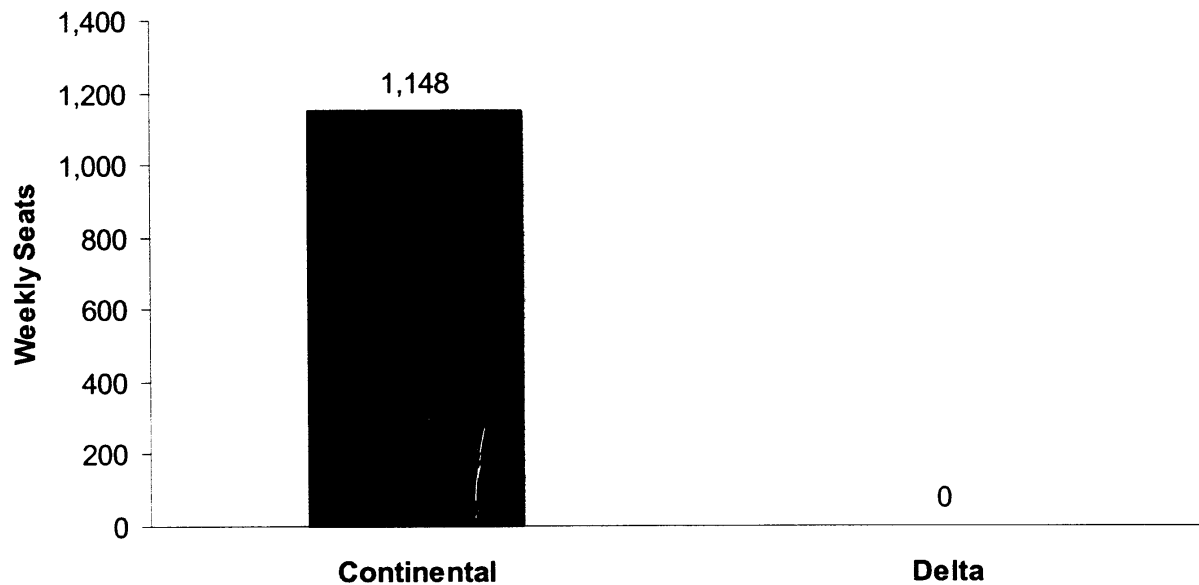


**Continental Continues To Compete Against American/Lan Chile
Between The U.S. And Chile, While Delta Has Failed To Enter This
Open-Entry Market**

Rebuttal to DL-187



U.S. - Chile Weekly Seats



Source: March 2000 OAG

Delta Already Serves Brazil From Three U.S. Gateways

Rebuttal to DL-195



U.S.
BRAZIL

<u>U.S. Gateway</u>	<u>Carrier</u>
Atlanta	Delta
Miami	Delta 1/
Orlando	Delta 1/

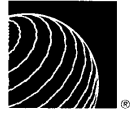
Source: March 2000 OAG
1/ Codeshare Service with Transbrasil

**Continental
Airlines**



**Continental's New York/Newark - Rio De Janeiro - Belo Horizonte
Proposal Offers Competitive Roundtrip Online Nonstop To Nonstop
Service For 55 Points While Delta's New York (JFK) - São Paulo
Proposal Offers Online Nonstop To Nonstop Service For Only 11**

Rebuttal to DL-201



U.S.
BRAZIL

**Continental Roundtrip Nonstop to Nonstop Points
Served Between New York/Newark and Rio De Janeiro**

Albany, NY	Mexico City, Mexico
Atlanta, GA	Miami, FL
Austin, TX	Milwaukee, WI
Baltimore, MD	Montreal, Canada
Boston, MA	Nashville, TN
Buffalo, NY	New Orleans, LA
Charlotte, NC	Norfolk, VA
Chicago, IL (ORD)	Orlando, FL
Cincinnati, OH	Ottawa, Canada
Cleveland, OH	Philadelphia, PA
Columbia, SC	Phoenix, AZ
Dallas/Ft. Worth, TX	Pittsburgh, PA
Dayton, OH	Portland, ME
Denver, CO	Providence, RI
Detroit, MI	Raleigh/Durham, NC
Fort Lauderdale, FL	Richmond, VA
Greensboro, NC	Rochester, NY
Greenville/Spartanburg, SC	Salt Lake City, UT
Hartford, CT	San Francisco, CA
Houston, TX (IAH)	San Juan, Puerto Rico
Indianapolis, IN	Savannah, GA
Jacksonville, FL	St. Louis, MO
Kansas City, MO	Syracuse, NY
Las Vegas, NV	Tampa, FL
London, England (LGW)	Toronto, Canada
Los Angeles, CA	Washington, DC (DCA)
Manchester, NH	Washington, DC (IAD)
	West Palm Beach, FL

Source: Exhibits CO-221

Uses 3 Hour and 30 Minute Connect Window

**Continental
Airlines**



**Continental's New York/Newark - Rio De Janeiro - Belo Horizonte
Proposal Offers Competitive Roundtrip Online Nonstop To Nonstop
Service For 55 Points While Delta's New York (JFK) - São Paulo
Proposal Offers Online Nonstop To Nonstop Service For Only 11**

Rebuttal to DL-201



U.S.
BRAZIL

**Delta Roundtrip Nonstop to Nonstop Points
Served Between New York (JFK) and Rio De Janeiro**

Atlanta, GA
Boston, MA
Baltimore, MD
Washington DC (DCA)
Fort Lauderdale, FL
Los Angeles, CA
Norfolk, VA
Portland, OR
Philadelphia, PA
Pittsburgh, PA
Salt Lake City, UT

Source: DL-206, DL-207 and March 2000 OAG

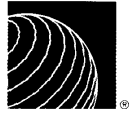
Uses 3 Hour and 30 Minute Connect Window

