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

Joint Application of	)	
DELTA AIR LINES, INC.	)	
and	)	
AEROVIAS DE MEXICO, S.A. DE C.V.	)	**Docket DOT-OST-2015-0070**
Under 49 U.S.C. §§ 41308 and 41309 for Approval of and Antitrust Immunity for Commercial Alliance Agreement	)	

JOINT COMMENT OF ALLEGIANT AIR AND VIVA AEROBUS
IN RESPONSE TO ORDER 2025-07-12

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August 11, 2025

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Allegiant Air, LLC (Allegiant) and **Aeroenlaces Nacionales, S.A. de C.V. d/b/a Viva Aerobus** (Viva) submit the following comment in response to the Department of Transportation's (DOT or Department) Supplemental Order to Show Cause (Order 2025-7-12) (Order or OSC) issued July 19, 2025 tentatively terminating antitrust immunity (ATI) for the alliance between Delta Air Lines, Inc. (Delta) and Aerovias de Mexico, S.A. de C.V. (Aeromexico).

Allegiant and Viva offer the following principal observations concerning Order 2025-7-12:

- The Order properly emphasizes that every ATI application should be assessed on its specific facts and that the effectiveness of the Open Skies relationship is an important element in assessing both the public benefits of a proposed joint venture and its competitive impacts.

- The alleged failings identified by DOT in both the public benefits test and the competitive assessment of the Delta/Aeromexico alliance would not be found in a similar analysis of the proposed Allegiant/Viva alliance. To the contrary, the benefits of capacity expansion and new route launches that will lower fares – which DOT found lacking in the Delta/Aeromexico alliance – are the central feature of the Allegiant/Viva alliance.
- As previously stated in this docket, a continued suspension of the Allegiant/Viva docket while Delta/Aeromexico continues to operate with antitrust immunity is patently unfair and continues to insulate legacy carriers from the significant competition that the Allegiant/Viva alliance would bring to transborder routes.[1]
- The ongoing delay in engaging in a fact specific assessment of the Allegiant/Viva alliance – longer than any other ATI application processed by the DOT – is not only unfair[2] and anticompetitive, but also costly. Continued delay in the Allegiant/Viva docket has cost U.S. consumers in excess of $150 million in annual monopoly rents paid to the largest legacy carriers and has denied millions of Americans the opportunity to travel internationally.
- The Order encourages Delta and Aeromexico to "continue traditional commercial cooperation" including code sharing and joint marketing without the benefit of

[1] Joint Objection of Allegiant Air and Viva Aerobus to Order to Show Cause, Ex. A, at 3-11, Docket DOT-OST-2015-0070-0259 (Feb. 23, 2024). In a recent ex parte communication, "Delta stated that the Department should delay finalizing any decision on ATI, allowing time for negotiations in response to DOT's Part 213 action to play out." Memorandum from Cindy Baraban, Deputy Assistant Sec'y, DOT, to Dockets Manager (Aug. 5, 2025).

[2] "Most gallingly, while this application has been pending, Delta has been able to add around 25 routes to Mexico through its joint venture with Aeroméxico. The Allegiant-Viva alliance would charge 46% lower fares on these same routes, but it has been precluded from entering them." *See* Renewed Joint Motion of Allegiant Air and Viva Aerobus to Expeditiously Reinstitute Procedural Schedule and Grant Antitrust Immunity, at 4, Docket DOT-OST-2021-0152-0207 (Apr. 4, 2025).

ATI.[3] Other carriers in the market, including Allegiant and Viva, should be expeditiously afforded the same opportunity should they seek to pursue a code share and commercial cooperation.

- DOT maintains that the Order is not being used as a diplomatic tool to pressure the Government of Mexico to come into compliance with the U.S.-Mexico Air Transport Agreement ("Agreement") and asserts that it seeks not to exacerbate the unreasonable capacity constraints it has identified at Benito Juárez International Airport (MEX).[4] For that reason, Allegiant and Viva encourage the Department to engage promptly in the type of individualized assessment of their joint venture as it did in the Order with regard to Delta/Aeromexico and not simply allow their application to languish. Allegiant and Viva are confident that their alliance would satisfy the factual tests DOT applied in the Order.
- To the extent DOT believes that there are prerequisites to engaging in an assessment of the Allegiant/Viva alliance (such as a transparent slot allocation process at MEX), Allegiant and Viva encourage DOT to address those items expeditiously. The U.S.-Mexico market is the United States' most important international air travel market yet suffers from inadequate competition on a significant number of routes that do not touch MEX, adversely affecting vast numbers of U.S. travelers seeking to travel to leisure destinations in Mexico.
- Allegiant and Viva submit that the Department's failure to address the fundamental lack of meaningful competition in leisure markets by delaying

[3] Supplemental Order to Show Cause, Order 2025-07-12, at 3, Docket DOT-OST-2015-0070-0333 (July 19, 2025).
[4] *Id.* at 29. ("This argument is based on an incorrect premise that the Department is taking this action to assert leverage to bring Mexico into compliance with the Agreement. That is not the case.").

approval of their alliance is far costlier to Americans than the restrictions that the Government of Mexico has imposed at MEX.

I. Completion of the Statutory Analysis for the Allegiant/Viva Alliance Would Have a Different Result than for Delta/Aeromexico.

Allegiant and Viva in large part agree with the analytical framework the Department set forth in the Order regarding how the existence of Open Skies factors into its ATI analysis. As articulated in their prior submissions,[5] Allegiant and Viva agree that the Open Skies assessment is "firmly grounded" in "U.S. competition law" and that Open Skies is assessed to "determine the extent to which it enables market forces such as new entry, competitive pricing, and a fair and equal opportunity to compete."[6] These elements are important to ensure that ATI is granted only in circumstances where "a minimally pro-competitive environment exists to adequately discipline" the joint venture.[7] Allegiant and Viva reserve observations on the particular analysis of the nine-year-old Delta-Aeromexico alliance until the parties have had the opportunity to respond. However, to the extent the Order is read implicitly to suggest that the dispute with the Government of Mexico necessitates the same result for the Allegiant/Viva alliance, it would be a misapplication of the fact-based analysis at the core of the Order. As the Order clearly states, "[a]ddressing ATI matters necessarily requires a case-by case analysis of facts and circumstances."[8] Such an analysis of the Allegiant/Viva joint venture would demonstrate beyond question that the statutory requirements are met for a grant of ATI.

