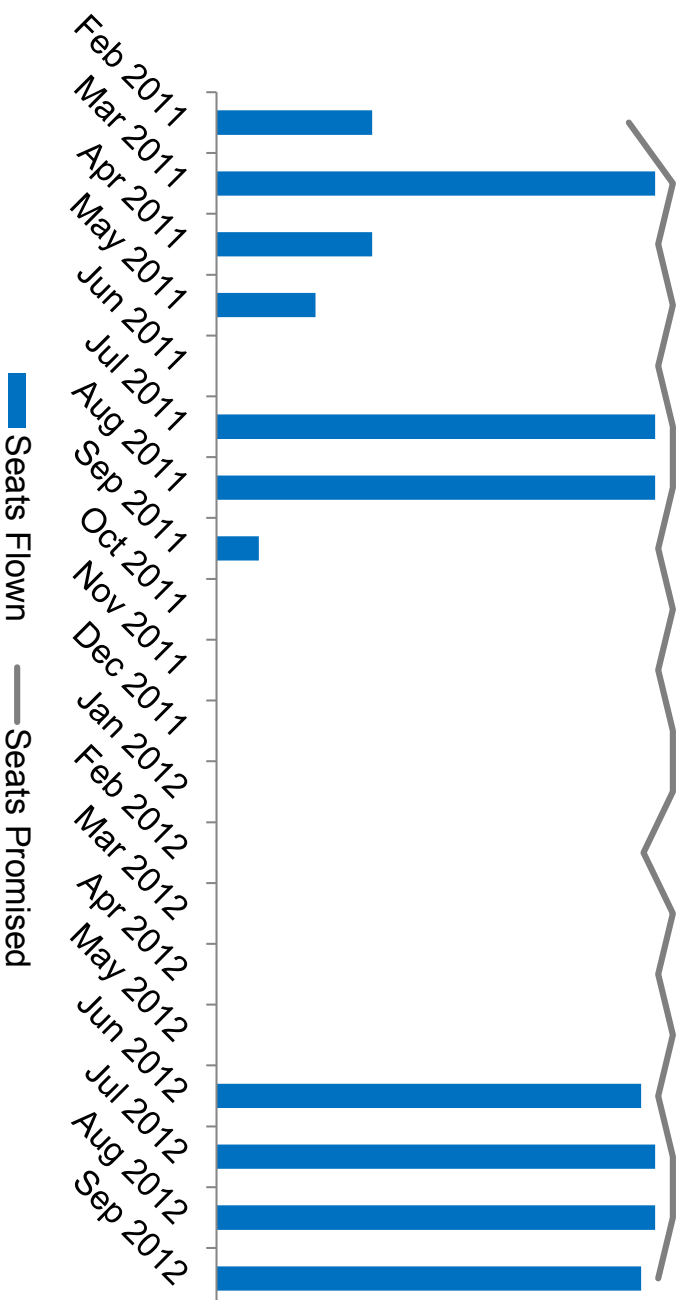


Section III: American Historically Underserved Haneda (and Brazil)

American's Failed New York-Haneda Commitment



- American's proposal to serve JFK-HND committed to DOT to provide 247 daily seats with the following service pattern:



