BEFORE THE
U.S. DEPARTMENT OF TRANSPORTATION
WASHINGTON, D.C.

APPLICATION OF AMERICAN AIRLINES, INC.
FOR RENEWAL OF EXEMPTION AUTHORITIES

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DATED: March 23, 2021
BEFORE THE
U.S. DEPARTMENT OF TRANSPORTATION
WASHINGTON, D.C.

APPLICATION OF AMERICAN AIRLINES, INC.
FOR RENEWAL OF EXEMPTION AUTHORITIES

Pursuant to 49 U.S.C. § 40109 and Subpart C of the Department of Transportation’s (“Department”) Rules of Practice (14 C.F.R. Part 302), American Airlines, Inc. (“American”) applies for renewal of exemptions authorizing it to conduct scheduled foreign air transportation of persons, property, and mail between the United States and various points as described in Attachment A hereto. Renewing these authorities so that they are aligned in terms of the two-year duration will diminish the significant administrative burden, for both the Department and American, that is associated with numerous individual renewals. American thus requests that all
of the exemption authorities set forth in Attachment A be renewed for the same period of time with the same expiration date.¹

In support of this renewal application, American respectfully states as follows:

1. American is a Delaware corporation with its principal office at 1 Skyview Drive, Fort Worth, Texas 76155.

2. American is a citizen of the United States within the meaning of 49 U.S.C. § 40102(a)(15)(C) and is fit, willing, and able to provide the services contemplated by this application. American holds various certificates of public convenience and exemption authorities. (See, e.g., DOT Order 2007-4-2, April 3, 2007, Dockets OST-2000-8516 and OST-2005-22228 (Blanket Open-Skies Route Authority); Notice of Action Taken, October 7, 2014, Docket DOT-OST-2014-0169 (Dallas/Ft. Worth – Beijing).) Pursuant to Rule 24 of the Department’s Rules of Practice, American requests that the Department take official notice of all information previously filed to establish its fitness.

3. American holds exemptions authorizing it to conduct scheduled foreign air transportation of persons, property and mail between points in the United States and various foreign points as set forth in Attachment A.

4. All of the services at issue in Attachment A are authorized by an air transport agreement between the United States and the applicable foreign government.

5. American requests that the Department renew its exemptions for a period of at least two years, which is consistent with Department precedent.

¹ Through this application, American amends and respectfully renews its original application dated June 21, 2017, in Docket No. DOT-OST-2017-0087, and related dockets, for renewal of its exemption authorities in effect at that time.
6. Pursuant to 14 C.F.R. § 377.10, American intends to rely on the Administrative Procedures Act, 5 U.S.C. § 558 (c) implemented by Part 377, to the extent necessary to continue in effect its current exemption authorities pending a final determination on this renewal application.²

7. American will accept the terms, limitations and conditions that the Department routinely attaches to exemption authority to engage in foreign air transportation.

WHEREFORE, American respectfully requests that the Department renew for a two-year period its exemption authorities to engage in scheduled foreign air transportation of persons, property, and mail between the United States and various points as discussed herein and as set forth in Attachment A, and grant such additional relief as the Department deems appropriate.

Respectfully submitted,

Robert A. Wirick  
Managing Director  
International Government Affairs

John B. Williams  
Senior Analyst  
International Government Affairs

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john.b.williams@aa.com

March 23, 2021

² Where applicable, American respectfully requests a waiver of the 60-day advance filing requirement of the automatic continuance provisions of Part 377 of the Department’s rules so that its authorities may remain in effect pending Department action, as provided in 5 U.S.C. section 558(c). To the extent necessary, American also requests a reissuance to align dates and such.
CERTIFICATE OF SERVICE

I certify that, on March 23, 2021, I caused to be served a copy of the foregoing Application of American Airlines, Inc. for Renewal of Exemption Authorities, by email upon those addressees listed below:

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kristen.gatlin@dot.gov (Department of Transportation)
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G. Brent Connor

4852-2366-6393.4
Scheduled foreign air transportation of persons, property, and mail between the coterminous points
New York, New York, and Miami, Florida, and the coterminous points
Johannesburg and Cape Town, South Africa, formerly for codesharing on
South African Airways, but amendment sought (and pending) to replace South African Airways with British Airways.