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[5] *See* Joint Objection of Allegiant Air and Viva Aerobus to Order to Show Cause, Ex. A at 12-15.
[6] Order 2025-07-12 at 16-17.
[7] *Id.* at 17.
[8] *Id.* at 28; *see also* Comments of the Department of Justice at 12-13, Docket DOT-OST-2015-0070-0342 (Aug. 8, 2025) (agreeing with the Department's fact-based analysis of the Delta-Aeromexico alliance, where "far from reflecting an extra-statutory condition, DOT's consideration of an effective 'Open Skies' agreement regulatory framework as part of its evaluation of antitrust immunity is consistent with the robust competitive effects analysis required under DOT's operative statute.").

The Allegiant/Viva alliance advances the goals of Open Skies, "enabl[ing] open entry and new competition in the market."[9] The U.S.-Mexico market is the largest international air market for the United States, both by seat volume and by O&D traffic. The Agreement has been highly successful in expanding the transborder market: the total number of cross-border O&D pairs has grown by 11%, the number of flights by 31%, the number of seats by 75%, and the number of passengers by 76%. Meanwhile the average fare has fallen by 16% in nominal terms and 36% in inflation adjusted terms.[10] This year alone, 33 new routes and 5,054 additional flights on new and existing routes have been announced.[11] The problem in the transborder market as a whole is not slot allocation or flight restrictions, but rather that the market is currently dominated by legacy carriers charging high fares, that are protected from effective value airline competition.[12]

The following three graphics show the volume of passengers, market share and average fares for 1) the U.S.-Mexico market in total, 2) the U.S. to Mexican beach markets, and 3) U.S. small and mid-sized cities to Mexican beach markets. The data, methodologies and dynamic interfaces for these graphs, as well as the others in this Joint Comment (plus additional metrics related to this and the Allegiant/Viva docket), are available at https://www.mexicanbeaches4all.com/.

What the three graphs demonstrate is:

- The U.S.-Mexico market remains dominated by legacy carriers charging higher fares.

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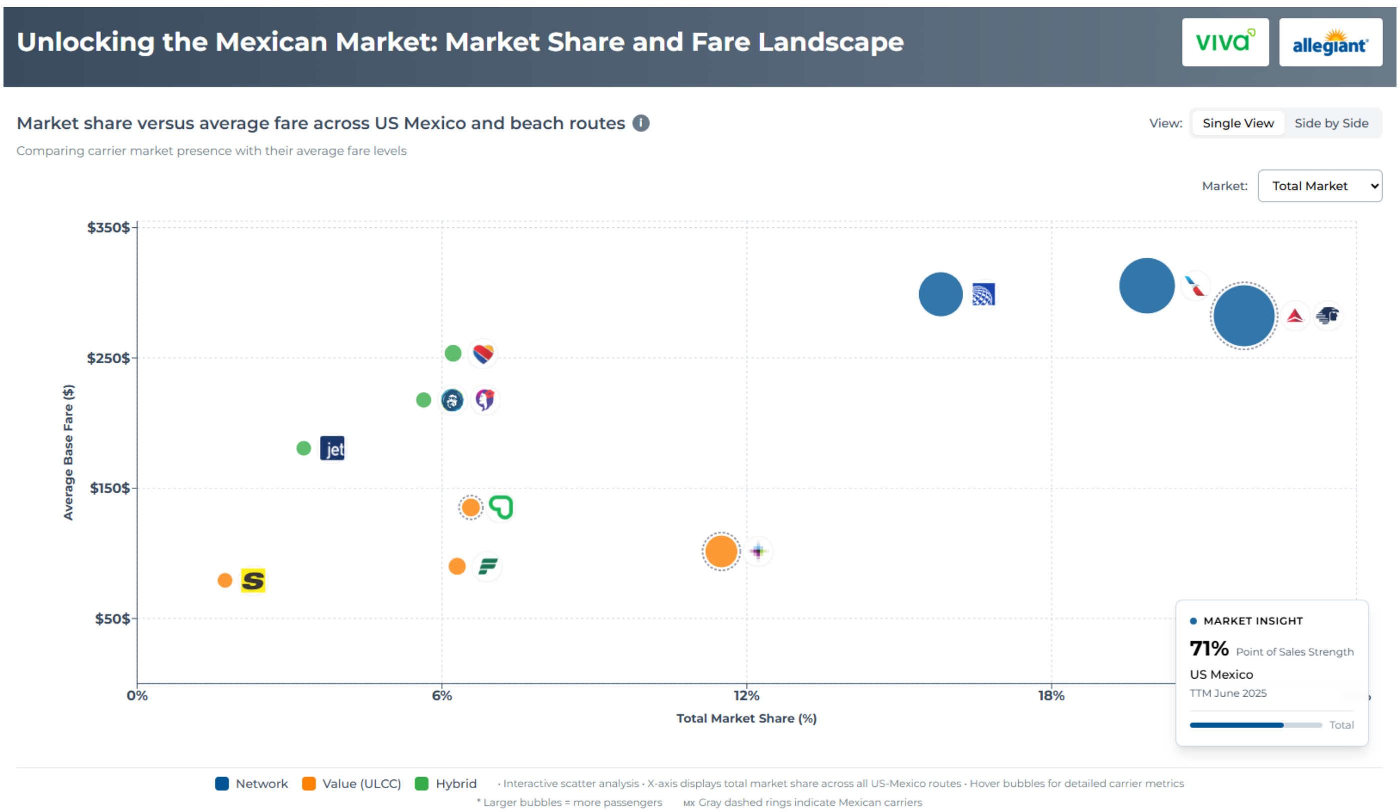
[9] Order 2025-07-12 at 26.
[10] Joint Objection of Allegiant Air and Viva Aerobus to Order to Show Cause, Ex. A at 18.
[11] Airline Schedules, Cirium Aviation Analytics.
[12] Joint Objection of Allegiant Air and Viva Aerobus to Order to Show Cause, Ex. A at 7-8 ("Currently the transborder market is dominated by legacy carriers, with a 60% share of transborder traffic, and who charge roughly 121% higher fares than ULCCs. In the market for transborder travel to beach destinations in Mexico, legacy carriers capture 57% of the transborder traffic and charged roughly 137% higher fares.").