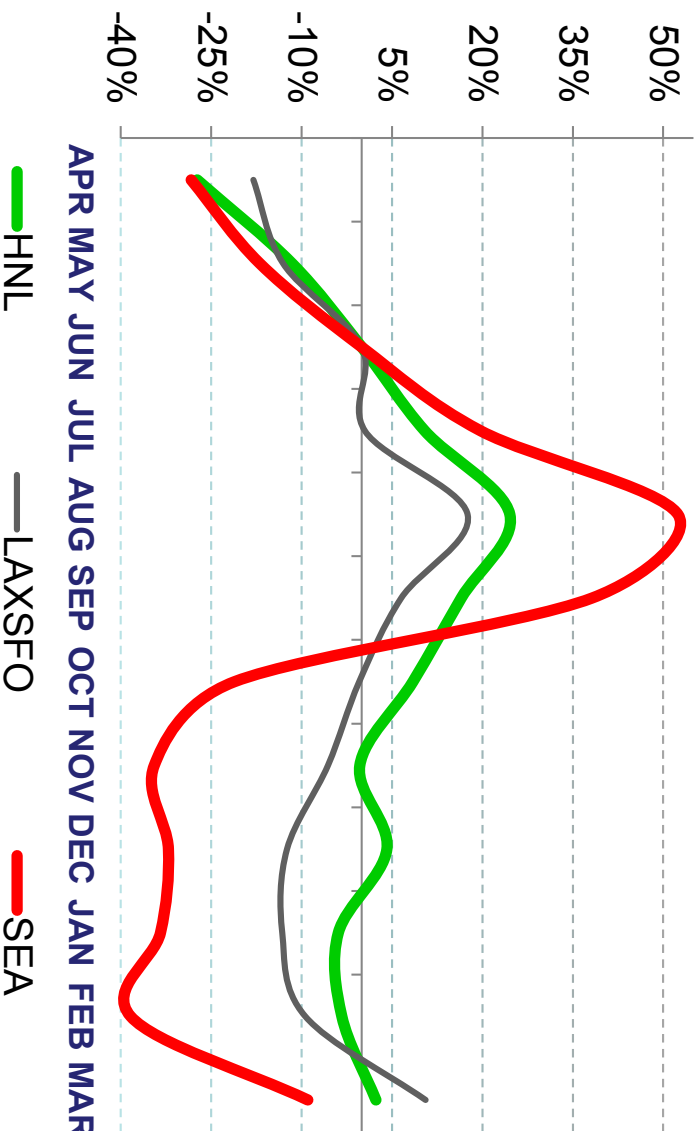
Seattle – Tokyo winter demand is more seasonal than other Haneda gateways



- Seattle – Tokyo winter demand is 35% less than in summer months.
 - Seattle August demand spikes 55% relative June, climbing more than LAX, SFO, or HNL

U.S. – Tokyo demand seasonality

Source: MIDT 2010 – 2013 average indexed to June



U.S. – Tokyo PDEW

| | Sum | Win | % Chg |
|-------------|-------|-------|-------|
| SEA | 163 | 106 | -35% |
| HNL | 1,916 | 1,874 | -2% |
| LAX/ SFO | 967 | 951 | -2% |

American has a Chronic History of Allowing Limited Entry Frequencies to Remain Dormant for Periods of 90 Days or More

AA U.S.-Brazil frequencies 2002-2014

 = periods of frequency underutilization

| Travel Period | Mktg AI | Mon | Tue | Wed | Thu | Fri | Sat | Sun | Ops/Week |
|---------------|---------|-----|-----|-----|-----|-----|-----|-----|----------|
| Jan-02 | AA | 7 | 8 | 8 | 8 | 8 | 8 | 7 | 54 |
| Feb-02 | AA | 7 | 8 | 8 | 8 | 8 | 8 | 7 | 54 |
| Mar-02 | AA | 7 | 7 | 7 | 8 | 8 | 8 | 7 | 52 |
| Apr-02 | AA | 7 | 7 | 7 | 8 | 8 | 8 | 7 | 52 |
| May-02 | AA | 7 | 7 | 7 | 8 | 8 | 8 | 7 | 52 |
| Jun-02 | AA | 8 | 9 | 8 | 9 | 8 | 8 | 9 | 59 |
| Jul-02 | AA | 8 | 9 | 8 | 9 | 8 | 8 | 9 | 59 |
| Aug-02 | AA | 8 | 9 | 8 | 9 | 8 | 8 | 9 | 59 |
| Sep-02 | AA | 8 | 8 | 9 | 9 | 9 | 9 | 9 | 61 |
| Oct-02 | AA | 6 | 5 | 6 | 6 | 5 | 6 | 6 | 40 |
| Nov-02 | AA | 6 | 5 | 6 | 6 | 5 | 6 | 6 | 40 |
| Dec-02 | AA | 6 | 5 | 6 | 6 | 5 | 6 | 6 | 40 |
| Jan-03 | AA | 7 | 6 | 6 | 7 | 6 | 7 | 6 | 45 |
| Feb-03 | AA | 7 | 6 | 6 | 7 | 6 | 7 | 6 | 45 |
| Mar-03 | AA | 7 | 6 | 6 | 7 | 6 | 7 | 6 | 45 |
| Apr-03 | AA | 7 | 6 | 6 | 6 | 6 | 6 | 6 | 43 |
| May-03 | AA | 5 | 6 | 6 | 6 | 5 | 6 | 6 | 40 |
| Jun-03 | AA | 5 | 6 | 6 | 6 | 5 | 6 | 6 | 40 |
| Jul-03 | AA | 6 | 6 | 6 | 6 | 6 | 6 | 6 | 42 |
| Aug-03 | AA | 6 | 6 | 6 | 6 | 6 | 6 | 6 | 42 |
| Sep-03 | AA | 6 | 6 | 6 | 6 | 6 | 6 | 6 | 42 |
| Oct-03 | AA | 6 | 6 | 6 | 6 | 6 | 6 | 6 | 42 |
| Nov-03 | AA | 6 | 6 | 6 | 6 | 6 | 6 | 6 | 42 |
| Dec-03 | AA | 6 | 6 | 6 | 6 | 6 | 6 | 6 | 42 |
| Jan-04 | AA | 7 | 7 | 7 | 7 | 8 | 8 | 7 | 51 |
| Feb-04 | AA | 7 | 7 | 7 | 7 | 8 | 8 | 7 | 51 |
| Mar-04 | AA | 7 | 7 | 7 | 7 | 8 | 8 | 7 | 51 |
| Apr-04 | AA | 7 | 6 | 6 | 6 | 7 | 7 | 7 | 46 |
| May-04 | AA | 7 | 6 | 6 | 7 | 7 | 7 | 7 | 47 |
| Jun-04 | AA | 7 | 8 | 8 | 8 | 8 | 8 | 7 | 54 |
| Jul-04 | AA | 7 | 8 | 8 | 8 | 8 | 8 | 7 | 54 |
| Aug-04 | AA | 7 | 8 | 8 | 8 | 8 | 8 | 7 | 54 |
| Sep-04 | AA | 7 | 6 | 7 | 6 | 8 | 7 | 8 | 49 |
| Oct-04 | AA | 7 | 6 | 7 | 6 | 8 | 7 | 8 | 49 |
| Nov-04 | AA | 7 | 6 | 7 | 6 | 8 | 7 | 8 | 49 |
| Dec-04 | AA | 7 | 8 | 8 | 8 | 8 | 8 | 7 | 54 |