<table>
<thead>
<tr>
<th>Description</th>
<th>U.S. Point</th>
<th>Foreign Point</th>
<th>Foreign Country</th>
<th>Notes</th>
<th>Order/NOAT</th>
<th>Expiration Date</th>
<th>Docket No.</th>
</tr>
</thead>
<tbody>
<tr>
<td>Scheduled foreign air transportation of persons, property, and mail between the coterminous points New York, New York, and Miami, Florida, and the coterminous points Johannesburg and Cape Town, South Africa, formerly for codesharing on South African Airways, but amendment sought (and pending) to replace South African Airways with British Airways.</td>
<td>New York and Miami</td>
<td>Johannesburg and Cape Town (via London pursuant to amendment sought)</td>
<td>South Africa</td>
<td>Codesharing with South African Airways, but renewal application also sought an amendment to replace South African Airways with British Airways</td>
<td>NOAT March 31, 1998¹</td>
<td>Pending Application²</td>
<td>DOT-OST-1998-3401</td>
</tr>
</tbody>
</table>

¹ Order No. 98-6-2.
² On January 27, 2000, American filed an application for renewal and amendment of the exemption. American requested that the Department renew and amend American’s U.S. – South Africa exemption authority to permit AA to codeshare with British Airways for flights operated by British Airways via London to South Africa. This application remains pending as of February 1, 2021.
Application of American for Renewal of Exemption Authorities

<table>
<thead>
<tr>
<th>Scheduled foreign air transportation of persons, property, and mail between points in the United States, on the one hand, and Anguilla, Saba, St. Eustatius, and St. Barthelemy, on the other pursuant to a codesharing arrangement with Windward Islands Airways International, N.V.</th>
<th>U.S. points</th>
<th>Anguilla and St. Barthelemy (Saba and St. Eustatius now covered by Blanket Open Skies Route Authority)</th>
<th>Caribbean points</th>
<th>Codesharing with Windward Islands Airways International, N.V.</th>
<th>NOAT December 16, 2002</th>
<th>Pending Application</th>
<th>DOT-OST-2002-13705</th>
</tr>
</thead>
<tbody>
<tr>
<td>Scheduled foreign air transportation of persons, property, and mail between a point or points in the United States and a point or points in the British Virgin Islands pursuant to a</td>
<td>British Virgin Islands</td>
<td>British Virgin Islands</td>
<td>Codesharing with Caribbean Sun Airlines</td>
<td>NOAT June 18, 2003</td>
<td>Pending Application</td>
<td>DOT-OST-2003-15254</td>
<td></td>
</tr>
</tbody>
</table>

3 While American’s renewal application was pending, the United States entered into an open skies agreement with the Royal Kingdom of the Netherlands covering certain points in the Caribbean, including Saba and St. Eustatius. See Air Transport Agreement Between The United States Of America And The Kingdom Of The Netherlands, In Respect Of The Caribbean Part of the Netherlands, Relating To Air Transport Between The Caribbean Part Of The Netherlands And The United States Of America. Consequently, exemption authority is no longer required for Saba and St. Eustatius since those points are now covered under American’s Blanket Open Skies Route Authority. See DOT Order 2007-4-2, April 3, 2007, Dockets DOT-OST-2000-8516 and DOT-OST-2005-22228.


<table>
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<tbody>
<tr>
<td>codeshare arrangement with Caribbean Sun Airlines.</td>
</tr>
<tr>
<td>Scheduled foreign air transportation of persons, property,</td>
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<tr>
<td>and mail between Orlando, Florida, and Hamilton, Bermuda.</td>
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<tr>
<td>Orlando, Florida</td>
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<tr>
<td>Scheduled foreign air transportation of persons, property,</td>
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<tr>
<td>and mail between a point or points in the United States and</td>
</tr>
<tr>
<td>Antigua, and beyond Antigua.</td>
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<tr>
<td>U.S. points</td>
</tr>
<tr>
<td>Scheduled foreign air transportation of persons, property,</td>
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<tr>
<td>and mail between a point or points in the United States, on</td>
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<tr>
<td>the one hand, and a point or points in</td>
</tr>
<tr>
<td>U.S. points</td>
</tr>
</tbody>
</table>


<sup>7</sup> Renewal application filed on February 19, 2008, in Docket No. DOT-OST-2001-9932. Pending as of February 1, 2021. This authority was originally held by U.S. Airways, and was transferred to American with Order No. 2014-11-13 in Docket No. DOT-OST-2013-0082 (Nov. 19, 2014).

<table>
<thead>
<tr>
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<tr>
<td><strong>Hong Kong, on the other hand.</strong></td>
</tr>
<tr>
<td>Scheduled foreign air transportation of persons, property, and mail between Dallas/Ft. Worth, Texas and Shanghai, People’s Republic of China.</td>
</tr>
<tr>
<td>Dallas/Ft. Worth, Texas</td>
</tr>
<tr>
<td>Scheduled foreign air transportation of persons, property, and mail between Dallas/Ft. Worth, Texas and Beijing, People’s Republic of China.</td>
</tr>
<tr>
<td>Scheduled foreign air transportation of persons, property, and mail between Seattle and Beijing and to any point in China on a codeshare basis with Hainan Airlines (Hainan), as authorized by the</td>
</tr>
<tr>
<td>Seattle</td>
</tr>
</tbody>
</table>

<sup>8</sup> The Department noted that “US Airways states that it currently offers code share service in this market.” Docket No. DOT-OST-2003-14303 (Aug. 20, 2007)

<sup>10</sup> Renewal application filed on May 9, 2016, in Docket No. DOT-OST-2013-0187. Pending as of February 1, 2021.