- The leisure market for U.S. consumers to Mexican beach destinations is even more concentrated with even less competition from low-fare value airlines[13] and with prices higher than the market in total.
- The competitive situation is even worse for traffic from small and mid-sized cities in the United States where the fares are still higher, the concentration higher and the availability of value options even lower. Worse yet, the higher priced product is an inferior product: 64% percent of small and mid-sized cities have no direct flight options. The availability of direct flights is sparse or nonexistent.

<u>Table 1</u>



[13] Value airlines have sometimes been referred to as low-cost carriers (LCC) or ultra-low-cost carriers (ULCC).

Table 2

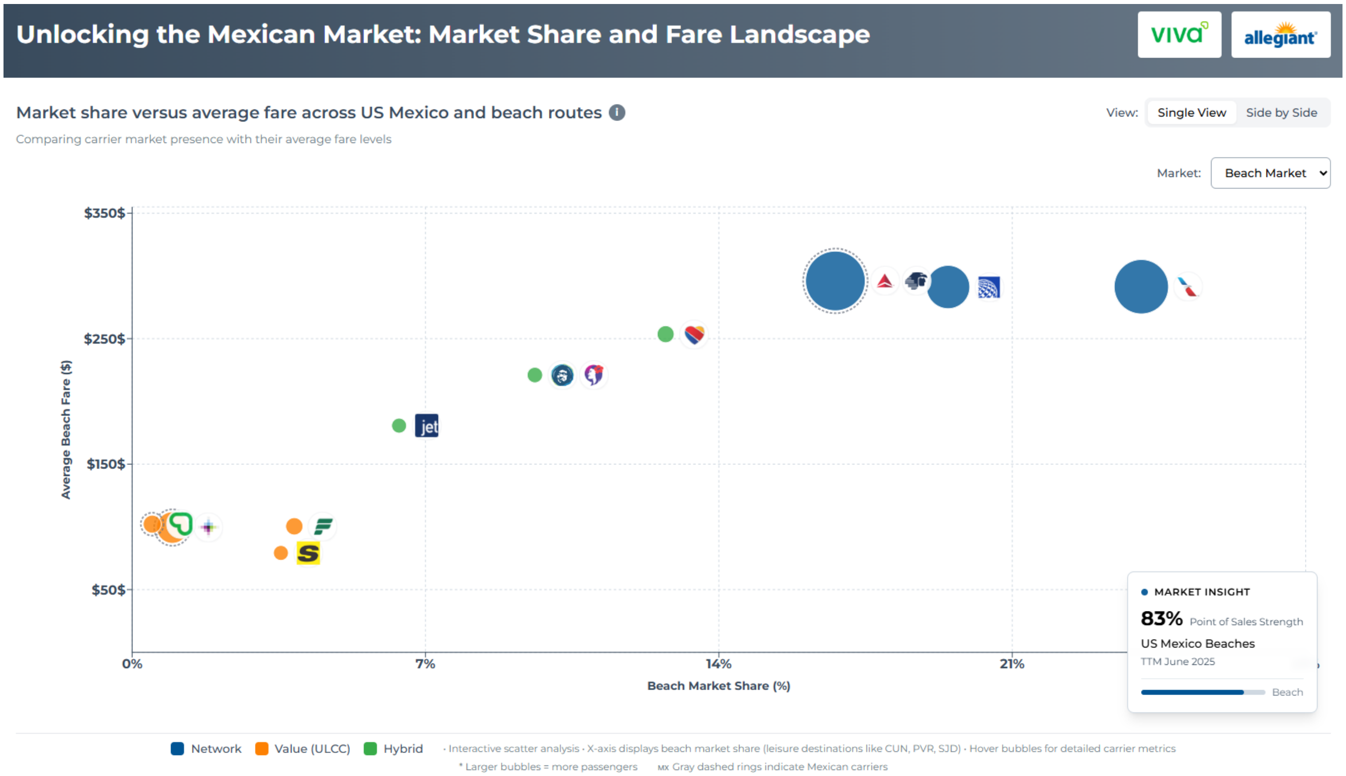
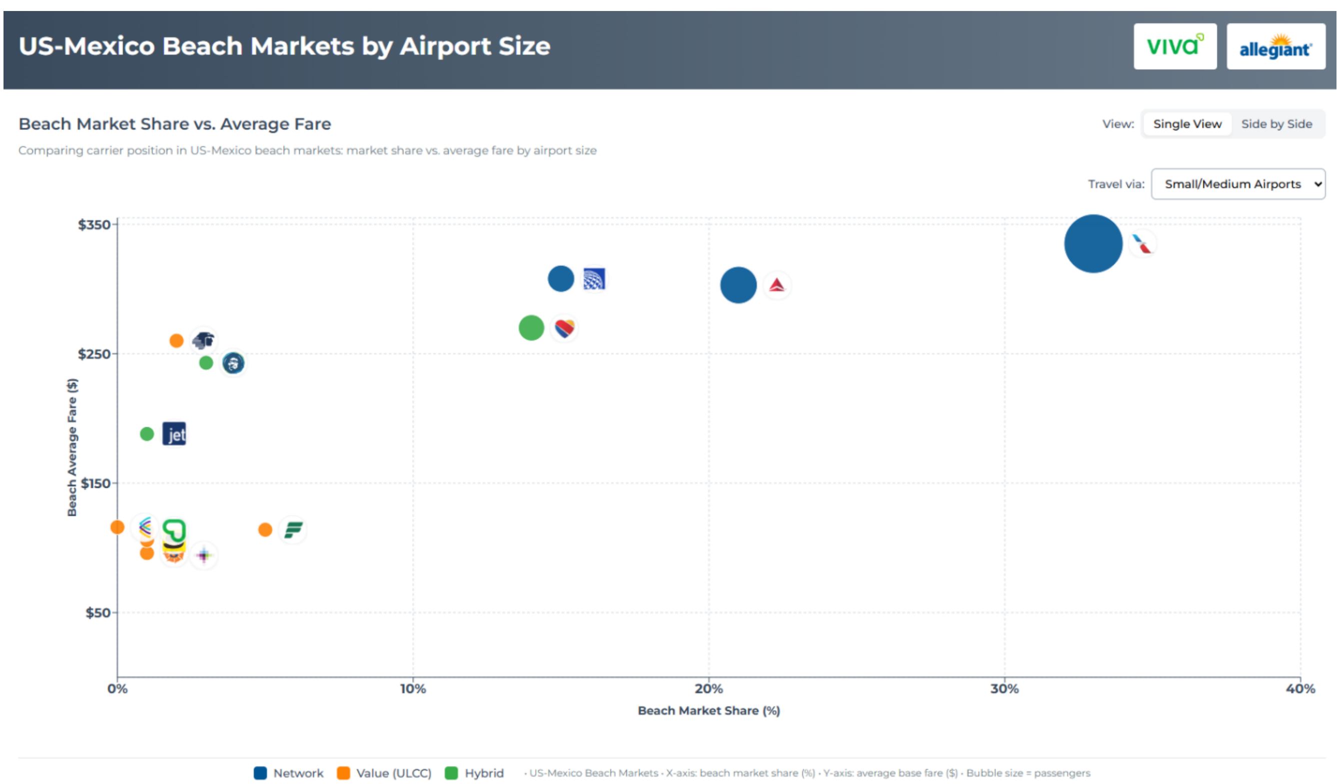