American has a Chronic History of Allowing Limited Entry Frequencies to Remain Dormant for Periods of 90 Days or More



Docket DOT-OST-2010-0018
Exhibit DL-A-303

| Travel Period | Mktg AI | Mon | Tue | Wed | Thu | Fri | Sat | Sun | Ops/Week |
|---------------|---------|-----|-----|-----|-----|-----|-----|-----|----------|
| Jan-05 | AA | 7 | 8 | 8 | 8 | 8 | 8 | 7 | 54 |
| Feb-05 | AA | 7 | 8 | 8 | 8 | 8 | 8 | 7 | 54 |
| Mar-05 | AA | 7 | 8 | 8 | 8 | 8 | 8 | 7 | 54 |
| Apr-05 | AA | 7 | 8 | 8 | 8 | 8 | 8 | 7 | 54 |
| May-05 | AA | 7 | 6 | 6 | 7 | 7 | 7 | 7 | 47 |
| Jun-05 | AA | 7 | 8 | 7 | 8 | 8 | 8 | 8 | 54 |
| Jul-05 | AA | 7 | 8 | 7 | 8 | 8 | 8 | 8 | 54 |
| Aug-05 | AA | 7 | 8 | 7 | 8 | 8 | 8 | 8 | 54 |
| Sep-05 | AA | 7 | 6 | 6 | 7 | 8 | 8 | 7 | 49 |
| Oct-05 | AA | 7 | 6 | 6 | 7 | 8 | 8 | 7 | 49 |
| Nov-05 | AA | 7 | 8 | 7 | 8 | 8 | 8 | 8 | 54 |
| Dec-05 | AA | 6 | 7 | 6 | 7 | 7 | 7 | 7 | 47 |
| Jan-06 | AA | 8 | 8 | 8 | 9 | 8 | 9 | 9 | 59 |
| Feb-06 | AA | 7 | 7 | 7 | 8 | 7 | 8 | 8 | 52 |
| Mar-06 | AA | 6 | 7 | 6 | 7 | 7 | 7 | 7 | 47 |
| Apr-06 | AA | 6 | 5 | 5 | 7 | 7 | 7 | 6 | 43 |
| May-06 | AA | 6 | 5 | 5 | 7 | 7 | 7 | 6 | 43 |
| Jun-06 | AA | 6 | 5 | 5 | 7 | 7 | 7 | 7 | 44 |
| Jul-06 | AA | 6 | 7 | 6 | 7 | 7 | 7 | 7 | 47 |
| Aug-06 | AA | 6 | 7 | 6 | 7 | 7 | 7 | 7 | 47 |
| Sep-06 | AA | 6 | 5 | 5 | 5 | 6 | 6 | 6 | 39 |
| Oct-06 | AA | 6 | 5 | 5 | 5 | 6 | 6 | 6 | 39 |
| Nov-06 | AA | 6 | 5 | 5 | 7 | 6 | 7 | 7 | 43 |
| Dec-06 | AA | 7 | 7 | 7 | 8 | 8 | 8 | 8 | 53 |
| Jan-07 | AA | 7 | 8 | 7 | 8 | 8 | 8 | 8 | 54 |
| Feb-07 | AA | 7 | 7 | 7 | 7 | 7 | 7 | 7 | 49 |
| Mar-07 | AA | 6 | 7 | 7 | 7 | 7 | 7 | 6 | 47 |
| Apr-07 | AA | 6 | 5 | 5 | 6 | 6 | 6 | 6 | 40 |
| May-07 | AA | 6 | 5 | 5 | 6 | 6 | 6 | 6 | 40 |
| Jun-07 | AA | 6 | 5 | 5 | 8 | 8 | 8 | 7 | 47 |
| Jul-07 | AA | 6 | 8 | 7 | 8 | 8 | 8 | 7 | 52 |
| Aug-07 | AA | 6 | 7 | 6 | 7 | 7 | 7 | 7 | 47 |
| Sep-07 | AA | 6 | 5 | 5 | 5 | 6 | 6 | 6 | 39 |
| Oct-07 | AA | 6 | 5 | 5 | 5 | 6 | 6 | 6 | 39 |
| Nov-07 | AA | 7 | 7 | 7 | 7 | 7 | 6 | 6 | 47 |
| Dec-07 | AA | 7 | 7 | 7 | 7 | 8 | 8 | 7 | 51 |