**Continental
Airlines**

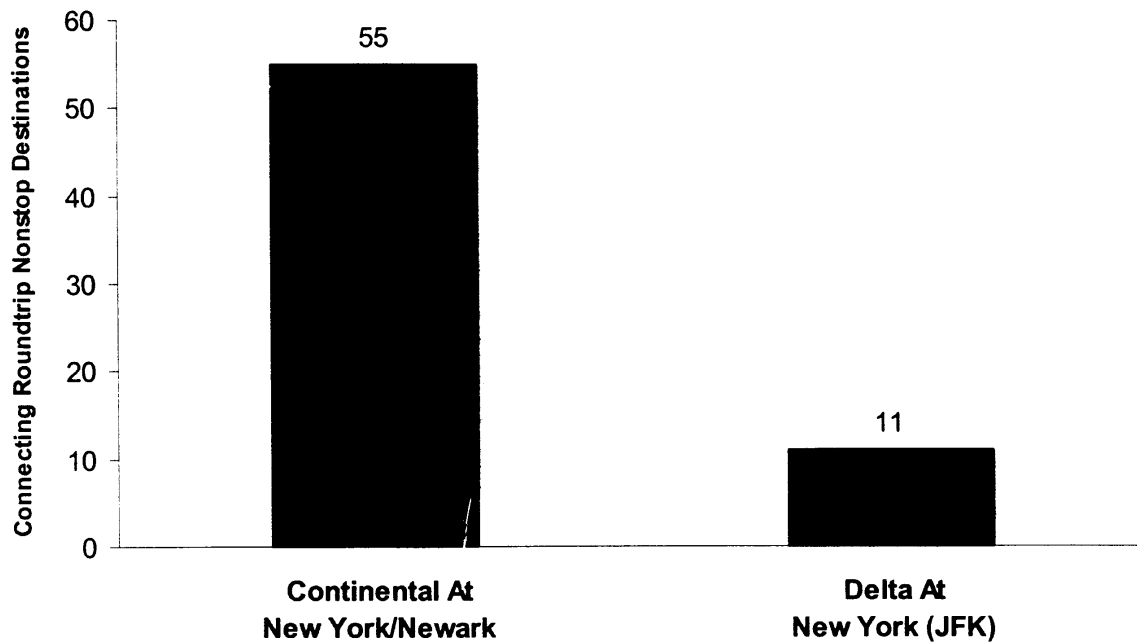


**Continental's New York/Newark - Rio De Janeiro - Belo Horizonte
Proposal Offers Competitive Roundtrip Online Nonstop To Nonstop
Service For 55 Points While Delta's New York (JFK) - São Paulo
Proposal Offers Online Nonstop To Nonstop Service For Only 11**

Rebuttal to DL-201



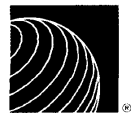
U.S.
BRAZIL



Source: CO-221, DL-206, and DL-207 and March 2000 OAG

Uses 3 Hour and 30 Minute Connect Window

**Continental
Airlines**



**Continental's Houston - São Paulo Proposal Offers Competitive
Roundtrip Online Nonstop Connecting Service For 78 Points While
Delta's New York (JFK) - São Paulo Proposal Offers Online Nonstop
Connecting Service For Only 11**

Rebuttal to DL-201



U.S.
BRAZIL

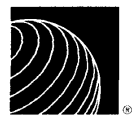
**Continental Roundtrip Nonstop To Connecting Points Served
Between São Paulo And Houston**

Albuquerque, NM	Houston, TX (EFD)	Pensacola, FL
Alexandria, LA	Houston, TX (HOU)	Philadelphia, PA
Amarillo, TX	Jackson, MS	Phoenix, AZ
Baltimore, MD	Kansas City, MO	Pittsburgh, PA
Baton Rouge, LA	Killeen, TX	Raleigh/Durham, NC
Beaumont / Port Arthur, TX	Lafayette, LA	Reno, NV
Birmingham, AL	Laredo, TX	Salt Lake City, UT
Boston, MA	Laredo, TX	San Antonio, TX
Brownsville, TX	Las Vegas, NV	San Diego, CA
Calgary, Canada	Little Rock, AR	San Francisco, CA
Cancun, Mexico	Los Angeles, CA	San Jose, CA
Charlotte, NC	Lubbock, TX	San Jose, Costa Rica
Chicago, IL (ORD)	McAllen, TX	Seattle/Tacoma, WA
Cincinnati, OH	Memphis, TN	Shreveport, LA
Cleveland, OH	Mexico City, Mexico	St. Louis, MO
College Station, TX	Miami, FL	Tampa, FL
Colorado Springs, CO	Midland, TX	Tucson, AZ
Columbus, OH	Minneapolis/St. Paul, MN	Tulsa, OK
Corpus Christi, TX	Mobile, AL	Tyler, TX
Cozumel, Mexico	Monroe, LA	Waco, TX
Dallas, TX (DAL)	Monterrey, Mexico	Washington, DC (DCA)
Dallas/Ft. Worth, TX (DFW)	Nashville, TN	
Denver, CO	New Orleans, LA	
Detroit, MI	New York, NY (LGA)	
El Paso, TX	Newark, NJ	
Fort Lauderdale, FL	Oklahoma, OK	
Greenville/Spartanburg, SC	Ontario, CA	
Gulfport, MS	Orange County, CA	
Harlingen, TX	Orlando, FL	

Source: Exhibits CO-224

Uses 3 Hour and 30 Minute Connect Window

**Continental
Airlines**



**Continental's Houston - São Paulo Proposal Offers Competitive
Roundtrip Online Nonstop Connecting Service For 78 Points While
Delta's New York (JFK) - São Paulo Proposal Offers Online Nonstop
Connecting Service For Only 11**

Rebuttal to DL-201



U.S.

BRAZIL

**Delta Roundtrip Nonstop to Connecting Points
Served Between New York (JFK) and Rio De Janeiro**

Atlanta, GA
Boston, MA
Baltimore, MD
Washington DC (DCA)
Fort Lauderdale, FL
Los Angeles, CA
Norfolk, VA
Portland, OR
Philadelphia, PA
Pittsburgh, PA
Salt Lake City, UT

Source: Exhibits DL-201, and DL-202

Uses 3 Hour and 30 Minute Connect Window

**Continental
Airlines**

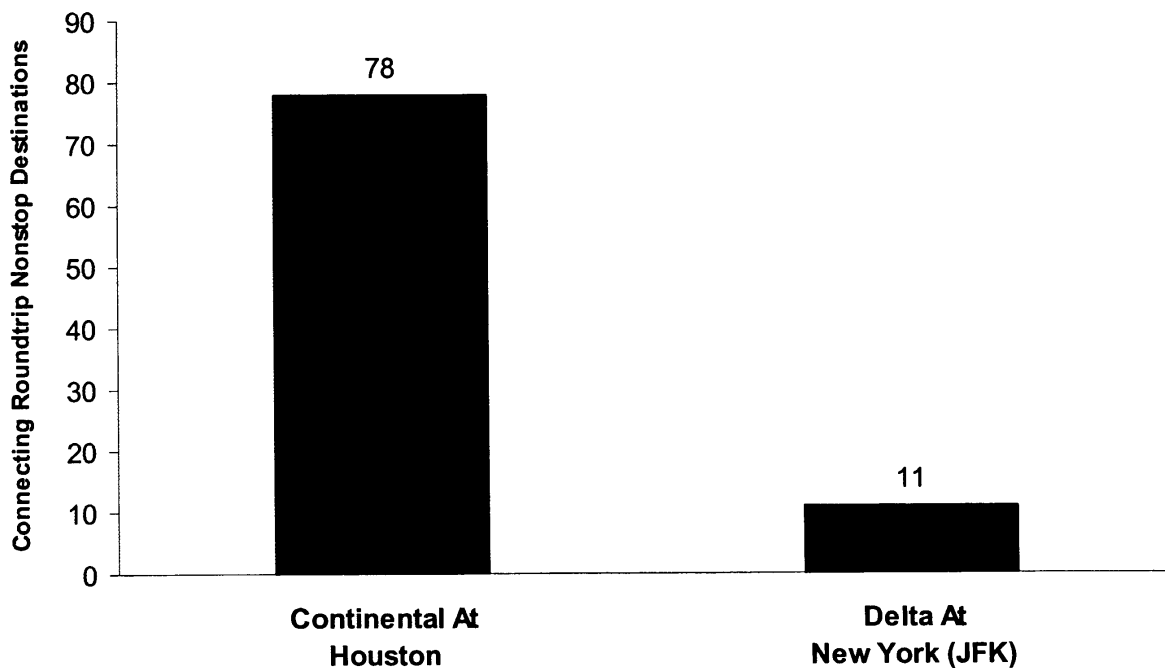


Continental's Houston - São Paulo Proposal Offers Competitive Roundtrip Online Nonstop Connecting Service For 78 Points While Delta's New York (JFK) - São Paulo Proposal Offers Online Nonstop Connecting Service For Only 11