Table 3



The incredible lack of competition with legacy carriers on the Mexican beach market routes is made plain by comparing U.S. leisure destinations such as Orlando and Las Vegas. The traffic in those markets is represented in the graphics below and shows a vibrantly competitive market with value airlines holding significant share and disciplining the pricing of the legacy carriers with their pricing. That is *not* happening for U.S. travelers to Mexico, where value airlines are noticeably absent, and with travelers thus paying supra-competitive airfares. Under the DOT-perpetuated status quo, ironically, low-fare leisure carriers are unable to provide effective competition on leisure routes to Mexico as they do in U.S. leisure markets.

Table 4

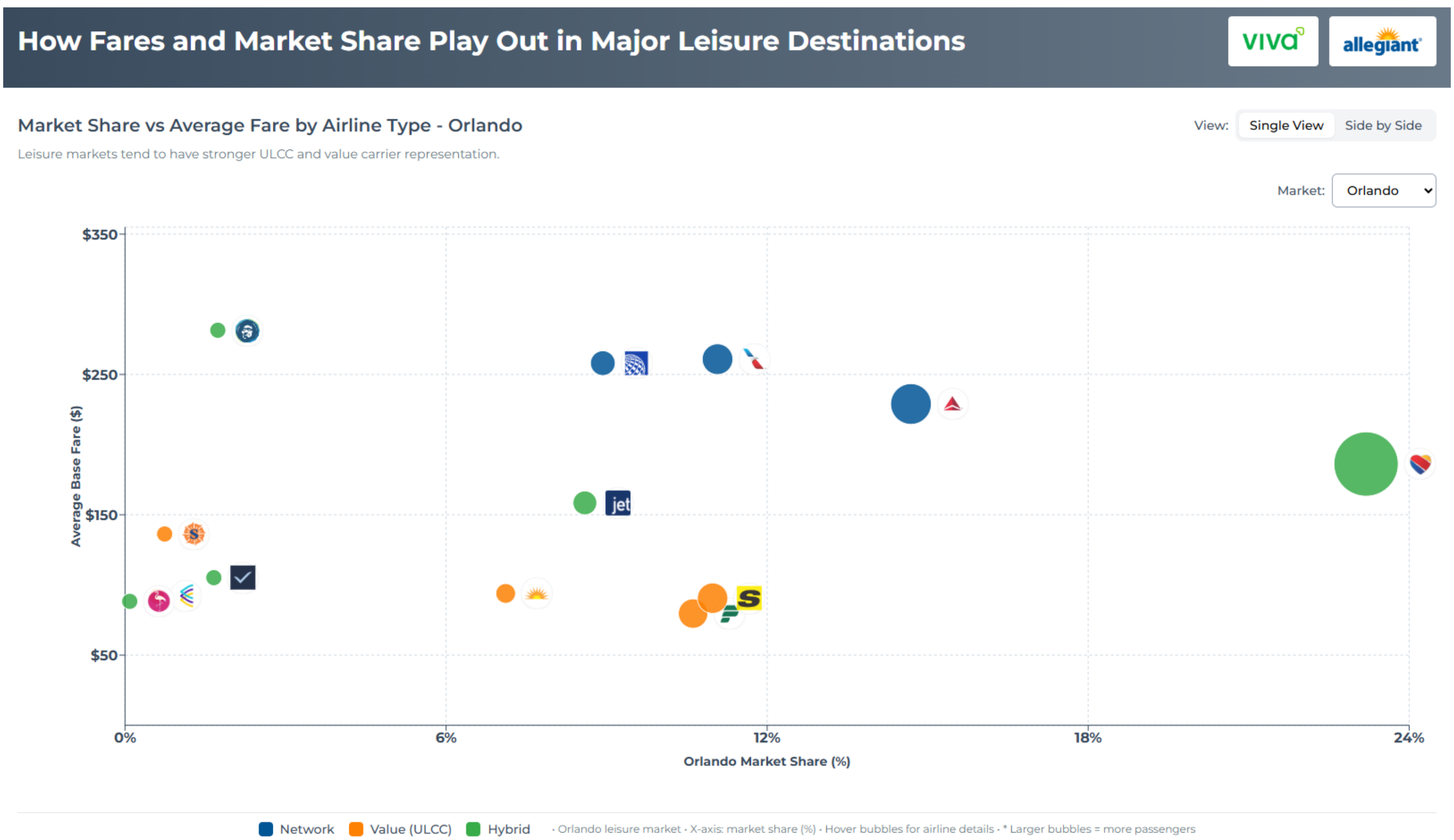
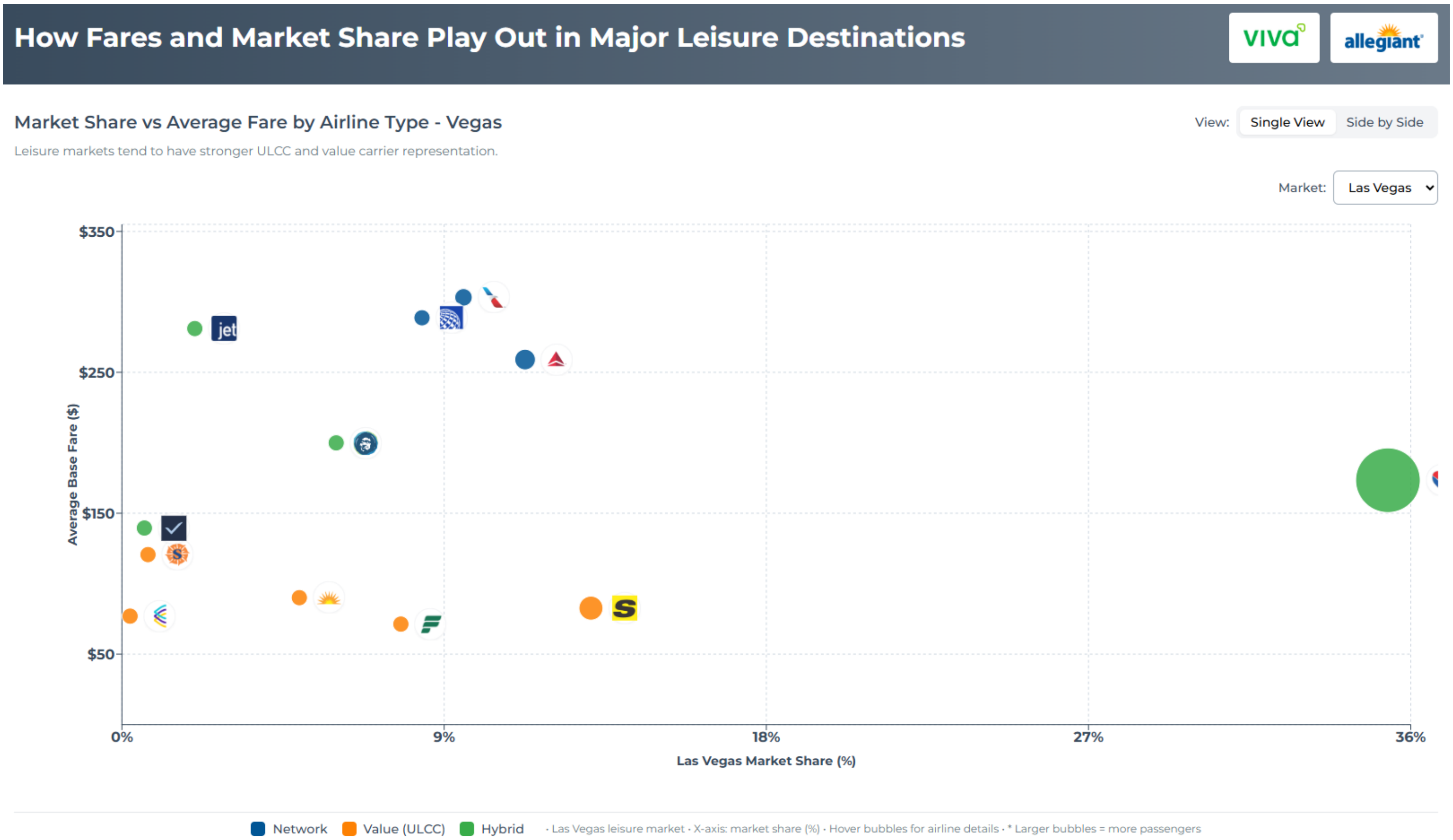