American has a Chronic History of Allowing Limited Entry Frequencies to Remain Dormant for Periods of 90 Days or More

| Travel Period | Mktg AI | Mon | Tue | Wed | Thu | Fri | Sat | Sun | Ops/Week |
|---------------|---------|-----|-----|-----|-----|-----|-----|-----|----------|
| Jan-08 | AA | 8 | 8 | 8 | 7 | 8 | 8 | 7 | 54 |
| Feb-08 | AA | 7 | 7 | 7 | 6 | 7 | 7 | 6 | 47 |
| Mar-08 | AA | 7 | 7 | 7 | 6 | 7 | 7 | 5 | 46 |
| Apr-08 | AA | 5 | 6 | 5 | 6 | 6 | 6 | 6 | 40 |
| May-08 | AA | 5 | 6 | 5 | 6 | 6 | 6 | 6 | 40 |
| Jun-08 | AA | 6 | 8 | 6 | 8 | 7 | 8 | 8 | 51 |
| Jul-08 | AA | 7 | 8 | 7 | 8 | 7 | 8 | 8 | 53 |
| Aug-08 | AA | 6 | 7 | 6 | 7 | 7 | 7 | 7 | 47 |
| Sep-08 | AA | 6 | 7 | 6 | 7 | 6 | 7 | 6 | 45 |
| Oct-08 | AA | 6 | 7 | 6 | 7 | 6 | 6 | 6 | 44 |
| Nov-08 | AA | 8 | 9 | 8 | 8 | 8 | 9 | 7 | 57 |
| Dec-08 | AA | 8 | 9 | 8 | 9 | 10 | 10 | 10 | 64 |
| Jan-09 | AA | 9 | 11 | 10 | 9 | 10 | 10 | 10 | 69 |
| Feb-09 | AA | 8 | 8 | 8 | 8 | 9 | 9 | 9 | 59 |
| Mar-09 | AA | 8 | 8 | 7 | 8 | 8 | 9 | 8 | 56 |
| Apr-09 | AA | 6 | 8 | 7 | 7 | 7 | 8 | 7 | 50 |
| May-09 | AA | 6 | 8 | 7 | 7 | 7 | 8 | 7 | 50 |
| Jun-09 | AA | 6 | 8 | 7 | 8 | 8 | 9 | 9 | 55 |
| Jul-09 | AA | 7 | 9 | 6 | 10 | 7 | 10 | 9 | 58 |
| Aug-09 | AA | 7 | 9 | 6 | 10 | 7 | 10 | 9 | 58 |
| Sep-09 | AA | 6 | 6 | 6 | 6 | 6 | 8 | 7 | 45 |
| Oct-09 | AA | 6 | 6 | 6 | 6 | 6 | 8 | 7 | 45 |
| Nov-09 | AA | 6 | 7 | 6 | 8 | 8 | 9 | 9 | 53 |
| Dec-09 | AA | 8 | 8 | 8 | 8 | 8 | 10 | 9 | 59 |
| Jan-10 | AA | 8 | 9 | 8 | 8 | 8 | 10 | 9 | 60 |
| Feb-10 | AA | 8 | 9 | 8 | 8 | 8 | 9 | 9 | 59 |
| Mar-10 | AA | 8 | 8 | 8 | 8 | 8 | 9 | 9 | 58 |
| Apr-10 | AA | 7 | 8 | 7 | 8 | 7 | 8 | 7 | 52 |
| May-10 | AA | 7 | 8 | 7 | 8 | 7 | 8 | 7 | 52 |
| Jun-10 | AA | 7 | 8 | 7 | 9 | 8 | 9 | 8 | 56 |
| Jul-10 | AA | 8 | 10 | 8 | 9 | 9 | 9 | 9 | 62 |
| Aug-10 | AA | 8 | 10 | 8 | 9 | 9 | 9 | 8 | 61 |
| Sep-10 | AA | 7 | 9 | 7 | 9 | 7 | 9 | 7 | 55 |
| Oct-10 | AA | 7 | 9 | 7 | 9 | 7 | 9 | 7 | 55 |
| Nov-10 | AA | 7 | 9 | 7 | 9 | 7 | 9 | 7 | 55 |
| Dec-10 | AA | 9 | 9 | 10 | 9 | 10 | 11 | 11 | 69 |