Rebuttal to DL-201



U.S.
BRAZIL



Source: Exhibits CO-224, DL-201, and DL-202

Uses 3 Hour and 30 Minute Connect Window

**Continental
Airlines**



**The Houston - São Paulo Route Has Substantially More Passengers
Than The Atlanta - Rio De Janeiro Route**

Rebuttal to DL-311



U.S.
BRAZIL

<u>Route</u>	<u>Local Passengers</u>
Houston - São Paulo 1/	9,950
Atlanta - Rio de Janeiro 2/	7,940
Percent Houston - São Paulo Greater	25%

Source: 1/IR2ARIO.XLS

2/ IR2ASAO.XLS

**Continental
Airlines**



Continental Is Growing Its International Gateway At New York/Newark, Having Added Nonstop Service To 21 International Cities Since June 1997

Rebuttal to DL-147



U.S.
BRAZIL

<u>City</u>	<u>Start Date</u>
Birmingham, England	July 1997
São Paulo, Brazil	July 1997
Rio de Janeiro, Brazil	September 1997
Nassau, Bahamas	February 1998
Caracas, Venezuela	May 1998
Ottawa, Canada	May 1998
Dublin, Ireland 1/	June 1998
Santiago, Chile	June 1998
Shannon, Ireland 1/	June 1998
Glasgow, Scotland	July 1998
San Jose, Costa Rica	July 1998
Tokyo, Japan (NRT)	December 1998
Brussels, Belgium	May 1999
Guatemala City, Guatemala 2/	June 1999
San Salvador, El Salvador 2/	June 1999
Quebec, Canada	June 1999
Zurich, Switzerland	June 1999
Amsterdam, Netherlands	July 1999
Tel Aviv, Israel	August 1999
Cozumel, Mexico	January 2000
 Puerto Plata, Dominican Republic 3/	 June 2000

Source: Continental 1997-2000 Schedules

1/ Current Routing: Non-stop During Peak Season, EWR-DUB-SNN
during Off-peak

2/ Year-Round Service Initiated December 1999.

Current Routing: EWR - GUA - SAL - EWR

3/ Announced Future Service

Continental Airlines



Continental Is Growing Its International Gateway At Houston, Having Added Nonstop Service To 18 International Cities Since June 1997

Rebuttal to DL-147



U.S.
BRAZIL

<u>City</u>	<u>Start Date</u>
Vancouver, Canada	June 1997
Toronto, Canada	September 1997
Caracas, Venezuela	December 1997
Tampico, Mexico	April 1998
Veracruz, Mexico	April 1998
Merida, Mexico	April 1998
Aruba, Aruba	May 1998
Calgary, Canada	June 1998
Quito, Ecuador 1/	November 1998
Tokyo, Japan (NRT)	February 1999
Chihuahua, Mexico	June 1999
Saltillo, Mexico	August 1999
São Paulo, Brazil	November 1999
Torreon, Mexico	December 1999
Mazatlan, Mexico	February 2000
San Luis Potosi, Mexico	March 2000
Puebla, Mexico 2/	May 2000
Aguascalientes, Mexico 2/	June 2000

Source: Continental 1997-2000 Schedules
1/ Current Routing IAH - UIO - GYE - IAH
2/ Announced Future Service

**Continental
Airlines**



**Continental Will Provide Roundtrip Nonstop Or Online Single
Connecting Service To More Passengers In The Top 20 U.S. - São Paulo
O&D Markets Via Houston Than Delta Will Via New York (JFK)**

Rebuttal to DL-201



U.S.
BRAZIL

<u>Rank 1/</u>	<u>Top O&D Cities</u>	<u>Continental Via Houston</u>	<u>Delta Via New York (JFK)</u>
1	New York (JFK)/Newark	Yes	Yes
2	Miami, FL	Yes	No
3	Orlando, FL	Yes	No
4	Los Angeles, CA	Yes	Yes
5	Houston, TX (IAH)	Yes	No
6	Washington, DC (IAD)	Yes	Yes
7	San Francisco, CA	Yes	No
8	Chicago, IL (ORD)	Yes	No
9	Boston, MA	Yes	Yes
10	Atlanta, GA	Yes	Yes
11	Dallas/Ft. Worth, TX	Yes	No
12	Denver, CO	Yes	No
13	San Diego, CA	Yes	No
14	Las Vegas, NV	Yes	No
15	Seattle/Tacoma, WA	Yes	No
16	New Orleans, LA	Yes	No
17	Philadelphia, PA	Yes	Yes
18	Detroit, MI	Yes	No
19	Minneapolis/St. Paul, MN	Yes	No
20	Baltimore, MD	Yes	Yes

Source: Exhibits CO-224, DL-206, and DL-207
1/DOT file IR2BSAO.XLS, year ending June 1999

