

ORIGINAL
DEPARTMENT OF TRANSPORTATION

98 SEP -3 PM 3: 43

DOCKET SECTION

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

42399

**LOVE FIELD SERVICE
INTERPRETATION PROCEEDING**

Docket OST-98-4363-19

ANSWER OF DELTA AIR LINES, INC.

Communications with respect to this document should be addressed to:

D. Scott Yohe
Senior Vice President -
Government Affairs
DELTA AIR LINES, INC.
1275 K Street, N.W.
Washington, D . C . 20005
(202) 2 16-0700

Robert E. Cohn
Katherine M. Aldrich
SHAW PITTMAN POTTS &
TROWBRIDGE
2300 N Street, N.W.
Washington, D.C. 20037
(202) 663-8060

and

Counsel for
DELTA AIR LINES, INC.

Walter Brill
Assistant General Counsel
Rebecca Bays
Senior Attorney
DELTA AIR LINES, INC.
Law Department #986
1030 Delta Boulevard
Atlanta, Georgia 30320
(404) 7 15-4867

September 3, 1998

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

LOVE FIELD SERVICE)	
INTERPRETATION PROCEEDING)	
)	Docket OST-98-4363
)	
)	
)	
)	

ANSWER OF DELTA AIR LINES, INC.

On August 25, 1998, the Department issued Order 98-8-29 instituting the Love Field Service Interpretation Proceeding, requiring comments by September 8, 1998 and reply comments by September 15, 1998. The City of Fort Worth and Dallas-Fort Worth International Airport filed motions on September 1, 1998 requesting an extension of time (30 days) in which to file comments. On September 2, 1998, American Air Lines, Inc. also filed a motion requesting an extension of time (60 days). Southwest Airlines, Co. filed an answer on September 2, indicating that it would not object to a short (10 day) extension to the comment period. Delta Air Lines, Inc. (“Delta”) hereby files this answer supporting an extension of time of at least thirty (30) days to submit comments in response to Order 98-8-29.


Although Delta is not a party to the Texas litigation regarding Love Field, Delta is concerned that the federal law issues to be considered in this proceeding may not only impact the use of Love Field and the Dallas-Fort Worth

International Airport, but also may have far-reaching industry-wide ramifications, affecting airports and air carriers throughout the country. Delta has a significant interest in these issues and believes that the Department would benefit from Delta's views as well as the views of other industry participants.

Additional time for comments is needed. Fourteen days is not sufficient to permit Delta, which is not a party to the Love Field litigation, to familiarize itself with, and prepare meaningful comments on, the complex and controversial issues raised in the instituting order.

For these reasons, Delta supports the motions for more time and respectfully requests that the Department extend the time to submit comments until at least October 9, 1998.

Respectfully submitted,



Robert E. Cohn

Katherine M. Aldrich

SHAW, PITTMAN, POTTS & TROWBRIDGE

2300 N Street, N.W.

Washington, D. C . 20037

(202) 663-8060

Counsel for

DELTA AIR LINES, INC.

September 3, 1998

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing Answer of Delta Air Lines, Inc. was served this 3rd day of September 1998, on the following persons by fax or first class mail, postage prepaid.

Sam A. Lindsay
City Attorney
City of Dallas
1500 Marilla, Room 7BN
Dallas, TX 75201

R.H. Wallace, Jr.
Shannon, Gracey, Ratliff
& Miller, L.L.P.
500 Throckmorton Street
Suite 1600
Ft. Worth, TX 76102

John J. Corbett
Spiegel & McDiarmid
1350 New York Avenue, N. W.
Washington, D. C. 20005
Fax - (202) 393-2866

Wade Adkins
City Attorney
1000 Throckmorton Street, N.W.
Ft. Worth, TX 76102

James E. Coleman
Carrington, Coleman, Sloman &
Blumenthal
200 Crescent Court
Suite 1500
Dallas, TX 75201

Dee J. Kelly
Marshall M. Searcy, Jr.
Brian S. Stagner
Kelly, Hart & Hallman, P.C.
201 Main Street
Ft. Worth, TX 76102
Fax - (817) 878-9280

Kevin E. Cox
Deputy Executive Director
DFW International Airport
P.O. Drawer DFW
DFW Airport, TX 75261

Rebecca G. Cox
Vice President, Government Affairs
Continental Airlines, Inc.
1350 Eye Street, N.W.
Washington, D. C. 20005
Fax - (202) 289- 1546

Michael F. Goldman
Bagileo, Silverberg & Goldman, LLP
1101 30th Street, N.W.
Suite 120
Washington, D. C. 20007
Fax - (202) 944-3306

Randall W. Wilson
Susman Godfrey, L.L.P.
1000 Louisiana Street
Suite 5 100
Houston, TX 77096

E. Lawrence Vincent, Jr.
Susman Godfrey, L.L.P.
2323 Bryan Street
Suite 1400
Dallas, TX 7520 1

Robert W. Kneisley
Associate General Counsel
Southwest Airlines Company
1250 Eye Street, N.W.
Suite 1110
Washington, D. C. 20005
Fax - (202) 842-5179

T. Allan McArtor
President and CEO
Legend Airlines, Inc.
7701 Lemmon Avenue
Dallas, TX 75209


Robert E. Cohn
Shaw Pittman Potts & Trowbridge
2300 N Street, N.W.
Washington, D.C. 20037-1 128

Edward P. Faberman
Ungaretti & Harris
1747 Pennsylvania Avenue, N. W.
Suite 900
Washington, D .C. 200036
(202) 331-1486

Katherine M. Aldrich
Shaw Pittman Potts & Trowbridge
2300 N Street, N.W.
Washington, D.C. 20037-1 128

Paul C. Watler
Jenkins & Gilchrist
1445 Ross Avenue
Suite 3200
Dallas, TX 7520 1

James F. Parker
Vice President - General counsel
Southwest Airlines Company
2702 Love Field Drive
Dallas, TX 75235


Doreen S. Hughes