

DEPT. OF TRANSPORTATION
DOCKET SECTION

Docket OST-97-3271"

DATED: January 14, 1998

BEFORE THE
DEPARTMENT OF TRANSPORTATION
WASHINGTON, D.C.

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

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

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

¹ 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.

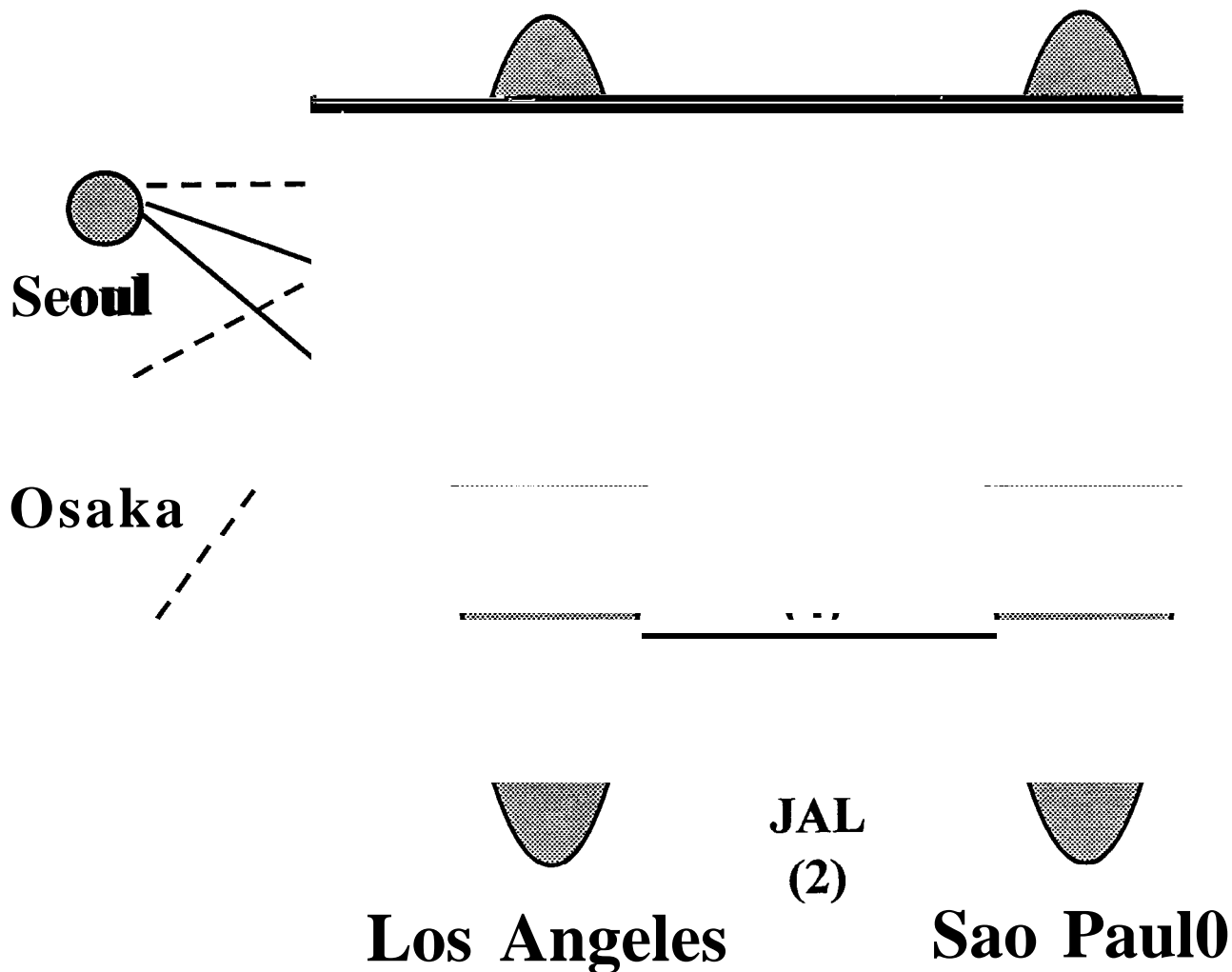
DATED: January 14, 1998

jb010\407\cons reply and mot for leave #185551

(.. continued)

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

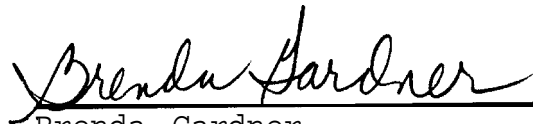
United Airlines Would Provide Intra-Gateway Competition For All Of The Foreign Carriers Now Serving Los Angeles-Sao Paulo



() 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 17th 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

jb\005\370\ua brazil serv list