

BEFORE THE  
DEPARTMENT OF TRANSPORTATION  
WASHINGTON, D.C.

DEPT. OF TRANSPORTATION  
DOCKET SECTION

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Application of )  
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 )  
 UNITED AIR LINES, INC. ) Docket OST-97-3271" 7  
 )  
 )  
 for a combination frequency allocation )  
 under the U.S./Brazil bilateral air )  
 services agreement of 1989, as amended )  
 )

CONSOLIDATED REPLY OF UNITED AIR LINES, INC.  
AND MOTION FOR LEAVE TO FILE

Communications with respect to this document should be sent to:

STUART I. ORAN  
Executive Vice President -  
Corporate Affairs

JOEL STEPHEN BURTON  
GINSBURG, FELDMAN and BRESS,  
CHARTERED  
1250 Connecticut Avenue, N.W.  
Suite 800  
Washington, D.C. 20036  
(202) 637-9130

CYRIL D. MURPHY  
Vice President - International  
and Regulatory Affairs

Counsel for  
UNITED AIR LINES, INC.

MICHAEL G. WHITAKER  
Director - International and  
Regulatory Affairs

UNITED AIR LINES, INC.  
P.O. Box 66100  
Chicago, Illinois 60666

SHELLEY A. LONGMUIR  
Vice President - Government  
Affairs

UNITED AIR LINES, INC.  
1025 Connecticut Avenue, N.W.  
Suite 1210  
Washington, D.C. 20036

DATED: January 14, 1998

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

Application of	)	
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UNITED AIR LINES, INC.	)	Docket OST-97-3271
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services agreement of 1989, as amended	)	

**DATED: January 14, 1998**

**CONSOLIDATED REPLY OF UNITED AIR LINES, INC.  
AND MOTION FOR LEAVE TO FILE**

United Air Lines, Inc. ("United") submits the following consolidated reply to the answers and other responsive pleadings of Continental Airlines, Inc. ("Continental"), Delta Air Lines, Inc. ("Delta"), and American Airlines, Inc. ("American") to United's application for seven (7) U.S.-Brazil frequencies:

1. The other three carriers that have requested U.S.-Brazil frequencies urge consolidation of their applications with that of United in this proceeding. United concurs for reasons stated in its motion to consolidate dated January 2, 1998.

2. Notwithstanding the recognized need to consolidate the pending frequency allocation applications, the other applicants have offered anticipatory arguments in support of their various

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<sup>1</sup> The Department normally treats applications for frequency allocations the same as applications for exemption for procedural purposes. The Department's rules permit replies as a matter of right in exemption proceedings. United requests leave to reply in this proceeding for the same reason replies are allowed in the case of exemption proceedings -- to give the

proposals. United is seeking authority to offer daily nonstop service between Los Angeles and Sao Paulo, which is the largest U.S.-Brazil market without nonstop U.S. carrier services. As illustrated in Exhibit UA-100, this city pair receives nonstop services from a number of foreign carriers. The only U.S. carrier services are limited to connections over other gateways or code shares on foreign carriers. The large Los Angeles-Sao Paulo market clearly warrants full U.S. flag carrier competition ahead of the smaller markets in which the other applicants have proposed services.

Respectfully submitted,



JOEL STEPHEN BURTON  
GINSBURG, FELDMAN and BRESS,  
**CHARTERED**  
1250 Connecticut Avenue, N.W.  
Suite 800  
Washington, D.C. 20036  
(202) 637-9130

Counsel for  
UNITED AIR LINES, INC.