Uses 3 Hour and 30 Minute Connect Window

**Continental
Airlines**

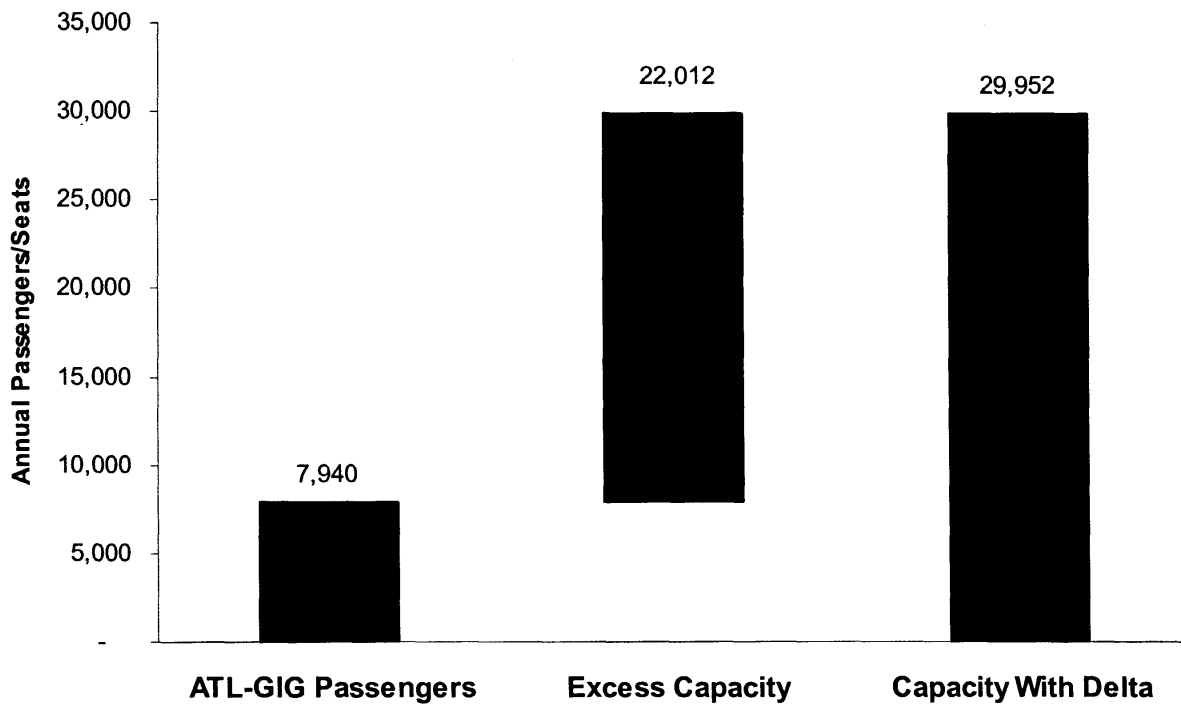


Current Nonstop Atlanta - Rio De Janeiro Capacity Would Exceed Demand By 22,012 Seats

Rebuttal to DL-152 and DL-301



U.S.
BRAZIL



**ATL-GIG
O&D passengers**

7,940

Excess Capacity

22,012

Capacity With Delta

29,952

Source: DL-321, DL-400 & March 2000 OAG

**Continental
Airlines**



Correcting For Inflated Market Shares And Overly Ambitious Stimulation Rates Reduces Delta's ATL-GIG Forecast By 8,744 Passengers

Rebuttal to DL-310 and DL-311



U.S.
BRAZIL

<u>Issue</u>	<u>Original Forecast Annual Passengers</u>	<u>Corrected Passengers</u>	<u>Difference</u>
Delta Unreasonably Stimulates it Domestic Flow Markets 1/	7,910	6,799	(1,111)
Delta Claims Too Many Passengers Where Continental Has Better Circuity 2/	3,611	328	(3,283)
Delta Claims Florida Passengers It Is Unlikely to Get 3/	6,632	820	(5,812)
Delta Forecasts Double-Connect Passengers 4/	372	0	(372)
Delta's European Connections Are Too Circuitous To Produce Traffic 5/	721	0	(721)
Local Atlanta-Rio de Janeiro Pax	6,848	6,848	0
Interline Connections 6/	464	409	(55)
Delta Markets Not Adjusted by Continental	16,359	16,359	0
Net Effect--All Corrections	42,917	31,564	(11,353)
Total Annual Seats	61,035	61,035	61,035
Load Factor	70.3%	51.7%	-18.6 pts

1/ R-1138
2/ R-1140
3/ R-1141
4/ R-1142
5/ R-1139
6/ 3% of Passengers

**Continental
Airlines**



Delta Aggressively Stimulates Many Connect Markets Behind Atlanta Which Do Not Warrant Market Stimulation

Rebuttal to DL-310 and DL-311



U.S.
BRAZIL

Delta's Original Forecast

Corrected

	YE June 99 GIG PAX Traffic	Avg. Growth Rate	Forecasted Passengers	Mkt. Stimulation	Pax After Stimulation	Delta Share	Delta Pax	Mkt. Stimulation	Delta Pax
Albuquerque, NM	240	11%	288	25%	360	24%	85	0%	68
Allentown, PA	10	11%	12	10%	13	21%	3	0%	3
Asheville, NC	20	11%	24	25%	30	36%	11	0%	9
Augusta, GA	20	11%	24	25%	30	36%	11	0%	9
Austin, TX	930	11%	1,117	10%	1,229	14%	175	0%	159
Baton Rouge, LA	90	11%	108	25%	135	36%	49	0%	39
Birmingham, AL	370	11%	445	10%	489	36%	178	0%	162
Charleston, SC	120	11%	144	10%	159	37%	58	0%	53
Charleston, WV	30	11%	36	10%	40	11%	4	0%	4
Charlotte, NC	540	11%	649	10%	714	28%	198	0%	180
Chattanooga, TN	110	11%	132	10%	145	35%	51	0%	46
Cincinnati, OH	1,580	11%	1,898	20%	2,278	30%	682	0%	570
Colorado Springs, CO	210	11%	252	10%	278	13%	36	0%	33
Columbia, SC	230	11%	276	25%	345	36%	126	0%	99
Columbus, GA	70	11%	84	25%	105	36%	38	0%	30
Columbus, OH	200	11%	240	25%	300	15%	45	0%	36
Corpus Christi, TX	6,230	11%	7,486	20%	8,983	14%	1,280	0%	1,067
Dayton, OH	200	11%	240	10%	264	19%	51	0%	46
Daytona Beach, FL	30	11%	36	25%	45	28%	13	0%	10
Des Moines, IA	40	11%	48	10%	53	11%	6	0%	5
Dothan, AL	20	11%	24	25%	30	36%	11	0%	9
El Paso, TX	270	11%	324	25%	406	24%	95	0%	78
Evansville, IN	80	11%	96	25%	120	28%	33	0%	27
Fayetteville, AR	30	11%	36	25%	45	36%	16	0%	13
Fayetteville, NC	20	11%	24	25%	30	36%	11	0%	9
Florence, SC	20	11%	24	25%	30	36%	11	0%	9
Ft. Lauderdale, FL	150	11%	180	10%	198	21%	42	0%	38
Ft. Walton Beach, FL	60	11%	72	25%	90	17%	15	0%	12
Ft. Wayne, IN	40	11%	48	10%	53	11%	6	0%	5
Gainesville, FL	40	11%	48	25%	60	28%	17	0%	13
Greensboro, NC	140	11%	168	10%	185	32%	60	0%	54
Greenville, SC	130	11%	156	25%	195	36%	71	0%	56
Harrisburg, PA	40	11%	48	10%	53	11%	6	0%	5
Honolulu, HI	1,010	11%	1,214	10%	1,335	1%	11	0%	12
Huntsville, AL	70	11%	84	25%	105	36%	38	0%	30
Indianapolis, IN	520	11%	625	10%	687	19%	129	0%	119
Jackson, MS	120	11%	144	25%	180	36%	65	0%	52
Kansas City, MO	1,170	11%	1,406	10%	1,546	16%	245	0%	225
Knoxville, TN	270	11%	324	10%	357	28%	99	0%	91
Las Vegas, NV	2,270	11%	2,728	10%	3,000	6%	192	0%	164