Table 5



As has been amply set forth in prior Allegiant/Viva submissions in this docket and in the Allegiant/Viva docket, the proposed Allegiant/Viva alliance would address this market failure and introduce over 90 new nonstop routes focused on U.S. small and medium-sized cities within two years. On those routes, the Allegiant/Viva alliance would reduce the average fare (including the network carriers' fares) by 51% and increase passenger traffic by 139%.[14] The barriers to entry for each of the carriers on a standalone basis are the facilities, know-how and inadequate customer bases to operate in foreign markets – not Mexican government policy. The

[14] Joint Objection of Allegiant Air and Viva Aerobus to Order to Show Cause, Ex. A at 9.

proposed alliance would overcome those barriers and would also allow the two airlines to take advantage of complementary fleet utilization efficiencies to increase total output.

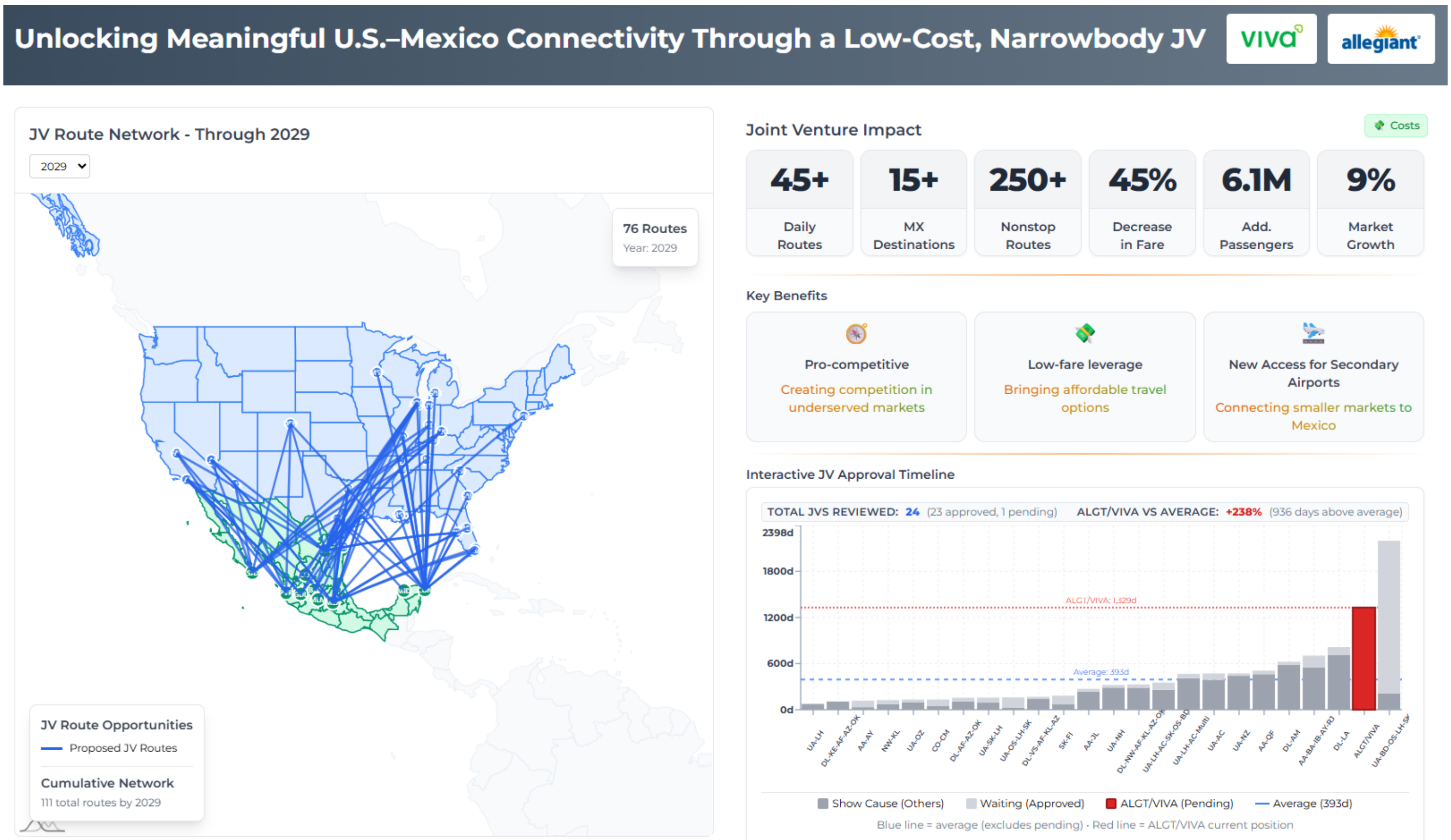
Allegiant is not present in the transborder market and Viva is not present on any scheduled U.S. to beach market route. Unlike in an alliance involving two large legacy carriers, there is no risk that the Allegiant/Viva alliance would gain enough market power to raise prices to anticompetitive levels. To the contrary, the Allegiant/Viva alliance would represent precisely the new entry and competition that Open Skies seeks to encourage. Allegiant and Viva would act as a discipline on the existing carriers in the market. Granting ATI to the Allegiant/Viva alliance would meet the objectives identified in the Order: "avoid[] unreasonable industry concentration" and "encour[age] entry into air transportation markets by new … carriers … to ensure a more effective and competitive airline industry[.]"[15]

