

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

U.S.-TURKEY THIRD-COUNTRY CODESHARE) Docket OST-2000-7148
OPPORTUNITIES)

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**ANSWER OF
DELTA AIR LINES, INC.**

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July 31, 2000

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U.S.-TURKEY THIRD-COUNTRY CODESHARE OPPORTUNITIES))))	Docket OST-2000-7148
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**ANSWER OF
DELTA AIR LINES, INC.**

Delta Air Lines, Inc. ("Delta") hereby answers the Comments submitted by American Airlines, Inc. ("American") in response to Order 2000-7-25 (the "Show Cause Order"). The Show Cause Order tentatively selected Delta, United and Northwest to provide third-country codeshare service to Turkey, and rejected American's proposal, based solely on the service and competitive merits of the respective proposals.

American did not file Objections to the Show Cause Order, but rather submitted "Comments." American's Comments do not challenge the tentative findings of the Show Cause Order. Instead, American's Comments argue that the Department ought to apply its rationale in this proceeding to a separate and completely unrelated matter pending in another docket. American's Comments are inappropriate and contribute nothing of substance to this proceeding.

Answer of Delta Air Lines, Inc.

Page 2

In fact, it appears that American's participation in this proceeding may have been primarily an attempt to aid American's ongoing arguments to take Delta's duly awarded and fully utilized South Africa codeshare designation -- which Delta is using today to provide beneficial third-country codeshare services to South Africa in conjunction with Air France.

The Show Cause Order correctly and firmly rejected this effort by American: "We emphasize that our decision here does not establish or reflect a policy, as suggested by American, that would preclude a carrier from holding both bilateral and third-country codeshare authority in contested limited entry markets." Id. at 4.

Delta will more fully respond in due course to the unrelated South African designation issues raised by American in Docket OST-99-6595. However, for purposes of this proceeding, no carrier has challenged the findings of the Show

Cause Order, and the Department should promptly issue a Final Order confirming its tentative decision.

Respectfully submitted,

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CERTIFICATE OF SERVICE

I hereby certify that I have, this 31st day of July, 2000, served the foregoing Answer 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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