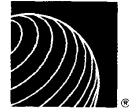
Source: DL-311

Continental
Airlines



Delta Aggressively Stimulates Many Connect Markets Behind Atlanta Which Do Not Warrant Market Stimulation

Rebuttal to DL-310 and DL-311



U.S.
BRAZIL

Delta's Original Forecast

Corrected

YE June 99	GIG PAX	Avg.	Forecasted	Mkt.	Pax After	Delta	Delta	Mkt.	Delta
	Traffic	Growth Rate	Passengers	Stimulation	Stimulation	Share	Pax	Stimulation	Pax
Lexington, KY	110	11%	132	10%	145	31%	46	0%	41
Little Rock, AR	150	11%	180	25%	225	24%	53	0%	43
Louisville, KY	170	11%	204	10%	225	48%	107	0%	98
Lynchburg, VA	30	11%	36	25%	45	28%	13	0%	10
Melbourne, FL	50	11%	60	25%	75	24%	18	0%	14
Memphis, TN	610	11%	733	10%	806	30%	241	0%	220
Milwaukee, WI	280	11%	336	10%	370	17%	63	0%	57
Minneapolis, MN	1,670	11%	2,007	10%	2,207	9%	189	0%	181
Mobile, AL	150	11%	180	10%	198	30%	59	0%	54
Monroe, LA	170	11%	204	25%	255	36%	93	0%	74
Montgomery, AL	70	11%	84	25%	105	36%	38	0%	30
Myrtle Beach, SC	110	11%	132	25%	165	36%	60	0%	48
Newburgh, NY	20	11%	24	25%	30	16%	5	0%	4
Norfolk, VA	260	11%	312	10%	344	23%	81	0%	72
Oklahoma City, OK	210	11%	252	25%	315	28%	88	0%	71
Omaha, NE	260	11%	312	10%	344	12%	40	0%	37
Ontario, CA	190	11%	228	10%	251	3%	8	0%	7
Orange County, CA	430	11%	517	10%	568	14%	82	0%	72
Panama City, FL	60	11%	72	25%	90	26%	23	0%	19
Pensacola, FL	210	11%	252	25%	315	28%	88	0%	71
Phoenix, AZ	1,190	11%	1,430	10%	1,573	16%	245	0%	229
Portland, ME	40	11%	48	10%	53	6%	3	0%	3
Portland, OR	940	11%	1,129	25%	1,412	21%	302	0%	237
Richmond, VA	640	11%	769	10%	846	24%	199	0%	185
Roanoke, VA	100	11%	120	10%	132	24%	31	0%	29
Sacramento, CA	480	11%	577	10%	634	4%	29	0%	23
Salt Lake City, UT	1,220	11%	1,466	20%	1,759	28%	490	0%	410
San Antonio, TX	560	11%	673	10%	740	12%	89	0%	81
Sarasota, FL	170	11%	204	10%	225	21%	48	0%	43
Savannah, GA	50	11%	60	10%	66	36%	24	0%	22
Shreveport, LA	90	11%	108	25%	135	30%	40	0%	32
St. Louis, MO	1,030	11%	1,238	10%	1,361	21%	279	0%	260
St. Thomas, VI	100	11%	120	10%	132	2%	3	0%	2
Tallahassee, FL	40	11%	48	25%	60	30%	18	0%	14
Toledo, OH	80	11%	96	25%	120	34%	41	0%	33
Tri Cities	30	11%	36	10%	40	32%	13	0%	12
Tulsa, OK	690	11%	829	25%	1,036	19%	199	0%	158
Valdosta, GA	70	11%	84	25%	105	36%	38	0%	30
West Palm Beach, FL	230	11%	276	10%	304	21%	65	0%	58
Wichita, KS	190	11%	228	10%	251	17%	41	0%	39
Wilmington, NC	70	11%	84	25%	105	36%	38	0%	30
Total	30,960						7,910		6,799

Passenger Total Reduced By: 1,111

Source: DL-311

Continental Airlines



Delta Forecasts 721 Passenger For Their New York (JFK) Service Through European Connecting Markets Which Are Too Circuitous To Produce Traffic

Rebuttal to DL-310 and DL-311



U.S.

BRAZIL

Delta's Original Forecast

Corrected

YE June 99

GIG PAX

Traffic

Avg.

Growth Rate

Forecasted

Passengers

Mkt.

Stimulation

Pax After

Stimulation

Delta

Share

Delta

Pax

Mkt.

Stimulation

Delta

Pax

International Connections:

Amsterdam, Netherlands							49		0
Barcelona, Spain							20		0
Brussels, Belgium							19		0
Berlin, Germany							2		0
Frankfurt, Germany							92		0
London, England							79		0
Madrid, Spain							125		0
Montreal, Canada							9		0
Munich, Germany							21		0
Paris, France							153		0
Rome, Italy							73		0
Tokyo, Japan							13		0
Toronto, Canada							15		0
Switzerland							51		0
Total							721		0

Passenger Total Reduced By: 721

Source: DL-311

Continental Airlines



Delta Claims More Rio De Janeiro Passengers Via Atlanta Than Continental Forecasts For Its Less Circuitous New York/Newark Route

Rebuttal to DL-310 and DL-311



U.S.
BRAZIL

Delta Original Forecast

	<u>Year End 6/30/99 O&D</u>	<u>Average Annual Growth 1/</u>	<u>Year End 9/30/01 O&D</u>	<u>Circuitry via ATL</u>	<u>DL Market Share</u>	<u>Year End 9/30/01 DL Pax</u>
Washington, D.C.	13,660	11.0%	16,413	7%	22%	3,611

Continental Forecast

	<u>Year End 6/30/99 O&D</u>	<u>Average Annual Growth 2/</u>	<u>Year End 9/30/01 O&D</u>	<u>Circuitry via EWR</u>	<u>CO Market Share</u>	<u>Year End 9/30/01 CO Pax</u>
Washington, D.C.	13,660	13.7%	17,120	5%	2%	342

Delta's Market Shares Conservatively Revised To Match Continental's

	<u>Year End 6/30/99 O&D</u>	<u>Average Annual Growth 2/</u>	<u>Year End 9/30/01 O&D</u>	<u>Circuitry via ATL</u>	<u>DL Market Share</u>	<u>Year End 9/30/01 DL Pax</u>
Washington, D.C.	13,660	11.0%	16,413	7%	2%	328