The Allegiant/Viva alliance enables critical public benefits: added capacity and reduced fares. "Additional capacity that would otherwise not be possible is a key test for assessing whether an immunized JV is pro-competitive."[16] The alliance expects to increase passenger traffic on the routes it enters by 139%, and cause an overall expansion of 6.1 million passengers, with an additional 4.4 million existing passengers seeing their fares reduced through price competition.[17] The alliance would also "add flights at different time channels"[18] and "add new markets that they may not have served before"[19] to increase capacity in the transborder market, for example, by offering distinct point to point service, focused on beach destinations in Mexico (as opposed to MEX) and small to mid-sized cities in the United States that currently have no or

[15] Order 2025-07-12 at 12.
[16] *Id.* at 34.
[17] Joint Objection of Allegiant Air and Viva Aerobus to Order to Show Cause, Ex. A at 9.
[18] Order 2025-07-12 at 34.
[19] *Id.* at 34.

few nonstop options for travel to Mexico.[20]

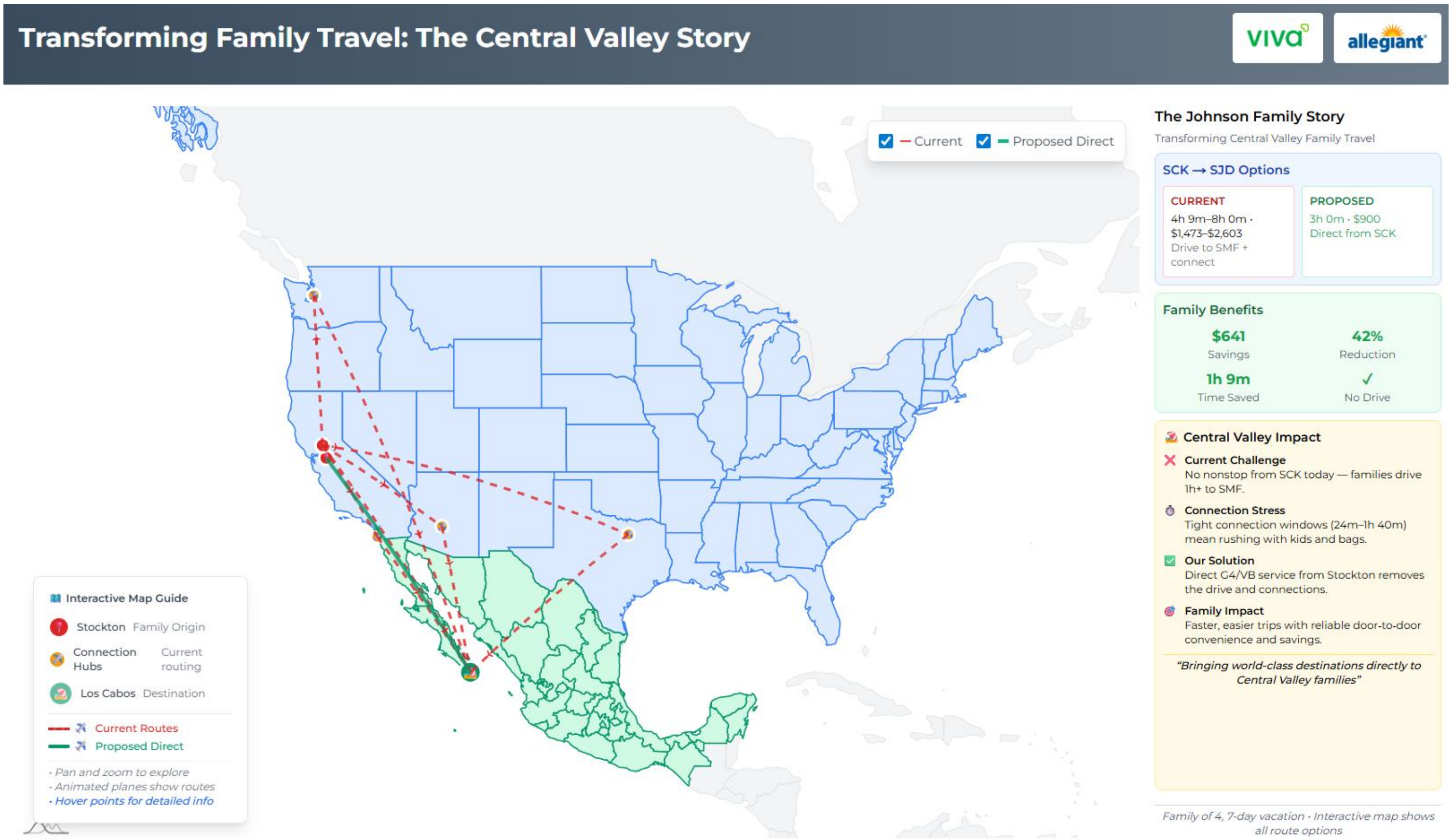
Table 6



While the aggregate numbers showing the expansion that will be created or induced by the Allegiant/Viva alliance are impressive in their own right, it is noteworthy that the alliance will provide Americans in small towns and cities nationwide the opportunity to enjoy an international trip – many for the first time. The graphic below presents the cost savings for a family in Stockton, California for taking such a trip, yielding a reduction of 42% in cost and a minimum of more than an hour of travel time in each direction. The analysis would be similar for residents of Western Pennsylvania, Indiana, and Nevada, among others.