<sup>11</sup> Renewal application filed on July 29, 2016, in Docket No. DOT-OST-2014-0169. Pending as of February 1, 2021

| Scheduled foreign air transportation of persons, property, and mail between Miami, Florida, and Santa Cruz and La Paz, Bolivia. | Miami, Florida | Santa Cruz and La Paz, Bolivia | NOAT August 21, 2015 | Pending Application¹³ | DOT-OST-1997-2302 |
| Scheduled foreign air transportation of persons, property, and mail between the United States and Vietnam.¹⁴ | U.S. points | Vietnam points | Vietnam | NOAT November 17, 2016 | Pending Application¹⁵ | DOT-OST-2002-12496 |
| Scheduled foreign air transportation of persons, property, and mail between any points in the United States and (i) 4 points in Argentina and beyond points in South America, (ii) 5 | U.S. points | Argentina points | Argentina | Codesharing with LAN Argentina | NOAT November 17, 2016 | Pending Application¹⁸ | DOT-OST-2007-0034 |

¹⁴ American uses this authority to display the AA* code on flights operated by Japan Airlines International Co., Ltd.
<table>
<thead>
<tr>
<th>Application of American for Renewal of Exemption Authorities</th>
</tr>
</thead>
<tbody>
<tr>
<td>additional points in Argentina on a codeshare basis only, and (iii) 5 additional points in Argentina on a codeshare basis only, in conjunction with a designated airline of Argentina.</td>
</tr>
<tr>
<td>Scheduled foreign air transportation of persons, property, and mail between the United States, on the one hand, and Fiji, Kiribati (Christmas Island), Vanuatu, and the Solomon Islands, on the other hand.</td>
</tr>
<tr>
<td>U.S. points</td>
</tr>
<tr>
<td>Scheduled foreign air transportation of persons, property and mail between the United States and Bariloche,</td>
</tr>
<tr>
<td>U.S. points</td>
</tr>
</tbody>
</table>

16 American operates these services pursuant to a codeshare arrangement with Lan Argentina.

17 Id.

19 American uses this authority to display the AA* code on flights operated by Air Argentina.


<table>
<thead>
<tr>
<th>Application of American for Renewal of Exemption Authorities</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Cordoba, Mendoza, and Rosario, Argentina, via Santiago, Chile, for codesharing with LAN</strong></td>
</tr>
<tr>
<td>Scheduled foreign air transportation of persons, property and mail between points within Ecuador, on a codeshare-only basis, on LAN Ecuador flights.</td>
</tr>
<tr>
<td><strong>Ecuador points</strong></td>
</tr>
<tr>
<td><strong>Los Angeles, California</strong></td>
</tr>
<tr>
<td><strong>Miami, Florida</strong></td>
</tr>
</tbody>
</table>


**Application of American for Renewal of Exemption Authorities**

<table>
<thead>
<tr>
<th>Scheduled foreign air transportation of persons, property, and mail between Miami, Florida, and Havana, Cuba.(^{25})</th>
<th>Miami, Florida</th>
<th>Havana</th>
<th>Cuba</th>
<th>NOAT July 25, 2018</th>
<th>Pending Application(^{26})</th>
<th>DOT-OST-2016-0021</th>
</tr>
</thead>
<tbody>
<tr>
<td>Scheduled foreign air transportation of persons, property, and mail between points in the United States and points in the People’s Republic of China, and between points within China, on a codeshare basis with China Southern Airlines Company Limited (China Southern).</td>
<td>U.S. points</td>
<td>China points</td>
<td>China</td>
<td>Codesharing with China Southern</td>
<td>NOAT December 20, 2018</td>
<td>Pending Application(^{27})</td>
</tr>
<tr>
<td>Scheduled foreign air transportation of persons, property, and mail between points in the United States, and points worldwide on a codeshare basis with China Southern Airlines Company Limited (China Southern).</td>
<td>U.S. points</td>
<td>Points worldwide</td>
<td>Blanket codesharing</td>
<td>Codesharing</td>
<td>NOAT March 18, 2020</td>
<td>March 18, 2022(^{28})</td>
</tr>
</tbody>
</table>

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\(^{25}\) Per DOT’s notice dated October 25, 2019, authorization for service between U.S. and Cuba, except José Martí International Airport (HAV) in Havana, are suspended.

\(^{26}\) Renewal application filed on May 1, 2020, in Docket No. DOT-OST-2016-002. Pending as of February 1, 2021.


\(^{28}\) The most recent application for an amendment was filed on March 17, 2020. Pending as of February 1, 2021.
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| third-country codeshare basis pursuant to blanket codesharing statements of authorization. | Seattle, Washington | Shanghai | China | NOAT August 5, 2020 | August 5, 2022 | DOT-OST-2010-0245 |
| Scheduled foreign air transportation of persons, property, and mail between Seattle, Washington, and Shanghai, People’s Republic of China. | | | | | | |