Passenger Total Reduced By: 3,283

Source: DL-310 and CO-311

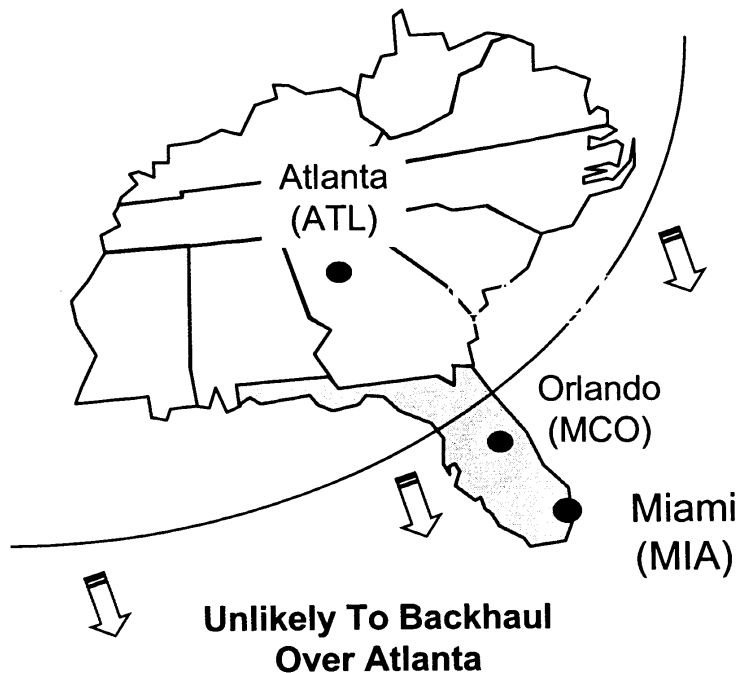
**Continental
Airlines** 

Delta Forecasts 6,632 Annual Rio De Janeiro Passengers From Florida Over Atlanta Even Though It Represents A Significant Backhaul And Miami Has Significant Nonstop Service

Rebuttal to DL-310 and DL-311



U.S.
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**MIA-GIG
Weekly Departures**

American	7
Varig	6
United	7

Delta's Original Forecast

Corrected

	<u>YE 9/30/01 GIG Passengers After Growth</u>	<u>Delta's Share</u>	<u>YE 9/30/01 Delta Passengers</u>	<u>Delta's Share</u>	<u>YE 9/30/01 Delta Passengers</u>
Miami	78,919	1.1%	843	0.0%	0
Orlando	37,333	14.3%	5,320	2.0%	747
Other FLA Markets	1,886	24.9%	469	15.7%	74
Total			6,632		820

Passenger Total Reduced By:

5,812

Source: DL-311, March 2000 OAG

**Continental
Airlines**



Delta Forecasts 372 Double-Connect Passengers To Rio De Janeiro While Continental Does Not Include Any Double-Connect Traffic In Its Proposals

Rebuttal to DL-311



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	Delta's Original Forecast						Corrected Forecast		
	YE June 99								
	GRU PAX	Avg.	Forecasted	Mkt.	Pax After	Delta	Delta	Delta	
	Traffic	Growth Rate	Passengers	Stimulation	Stimulation	Share	Pax	Share	Pax
Lafayette, LA	380	11%	456	0%	456	17%	78	0%	0
Tucson, AZ	390	11%	468	0%	468	9%	40	0%	0
Reno, NV	200	11%	240	0%	240	16%	38	0%	0
Spokane, WA	130	11%	156	0%	156	18%	28	0%	0
Boise, ID	130	11%	156	0%	156	13%	20	0%	0
Charlottesville, VA	70	11%	84	0%	84	24%	20	0%	0
Bangor, ME	80	11%	96	0%	96	19%	18	0%	0
Ft. Smith, AR	40	11%	48	0%	48	30%	14	0%	0
Fayetteville, AR	30	11%	36	0%	36	36%	13	0%	0
Lansing, MI	110	11%	132	0%	132	8%	11	0%	0
Bozeman, MT	40	11%	48	0%	48	21%	10	0%	0
Oakland, CA	110	11%	132	0%	132	6%	8	0%	0
Cedar Rapids, ID	160	11%	192	0%	192	4%	8	0%	0
Kalamazoo, MI	90	11%	108	0%	108	7%	8	0%	0
Casper, WY	70	11%	84	0%	84	9%	8	0%	0
South Bend, IN	60	11%	72	0%	72	10%	7	0%	0
Killeen, TX	110	11%	132	0%	132	5%	7	0%	0
Madison, WI	120	11%	144	0%	144	4%	6	0%	0
Missoula, MT	20	11%	24	0%	24	21%	5	0%	0
Akron, OH	30	11%	36	0%	36	13%	5	0%	0
Anchorage, AK	40	11%	48	0%	48	9%	4	0%	0
Fresno, CA	80	11%	96	0%	96	4%	4	0%	0
Palm Springs, CA	80	11%	96	0%	96	4%	4	0%	0
Jackson Hole, WY	10	11%	12	0%	12	21%	3	0%	0
Billings, MT	10	11%	12	0%	12	16%	2	0%	0
Idaho Falls, ID	10	11%	12	0%	12	13%	2	0%	0
Appleton, WI	30	11%	36	0%	36	4%	1	0%	0
Rapid City, IA	20	11%	24	0%	24	6%	1	0%	0
Key West, FL	30	11%	36	0%	36	2%	1	0%	0
Total							372		0
Passenger Total Reduced By:							372		

Source: DL-311, March 2000 OAG

Continental Airlines



**Correcting For Inflated Market Shares And Overly Ambitious
Stimulation Rates Reduces Delta's New York (JFK) - São Paulo
Forecast By 15,881 Passengers**

Rebuttal to DL-301 and DL-302



U.S.
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<u>Issue</u>	<u>Original Forecast Annual Passengers</u>	<u>Corrected Passengers</u>	<u>Difference</u>
Delta Unreasonably Stimulates The New York Local Market 1/	75,143	65,342	(9,801)
Delta's European Connections Are Too Circuitous To Produce Traffic 2/	2,525	0	(2,525)
Montevideo Traffic 3/	19,657	19,657	0
Connecting Rio De Janeiro Traffic 3/	3,185	0	(3,185)
Interline Connections 4/	2,330	1,960	(370)
Beyond GRU Traffic 3/	3,905	3,905	0
Net Effect--All Corrections	106,745	90,864	(15,881)
Total Annual Seats	143,562	143,562	143,562
Load Factor	74.4%	63.3%	-11.1 pts

1/ R-1145

2/ R-1146/

3/ DL-304

4/ 3% of Online Traffic

**Continental
Airlines**



Delta Stimulates New York by 15% Which Is Unreasonable Considering The Level Of Existing Service

