

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

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| Application of |) | |
| |) | |
| DELTA AIR LINES, INC. |) | |
| |) | |
| in the matter of 2017 U.S.-Cuba Allocation |) | Docket DOT-OST-2016-0021 |
| Proceeding |) | |
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MOTION OF DELTA AIR LINES, INC.

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September 21, 2018

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MOTION OF DELTA AIR LINES, INC.

Delta Air Lines (“Delta”) respectfully moves for an extension of the start-up deadline as it currently applies to two of seven Miami-Havana frequencies,¹ from October 28, 2018 to March 31, 2019. The five-month extension will allow additional time for Delta to obtain evening slots for this service that are compatible with Delta’s September 12, 2017 application for a second daily Miami-Havana frequency to complement its existing morning flight between Miami and Havana.

In support of this Motion, Delta states as follows:

1. In Order 2018-4-17, the Department awarded Delta seven frequencies to provide a second daily flight between Miami and Havana. Delta plans to inaugurate service for five of the seven Miami-Havana frequencies in October. However, despite consistent efforts to do so, Delta has been unable to obtain similar slots for two of the days of the week (Monday and Thursday). Although Delta continues to work with the slot coordinators in Havana, it is unlikely that commercially viable evening slots will become available until the start of the next IATA scheduling season.

2. Delta anticipates that it will require an additional five months, until March 31, 2019 (co-extensive with the start of the IATA summer 2019 season), in order to launch the last two weekly Miami-Havana flights. Such additional time is necessary to allow Delta to coordinate with

¹ Specifically two of seven frequencies awarded by the Department April 20, 2018. See Order 2018-4-17.

Cuban government officials and airport authorities to secure evening slot times at Havana's José Martí International Airport (HAV) that are compatible with Delta's operations and complementary to Delta's existing morning Miami-Havana flight. Delta understands that there are limited evening slots available at HAV during the upcoming winter IATA season, which runs through March 30, 2019.

3. The Department has ample authority and precedent to grant Delta the relief it seeks. Indeed, the Department has granted numerous U.S.-Havana frequency start-up extensions in the past.²

4. Delta has committed significant resources to ensuring the success of its Havana service from South Florida. Delta assures the Department that it remains committed to operating the full seven Miami-Havana frequencies allocated to it by Order 2018-4-17. The Department's grant of the relief sought herein will not impact the long-term benefits to the traveling public that Delta's second daily Miami-Havana service will provide. Granting Delta this extension to commence part of its second daily Miami-Havana service will allow Delta to better serve the traveling public with truly complementary flight timings, which is squarely in the public interest for the reasons cited by the Department in Orders 2018-4-17 and 2018-3-16.

WHEREFORE, for the reasons noted above, Delta respectfully requests that the Department grant this motion to extend the start-up condition currently placed on two of seven Miami-Havana frequencies awarded to Delta as described herein and grant such other relief as the Department may deem appropriate.

Respectfully submitted,

Alexander Krulic

Alexander Krulic
For DELTA AIR LINES, INC.

² See, e.g., Department Actions in this docket dated December 1, 2016 (Southwest), November 23, 2016 (United), November 16, 2016 (JetBlue), and November 4, 2016 (American).

CERTIFICATE OF SERVICE

A copy of the foregoing Motion has been served this 21st day of September, 2018, upon the following persons via e-mail:

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