BEFORE THE DEPARTMENT OF TRANSPORTATION WASHINGTON, D.C.

U.S.-TURKEY COMBINATION SERVICE THIRD-COUNTRY CODESHARING OPPORTUNITIES

Docket OST-2000-7148

CONSOLIDATED REPLY OF DELTA AIR LINES, INC.

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April 26, 2000

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Delta Air Lines, Inc. ("Delta") hereby submits this Consolidated Reply to the Answers of American, United, and Northwest regarding U.S.-Turkey third-country codeshare services. The Department should resolve this virtually uncontested case by awarding 7 frequencies each to Delta, United and Northwest for their proposed services. Each of these applicant carriers recognizes that it would be in the public interest to enable new daily Turkey third-country codeshare service by three competing alliances.

Furthermore, as acknowledged by American in its own application, and as correctly pointed out by United, Northwest and Delta in their Answers, American's proposal here is not in serious contention for an award. Rather, American has applied for Turkey third-country codeshare authority as an inappropriate device to

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argue the merits of its unrelated bid to steal Delta's duly-awarded South African codeshare designation with Air France, based on South African Airways' subsequent decision to drop American as its bilateral codeshare partner in favor of Delta. There is no merit to American's position which would violate the Department's longstanding grandfather rule with respect to existing U.S. carrier services. Here, American should be precluded from an award, based on its firm and binding agreements with Turkish Airlines to establish an extensive bilateral codeshare alliance.

WHEREFORE, Delta Air Lines, Inc., urges the Department to award Delta 7 frequencies for U.S.-Turkey third-country codeshare service.

Respectfully submitted,

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CERTIFICATE OF SERVICE

I hereby certify that I have, this 26th day of April, 2000, served the foregoing Consolidated Reply of Delta Air Lines, Inc., upon those persons listed below, by depositing copies thereof in the United States mail, first class, postage prepaid.

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