[20] *Id*.

<u>**Table 7**</u>

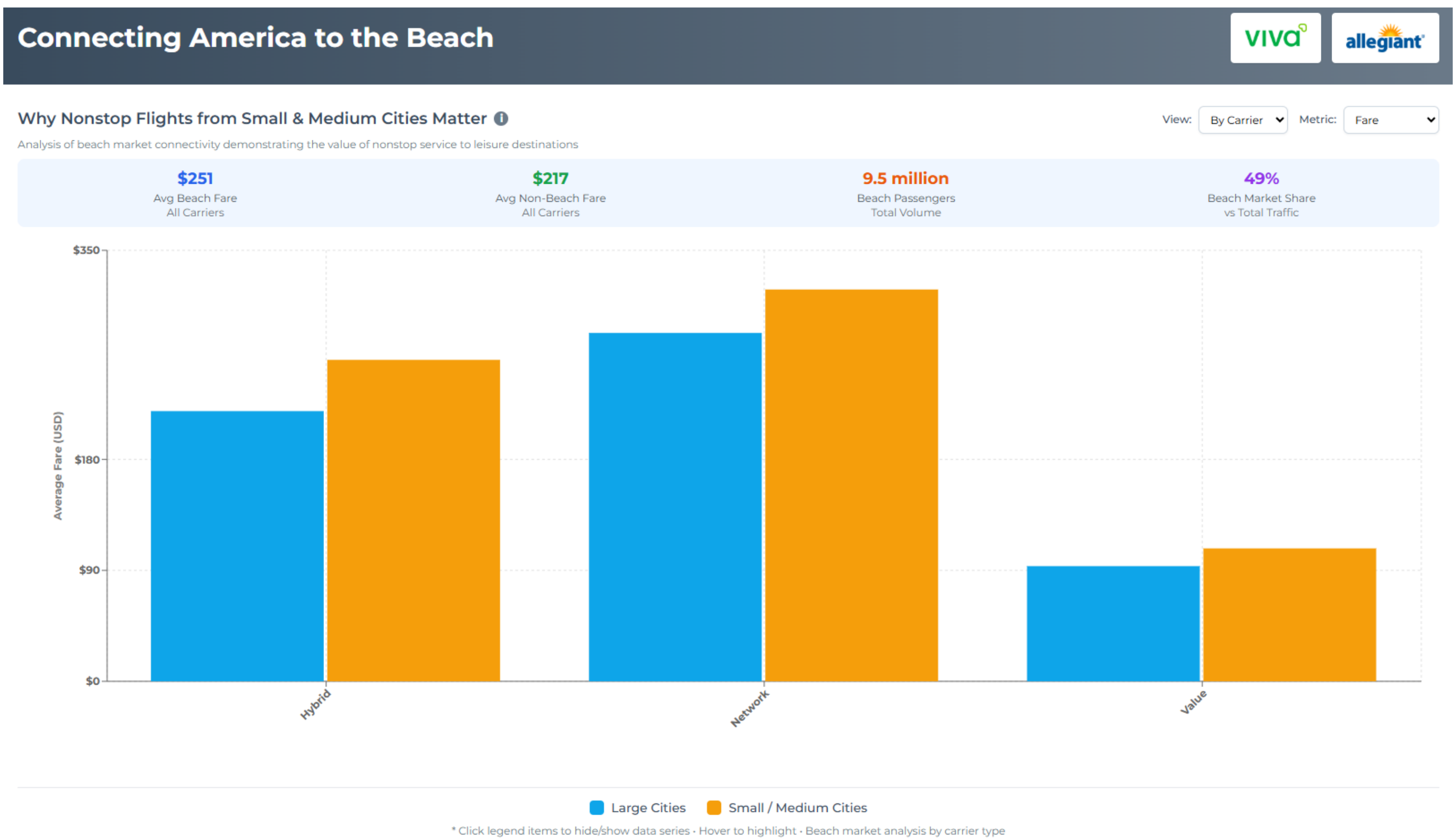


II. DOT Should Expedite Resolution of U.S.-Mexico Bilateral Issues.

The Allegiant/Viva alliance promises to bring significant benefits to American consumers, yet it has been pending before the Department for nearly four years. ATI approval will enable the delivery of immediate, tangible benefits to underserved city pairs, leisure travelers, and price-sensitive consumers. To the extent DOT requires that concerns regarding slot transparency in Mexico be resolved before ATI can be granted to a U.S./Mexico transborder alliance, Allegiant and Viva urge the Department to negotiate quickly to bring this issue to a practical and satisfactory resolution. Allegiant and Viva were encouraged to hear that the Trump Administration sent the Mexican Government a proposed framework of what it believes is necessary to comply with the Agreement.

As Allegiant and Viva have stated, unlike the Delta/Aeromexico alliance, their proposed alliance does not center on or create a competitive issue at MEX. The Allegiant/Viva and Delta/Aeromexico alliances differ fundamentally, i.e., in their geographic focus and their competitive impacts. The Allegiant/Viva alliance intends to principally serve leisure destinations in Mexico, not Mexico City.[21] The Parties expect the vast majority of their routes to serve these destinations, including Cancun/Tulum, Los Cabos, and Puerto Vallarta. Only 6% of contemplated alliance routes touch Mexico City. Nonstop flights to these "beach" destinations will result in particularly dramatic savings.