American has a Chronic History of Allowing Limited Entry Frequencies to Remain Dormant for Periods of 90 Days or More



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| Travel Period | Mktg AI | Mon | Tue | Wed | Thu | Fri | Sat | Sun | Ops/Week |
|---------------|---------|-----|-----|-----|-----|-----|-----|-----|----------|
| Jan-11 | AA | 10 | 11 | 11 | 11 | 11 | 12 | 11 | 77 |
| Feb-11 | AA | 10 | 11 | 11 | 10 | 10 | 12 | 11 | 75 |
| Mar-11 | AA | 9 | 10 | 10 | 10 | 10 | 12 | 11 | 72 |
| Apr-11 | AA | 7 | 9 | 9 | 10 | 9 | 11 | 9 | 64 |
| May-11 | AA | 7 | 9 | 9 | 10 | 9 | 11 | 9 | 64 |
| Jun-11 | AA | 7 | 9 | 9 | 10 | 10 | 11 | 10 | 66 |
| Jul-11 | AA | 10 | 11 | 10 | 10 | 10 | 11 | 10 | 72 |
| Aug-11 | AA | 10 | 11 | 10 | 10 | 10 | 11 | 10 | 72 |
| Sep-11 | AA | 7 | 9 | 9 | 10 | 9 | 11 | 9 | 64 |
| Oct-11 | AA | 7 | 9 | 9 | 10 | 9 | 11 | 9 | 64 |
| Nov-11 | AA | 7 | 9 | 9 | 10 | 10 | 11 | 10 | 66 |
| Dec-11 | AA | 8 | 11 | 11 | 12 | 13 | 12 | 13 | 80 |
| Jan-12 | AA | 12 | 13 | 13 | 12 | 13 | 12 | 13 | 88 |
| Feb-12 | AA | 12 | 13 | 12 | 11 | 11 | 12 | 11 | 82 |
| Mar-12 | AA | 10 | 12 | 11 | 11 | 11 | 12 | 11 | 78 |
| Apr-12 | AA | 9 | 10 | 9 | 10 | 9 | 11 | 9 | 67 |
| May-12 | AA | 9 | 10 | 9 | 10 | 9 | 11 | 9 | 67 |
| Jun-12 | AA | 9 | 10 | 9 | 12 | 12 | 12 | 12 | 76 |
| Jul-12 | AA | 12 | 13 | 12 | 12 | 12 | 12 | 12 | 85 |
| Aug-12 | AA | 12 | 13 | 12 | 12 | 12 | 12 | 12 | 85 |
| Sep-12 | AA | 10 | 11 | 10 | 11 | 10 | 12 | 10 | 74 |
| Oct-12 | AA | 11 | 12 | 11 | 12 | 11 | 13 | 11 | 81 |
| Nov-12 | AA | 11 | 13 | 12 | 13 | 14 | 14 | 13 | 90 |
| Dec-12 | AA | 13 | 14 | 14 | 16 | 16 | 16 | 15 | 104 |
| Jan-13 | AA | 16 | 15 | 16 | 16 | 16 | 16 | 15 | 110 |
| Feb-13 | AA | 16 | 15 | 16 | 16 | 16 | 16 | 15 | 110 |
| Mar-13 | AA | 15 | 14 | 14 | 15 | 15 | 15 | 14 | 102 |
| Apr-13 | AA | 13 | 12 | 12 | 13 | 13 | 15 | 13 | 91 |
| May-13 | AA | 13 | 12 | 12 | 13 | 13 | 15 | 13 | 91 |
| Jun-13 | AA | 13 | 13 | 15 | 16 | 16 | 16 | 15 | 104 |
| Jul-13 | AA | 16 | 15 | 15 | 16 | 16 | 16 | 15 | 109 |
| Aug-13 | AA | 15 | 15 | 14 | 16 | 15 | 16 | 14 | 105 |
| Sep-13 | AA | 11 | 11 | 11 | 11 | 11 | 14 | 12 | 81 |
| Oct-13 | AA | 12 | 11 | 12 | 12 | 13 | 14 | 13 | 87 |
| Nov-13 | AA | 12 | 11 | 12 | 12 | 13 | 13 | 12 | 85 |
| Dec-13 | AA | 15 | 16 | 15 | 16 | 16 | 16 | 15 | 109 |