**DATED: January 14, 1998**

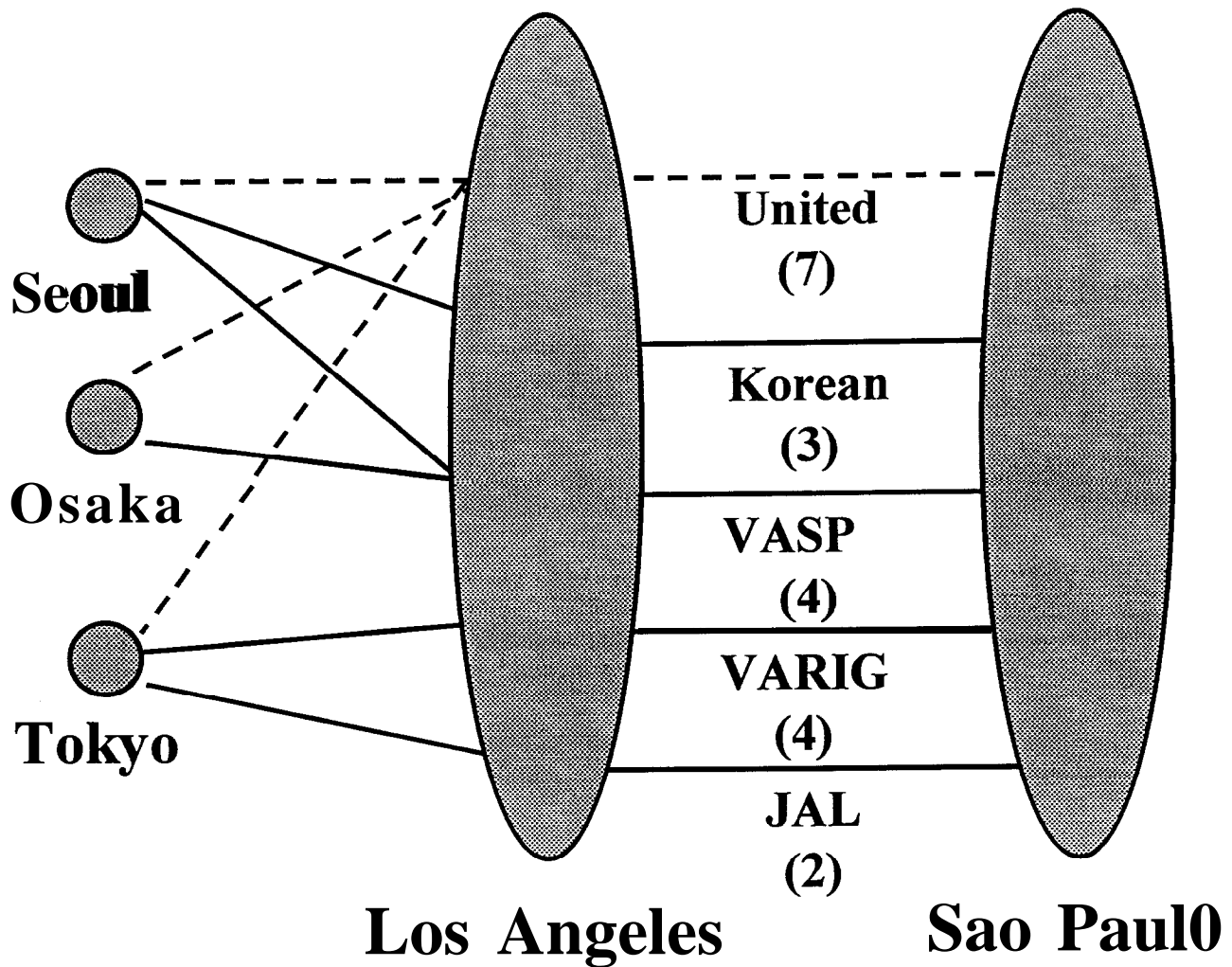
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(.. continued)

Department a more complete record upon which to reach a decision.


# United Airlines Would Provide Intra-Gateway Competition For All Of The Foreign Carriers Now Serving Los Angeles-Sao Paulo



( ) Weekly Frequencies

**CERTIFICATE OF SERVICE**

I hereby certify that I have this date served a copy of the foregoing Consolidated Reply of United Air Lines, Inc. and Motion For Leave to File on all persons named on the attached Service List by causing a copy to be sent via first-class mail, postage prepaid.

  
\_\_\_\_\_  
Brenda Gardner

**DATED: January 14, 1998**

Robert E. Cohn  
Alexander Van der Bellen  
Shaw Pittman Potts & Trowbridge  
2300 N Street, N.W.  
Washington, D.C. 20037

R. Bruce Keiner, Jr.  
Lorraine B. Halloway  
Crowell & Moring  
Suite 1000  
1001 Pennsylvania Avenue, N.W.  
Washington, D.C. 20004

Robert J. Kelly  
Acting Director  
Aviation Department  
The Port Authority of NY and NJ  
One World Trade Center  
New York, NY 10048

Carl B. Nelson, Jr.  
American Airlines, Inc.  
1101 17<sup>th</sup> Street, N.W.  
Suite 600  
Washington, D.C. 20036

Norberto Moretti  
Brazilian Embassy  
Civil Aviation Section  
3006 Massachusetts Avenue, N. W.  
Washington, D.C. 20006

Joel S. Spiro  
Deputy Assistant Secretary for  
Transportation Affairs  
Department of State  
2201 C Street, N.W.  
Room 5830  
Washington, D.C. 20520

Bret Lobner  
Los Angeles-City Attorney's Office  
Los Angeles Department of Airports  
One World Way West  
Los Angeles, CA 90045

Phil Depoian  
Deputy Executive Director  
Los Angeles Department of Airports  
One World Way West  
Los Angeles, CA 90045

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