Rebuttal to DL-301 and DL-302



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Delta's Original Forecast

Corrected

	YE June 99 GRU PAX Traffic	Avg. Growth Rate	Forecasted Passengers	Mkt. Stimulation	Pax After Stimulation	Delta Share	Delta Pax	Mkt. Stimulation	Delta Pax
Between São Paulo and:									
New York	284,291	13%	352,570	15%	405,455	19%	75,143	0%	65,342
Passenger Total Reduced By:									9,801
Albany, NY	530	13%	657	0%	657	15%	99	0%	99
Baltimore, MD	2,100	13%	2,604	0%	2,604	12%	313	0%	313
Boston, MA	20,490	13%	25,411	0%	25,411	2%	635	0%	635
Chicago, IL	45,120	13%	55,955	0%	55,955	1%	560	0%	560
Cincinnati, OH	2,990	13%	3,708	0%	3,708	11%	408	0%	408
Dallas/Ft. Worth	25,670	13%	31,835	0%	31,835	0%	0	0%	0
Denver, CO	8,180	13%	10,144	0%	10,144	4%	406	0%	406
Detroit, MI	14,310	13%	17,746	0%	17,746	3%	444	0%	444
Fort, CT	1,080	13%	1,339	0%	1,339	5%	67	0%	67
Frank, VA	510	13%	632	0%	632	15%	95	0%	95
Philadelphia, PA	6,150	13%	7,627	0%	7,627	4%	305	0%	305
Pittsburgh, PA	2,520	13%	3,125	0%	3,125	11%	344	0%	344
Portland, OR	3,350	13%	4,154	0%	4,154	8%	332	0%	332
Rochester, NY	1,750	13%	2,170	0%	2,170	5%	109	0%	109
Washington DC	15,220	13%	18,875	0%	18,875	5%	901	0%	901
							5,016		5,016
Passenger Total Reduced By:									-

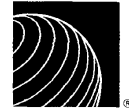
Source: DL-302

**Continental
Airlines**



Delta Forecasts 2,525 Passengers For Its New York (JFK) Service Through European Connection Markets Which Are Too Circuitous To Produce Traffic

Rebuttal to DL-301 and DL-302



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	Delta's Original Forecast	Corrected
	Delta Pax	Delta Pax
<u>International Single Connections:</u>		
Amsterdam, Netherlands	179	0
Athens, Greece	47	0
Barcelona, Spain	152	0
Brussels, Belgium	131	0
Budapest, Hungary	13	0
Dublin, Ireland	9	0
Frankfurt, Germany	254	0
Istanbul, Turkey	7	0
Lisbon, Portugal	351	0
Madrid, Spain	328	0
Manchester, England	20	0
Milan, Italy	331	0
Moscow, Russia	9	0
Munich, Germany	80	0
Nice, France	27	0
Paris, France	265	0
Rome, Italy	193	0
Shannon, Ireland	9	0
Stockholm, Sweden	50	0
Stuttgart, Germany	70	0
Total	2,525	0
	Passenger Total Reduced By:	2,525

Source: DL-302

Continental Airlines



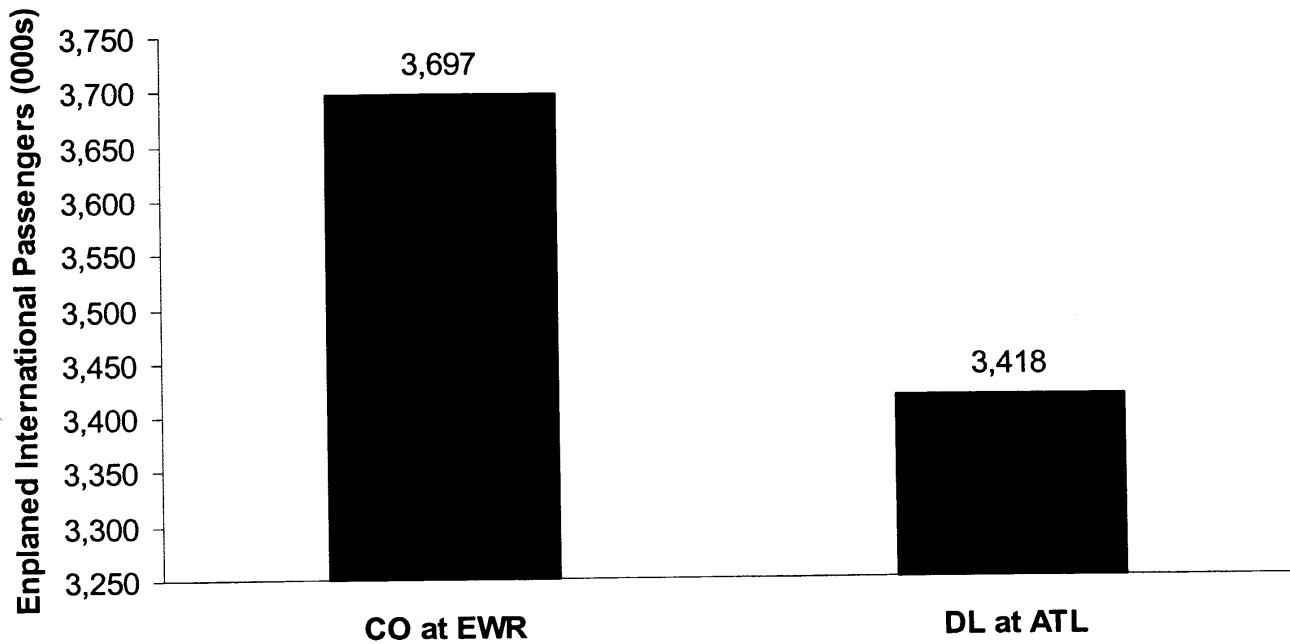
Continental At New York/Newark Handles More International Passengers Than Delta At Atlanta

Rebuttal to ATL-207



U.S.
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Total International Passengers



Source: DOT T-100 Data, Onboard International 98/07 - 99/06

**Continental
Airlines**



Delta Has Abandoned 45 International Routes Since 1992

Rebuttal to DL-T-1



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Route	Year Route Abandoned
Portland - Fukuoka	1999
Portland - Seoul	1999
Los Angeles - Seoul	1998
Frankfurt - Athens	1997
Frankfurt - Bucharest	1997
Frankfurt - Istanbul	1997
Los Angeles - Frankfurt	1997
Orlando - Frankfurt	1997
Frankfurt - Warsaw	1997
Washington D.C. (IAD) - Frankfurt	1997
Frankfurt - Moscow	1997
San Francisco - Frankfurt	1997
Los Angeles - Acapulco	1997
Los Angeles - Mazatlan	1997
Los Angeles - Puerto Vallarta	1997
Frankfurt - Budapest	1996
Frankfurt - St. Petersburg	1996
Atlanta - Hamburg	1995
Dallas/Fort Worth - Frankfurt	1995
Detroit - London (LGW)	1995
Seoul - Taipei	1995
Taipei - Bangkok	1995
Frankfurt - Delhi	1995
Frankfurt - Prague	1995
Frankfurt - Vienna	1995
Los Angeles - Hong Kong	1995
New York (JFK) - Helsinki	1995
New York (JFK) - Lisbon	1995
Portland - Taipei	1995