American has a Chronic History of Allowing Limited Entry Frequencies to Remain Dormant for Periods of 90 Days or More



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| Travel Period | Mktg AI | Mon | Tue | Wed | Thu | Fri | Sat | Sun | Ops/Week |
|---------------|---------|-----|-----|-----|-----|-----|-----|-----|----------|
| Jan-14 | AA | 16 | 17 | 17 | 17 | 18 | 17 | 17 | 119 |
| Feb-14 | AA | 16 | 17 | 17 | 17 | 18 | 17 | 17 | 119 |
| Mar-14 | AA | 14 | 13 | 13 | 14 | 14 | 15 | 14 | 97 |
| Apr-14 | AA | 14 | 12 | 14 | 13 | 14 | 15 | 14 | 96 |
| May-14 | AA | 16 | 17 | 16 | 17 | 17 | 17 | 16 | 116 |
| Jun-14 | AA | 16 | 16 | 17 | 17 | 17 | 17 | 16 | 116 |
| Jul-14 | AA | 17 | 16 | 17 | 17 | 17 | 17 | 15 | 116 |
| Aug-14 | AA | 17 | 16 | 17 | 17 | 17 | 17 | 15 | 116 |
| Sep-14 | AA | 13 | 12 | 13 | 13 | 13 | 14 | 13 | 91 |
| Oct-14 | AA | 13 | 12 | 13 | 13 | 13 | 15 | 14 | 93 |



