



May 6, 2020

BY EMAIL

Ms. Lauralyn J. Remo
Chief, Air Carrier Fitness Division
Office of Aviation Analysis
U.S. Department of Transportation
1200 New Jersey Ave. S.E.
Washington, D.C. 20590

Re: Eastern Airlines Certificate Activation - Scheduled
Interstate Air Transportation (Docket OST-2014-0071)

Dear Ms. Remo,

Eastern Airlines LLC respectfully requests that its scheduled interstate certificate be activated to enable it to provide non-stop combination flights between New York, NY (JFK) and San Diego, CA (SAN).¹ In addition to its interstate scheduled certificate, Eastern currently holds certificate authority for scheduled foreign air transportation and interstate and foreign charter air transportation.

Eastern plans to begin domestic scheduled service between New York JFK and San Diego in approximately 30 days. In addition to the information submitted with this letter, in support of this request Eastern relies on the documents and information submitted in previous applications for authority.

Eastern is a privately-owned low-cost carrier with an experienced management team. The airline is well financed and there has been no change in ownership since Eastern's last information submission to the Department.

Prior to its start of scheduled international service at the beginning of 2020, Eastern launched a new website with a strong customer-company interface, and has staff for handling customer issues and responding quickly to customer needs. Eastern began service to Guayaquil, Ecuador from JFK on January 12, 2020 with

¹ Eastern was previously issued scheduled interstate authority by Order 2015-10-15 (Oct. 23, 2015), authority which was reissued in the name of Eastern Airlines, LLC by Order 2018-10-9 (Oct. 5, 2018). This authority needs to be reactivated pursuant to Order 2017-1-3 (Jan. 3, 2017).

one weekly flight and, due to strong customer demand added a second flight on February 5.

Due to closure of the airport as a result of COVID-19, Eastern suspended this service on March 15, but plans to return as conditions permit. Similarly, Eastern planned a March 5 start of service to Georgetown, Guyana, after a lengthy delay caused by the Government of Guyana in violation of the bilateral agreement. However, this service was also postponed because of the virus. As with Guayaquil, Eastern will start Georgetown service as soon as health/safety conditions permit.

It bears emphasis that in response to the COVID-19 crisis, by May 6, 2020 Eastern will have operated 65 US citizen repatriation flights bringing home over 12,000 passengers from over 14 different countries without cost to the U.S. government. In this successful operation, Eastern worked closely with the State Department, the Department of Transportation and US embassies and their host countries throughout the Western Hemisphere. In addition, Eastern has repatriated approximately 2,000 foreign citizens back to their homes from the U.S. *See Exhibit J.*

Eastern has Department authority to operate up to ten (10) aircraft and may operate three (3) aircraft in scheduled foreign air transportation.² Eastern currently operates a fleet of eight (8) wholly owned B767 widebody aircraft. At this time, Eastern respectfully requests the Department remove the limit on aircraft Eastern may operate including for scheduled interstate and foreign air transportation. Eastern believes it has demonstrated its ability to operate an expanded fleet and needs flexibility to develop its interstate service. Eastern believes the FAA will not have any objection to this request.³

In making this request, Eastern notes it is certified as a member of the Civil Reserve Air Fleet program, which requires a “white glove” safety audit by the Department of Defense.⁴

Eastern offers the following additional, updated information in support of its request:

² See January 31, 2020 letter from Lauralyn Remo.

³ Eastern is currently working with FAA to obtain its over water Extended Twin Operations (ETOPS) certification.

⁴ See <https://www.amc.af.mil/About-Us/Fact-Sheets/Display/Article/144025/civil-reserve-air-fleet/>.

1. Eastern is a limited liability company with its principal place of business at 550 E. Swedesford Road, Suite #210, Wayne PA 19087, tel. (336) 790-7533.
2. Eastern 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. Pursuant to 14 C.F.R. § 204.3, Eastern requests the Department take official notice of all information previously filed to establish its fitness.⁵
3. Eastern has employed Jyri Strandman as its Eastern Vice President of Flight Operations. *See* Exhibit A. Mr. Strandman is a citizen of the United States. *Id.*, including letter dated Jan. 27, 2020, confirming Mr. Strandman meets the requirements of 14 C.F.R. Parts 119.65 and 119.67. Eastern has not undergone any other substantial changes in management or ownership.
4. Eastern holds a certificate authorizing scheduled international combination service between the U.S. and Guyana.⁶ Eastern also holds exemption authority to operate: between the U.S. and Mexico⁷; between the U.S. and Ecuador⁸; and between the U.S. and any Open Skies country⁹. There have been no material changes within the Company that would affect those prior fitness findings.
5. Eastern's balance sheets, income statements and cash flow statements for the previous three months, attached as Exhibit B. Notes to these financial statements are attached as Exhibit C.
6. Eastern plans to initiate service between JFK and SAN beginning on or about June 1, 2020. Eastern will operate on the following initial schedule:

⁵ § 204.3 provides "If the applicant has previously formally filed any of the required data with the Department or with another Federal agency and they are available to the Department, and those data continue to reflect the current state of the carrier's fitness, the applicant may instead identify the data and provide a citation for the date(s) and place(s) of filing." Eastern relies on data it submitted with its March 16, 2018 Information Response and April 2, 2018 Application for Reissuance of Certificates in dockets DOT-OST-2014-0069 and DOT-OST-2014-0071 and asks the Department to take notice of the data.

⁶ *See* Order 2019-5-6, Docket DOT-OST-2014-0071 (May 6, 2019).

⁷ *See* Notice of Action Taken, Jan. 10, 2020, Docket DOT-OST-2019-0174.

⁸ *See* Notice of Action Taken, May 28, 2019, Docket DOT-OST-2019-0029.

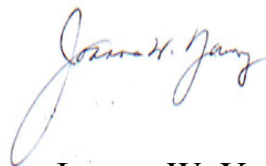
⁹ *See* Notice of Action Taken, March 3, 2020, Docket DOT-OST-2019-0185.

From	To	Dep. Time	Arr. Time	Flight #	Equip.	Freq.	Stops
JFK	SAN	2300	0150+1 LCL	432	B767	W/Fr/Su	0
SAN	JFK	0630	1510 LCL	431	B767	W/Fr/Su	0

7. Eastern's financial fitness is summarized in Exhibit E. A forecast income statement for the first year of the proposed service is attached as Exhibit F, and notes to this statement are attached as Exhibit G. A forecast balance sheet for the first year of the proposed service is attached as Exhibit H, and notes are attached as Exhibit I.
8. Awarding this authority is in the public interest as it will provide new low-fare non-stop service between New York City and San Diego on wide-body aircraft. Eastern is the only U.S. low fare scheduled carrier to operate long-haul widebody aircraft.
9. Eastern expects no difficulty obtaining fuel for the proposed service from regular suppliers. Annual fuel consumption will not exceed the 10-million-gallon threshold specified in section 313.4(a)(1) of the Department's regulations.

Eastern would like to begin preparations for its JFK-SAN service as soon as possible. Accordingly, a timely review and decision would be greatly appreciated.

Sincerely,



Joanne W. Young
David M. Kirstein

Counsel for Eastern Airlines, LLC

cc: Docket OST-2014-0071
Mr. Todd Homan
Mr. Damon Walker