Route	Year Route Abandoned
Cincinnati - Munich	1994
Dallas/Fort Worth - Mexico City	1994
Frankfurt - London (LGW)	1994
Los Angeles - Ixtapa	1994
Miami - London (LGW)	1994
New York (JFK) - Oslo	1994
New York (JFK) - Stockholm	1994
New York (JFK) - Vienna	1994
Atlanta - Nice	1993
Frankfurt - Miami	1993
New York (JFK) - Budapest	1993
New York (JFK) - Hamburg	1993
New York (JFK) - Zurich	1993
Orlando - Paris (ORY)	1993
Dallas/Fort Worth - Acapulco	1992
Newark - Frankfurt	1992

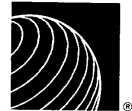
Source: Official Airline Guide

Continental Airlines



**Delta Has Completely Abandoned Limited Entry Asian
Frequencies Awarded By The Department**

Rebuttal to DL-T-1



U.S.
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**Delta Abandoned Several
Limited-Entry Asian Routes In 1995**

<u>Route</u>	<u>Last Month Served</u>
Seoul - Taipei	April 1995
Taipei - Bangkok	November 1995
Frankfurt - Delhi	November 1995
Los Angeles - Hong Kong	November 1995
Portland - Taipei	November 1995

Note: Seoul, South Korea and Taipei, Taiwan Are Now Open - Skies
Source: Official Airline Guide

**Continental
Airlines**



Delta Has Completely Abandoned Limited Entry Asian Frequencies Awarded By The Department

Rebuttal to DL-T-1



U.S.
BRAZIL

In January 1999 Delta Dropped Its Long-Time Portland - Seoul, Korea Service

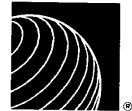
<u>Month</u>	<u>Origin</u>	<u>Destination</u>	<u>Aircraft</u>	<u>Depart</u>	<u>Arrive</u>	<u>Frequency</u>
↓	↓	↓	↓	↓	↓	↓
9801	PDX	SEL	M11	1250	1655	1234567
9802	PDX	SEL	M11	1250	1655	1234567
9803	PDX	SEL	M11	1250	1655	1234567
9804	PDX	SEL	M11	1250	1545	1234567
9805	PDX	SEL	M11	1250	1545	1234567
9806	PDX	SEL	M11	1250	1545	1234567
9807	PDX	SEL	M11	1250	1545	1234567
9808	PDX	SEL	M11	1250	1545	1234567
9809	PDX	SEL	M11	1250	1545	1234567
9810	PDX	SEL	M11	1250	1545	1234567
9811	PDX	SEL	M11	1250	1655	1234567
9812	PDX	SEL	M11	1250	1655	1234567
9901	PDX	SEL	M11	1250	1655	1234567
-	-	-	-	-	-	-
-	-	-	-	-	-	-
-	-	-	-	-	-	-

Source: Official Airline Guide

**Continental
Airlines** 

Delta Has Completely Abandoned Limited Entry Asian Frequencies Awarded By The Department

Rebuttal to DL-T-1



U.S.
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Delta Abandoned Its Portland - Fukuoka Route Authority After Less Than A Year Of Service

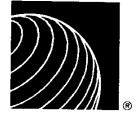
9808	-	-	-	-	-	-	-
9809	-	-	-	-	-	-	-
9810	-	-	-	-	-	-	-
9811	Portland	Fukuoka, Japan	M11	248	12:55	17:20	1234567
9812	Portland	Fukuoka, Japan	M11	248	12:55	17:20	1234567
9901	Portland	Fukuoka, Japan	M11	248	12:55	17:20	1234567
9902	Portland	Fukuoka, Japan	M11	248	12:55	17:20	1234567
9903	Portland	Fukuoka, Japan	M11	248	12:55	17:20	1234567
9904	Portland	Fukuoka, Japan	M11	248	12:50	16:00	1234567
9905	Portland	Fukuoka, Japan	M11	248	12:50	16:00	1234567
9906	Portland	Fukuoka, Japan	M11	248	12:50	16:00	1234567
9907	Portland	Fukuoka, Japan	M11	248	12:50	16:00	1234567
9908	Portland	Fukuoka, Japan	M11	248	12:50	16:00	1234567
9909	Portland	Fukuoka, Japan	M11	248	12:50	16:00	1234567
9910	-	-	-	-	-	-	-
9911	-	-	-	-	-	-	-
9912	-	-	-	-	-	-	-

Source: Official Airline Guide

**Continental
Airlines** 

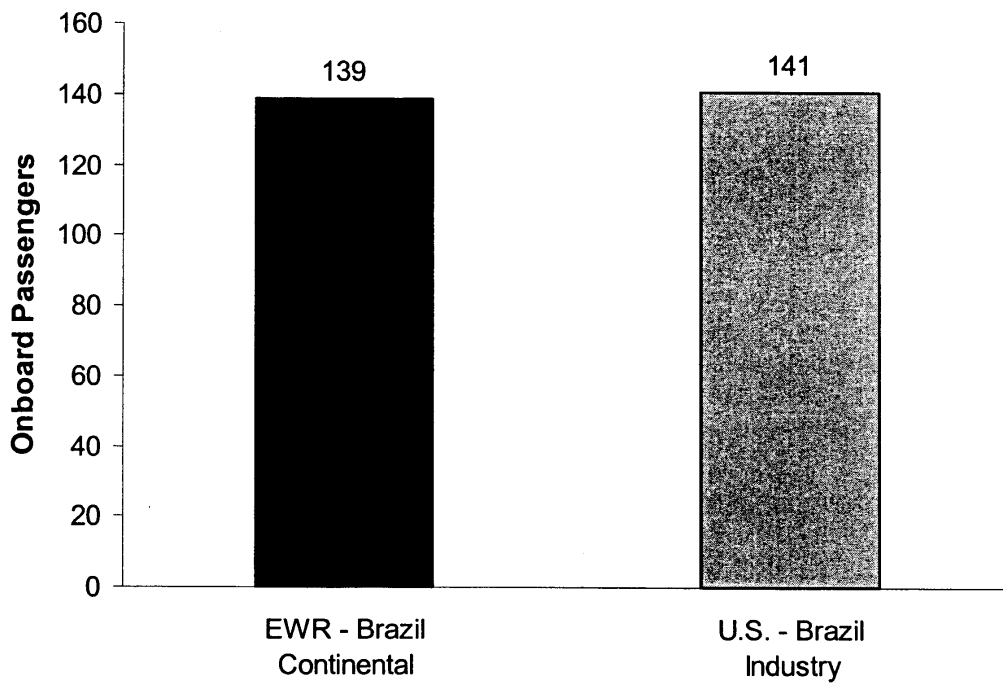
**Continental's New York/Newark - Brazil Flights Perform Very Near
The Industry Average In Onboard Passengers Per Departure**

Rebuttal to DL-177



U.S.
BRAZIL

Onboard Passengers Per Departure



Source: DOT T-100 Data YE June 1999, U.S. and Latin American Carrier Scheduled Service

**Continental
Airlines**