**Section IV: Scarce Haneda Slots Should Benefit U.S. Consumers, Not
Just Japanese Tourists**

Scarce Haneda Slots Should Benefit U.S. Consumers, Not Just Japanese Tourists

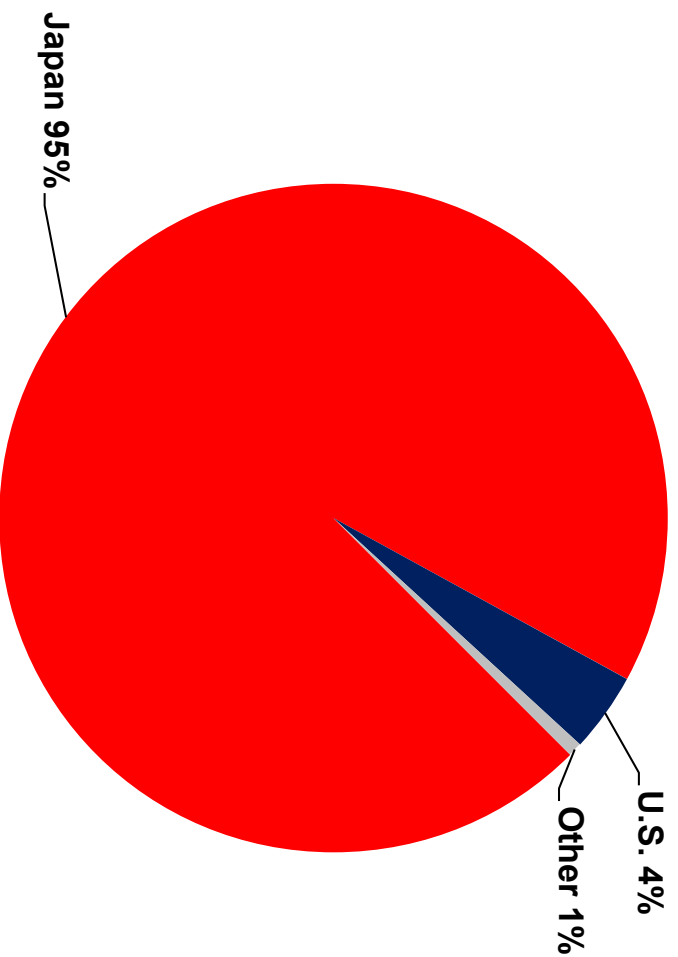


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- Hawaiian’s proposal would overwhelmingly benefit Japanese tourists to Hawaii, while depriving most of the U.S. from the most convenient Haneda connecting gateway at Seattle.

Hawaii-Tokyo O&D Passengers by Point of Sale

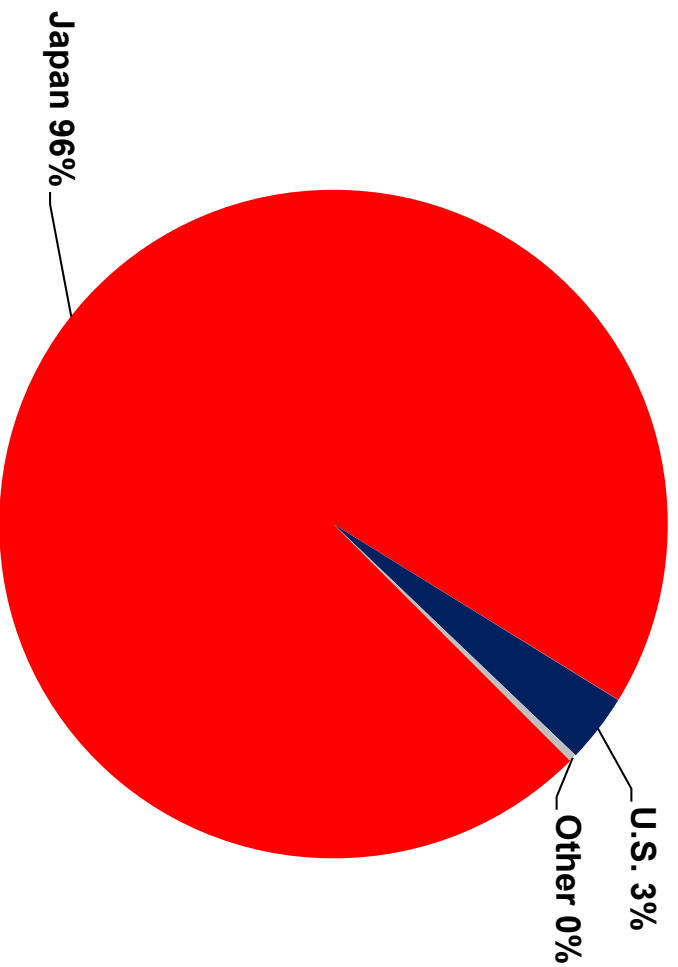


Scarce Haneda Slots Should Benefit U.S. Consumers, Not Just Japanese Tourists



- The imbalance of public benefits is even greater for Kona-Tokyo traffic:

Kona-Tokyo O&D Passengers by Point of Sale



CERTIFICATE OF SERVICE

A copy of the foregoing document has been served this 12th day of January, 2015, upon the following persons via email:

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