<u>Table 8</u>



On the other hand, MEX is the hub of the Delta/Aeromexico alliance and the vast

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[21] Based on planned routes three years following the launch of the alliance.

majority of Aeromexico's services are MEX O&D or connect through MEX. Given its high market share, the Delta/Aeromexico alliance could raise concerns about market power at MEX. In its initial order granting ATI to Delta/Aeromexico, DOT required MEX slot divestitures because the alliance "would be able to exert market power between the United States and MEX."[22] For Allegiant and Viva, carving out Mexico City from the alliance will not be akin to "removing the heart of the network" nor will it "impair significantly the public benefit resulting from the alliance."[23] Today, U.S. and Mexican legacy carriers capture 81% of total U.S.-Mexico City traffic, while Viva has only 8% and Allegiant has no scheduled transborder flights. DOT should therefore use its discretion to promptly approve the Allegiant/Viva alliance or in the alternative, approve the alliance while carving out MEX. As noted in the Order, DOT is seeking to avoid worsening the capacity reduction created by the Government of Mexico actions.[24] Issuance of ATI for the Allegiant/Viva alliance will in fact mitigate the capacity reduction and enhance transborder competition significantly.

III. Advancing Low Fare Value Carriers' Access to International Markets is Important to Their Success and Unlocking the Potential of the Largest International Markets

Value airlines (low-cost and ultra-low cost carriers) including Allegiant have fundamentally reshaped U.S. air travel since 2000. Value airlines are responsible for a 152% growth in traffic with only a 10% increase in fares since 2000, while legacy carriers are responsible for only 6% growth in traffic but with a 42% increase in fares. Value airlines disproportionately drive consumer benefits, but they are also disproportionately impacted by governmental policy that – intentionally or not – favors large airlines.[25] The market continues to

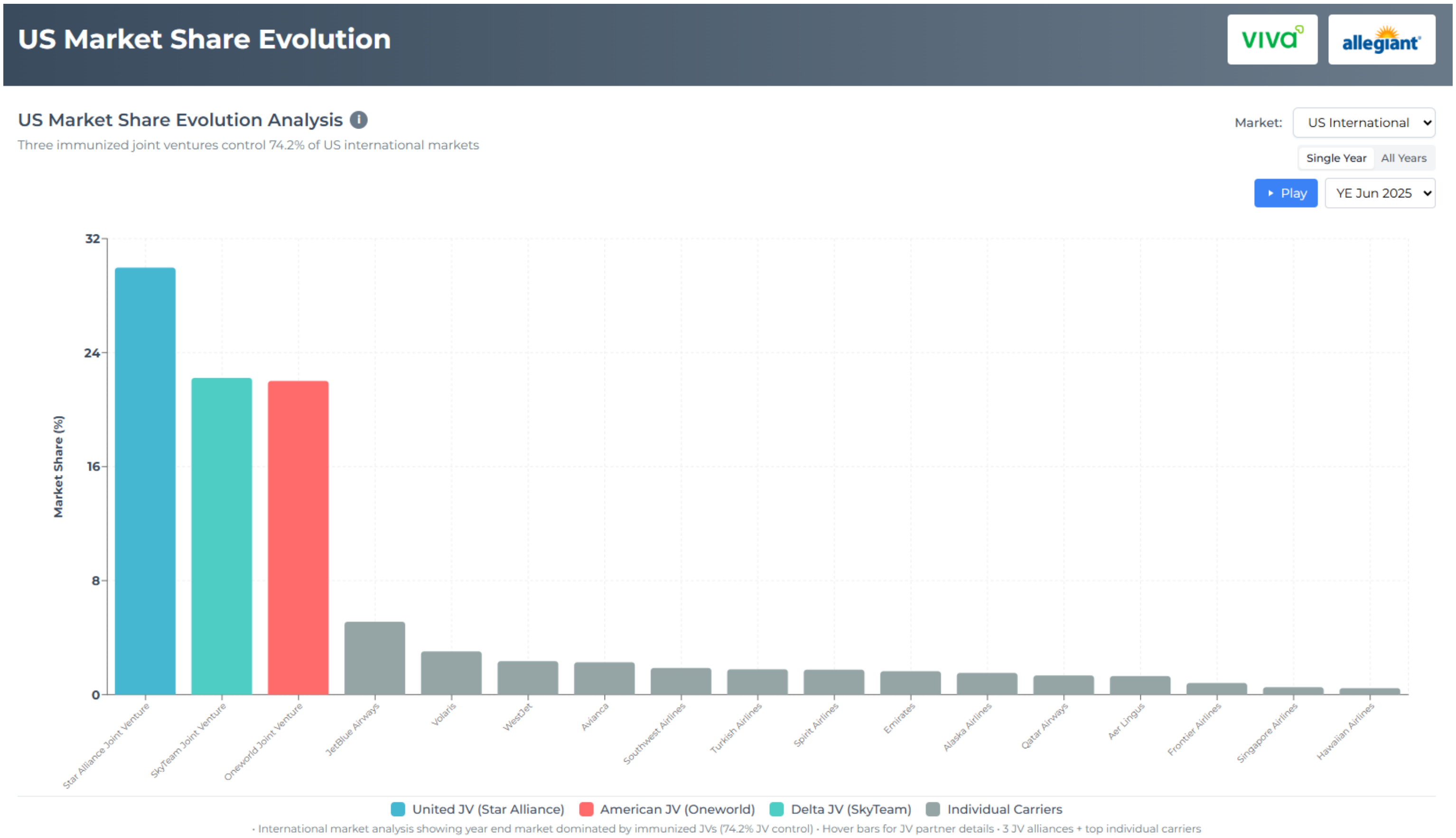
[22] Final Order, Order 2016-12-13, at 19, Docket DOT-OST-2015-0070-0096 (Dec. 14, 2016).
[23] Order 2025-07-12 at 29.
[24] *Id.* at 20, 22.
[25] Request for Information on Competition in Air Transportation, Submission of Allegiant Air, LLC at 3, DOJ Docket No. ATR 103.

be dominated by entrenched network carriers, despite average fares nearly triple that of value airlines.

Allegiant and Viva propose to implement an innovative joint venture that would serve as a model for how other value airlines can enter and compete in the international marketplace, which is in dire need of new competition. The Allegiant/Viva alliance would bring competitive benefits and erode supra-competitive pricing in the largest international air market for the United States -- unlocking new, affordable, nonstop options for millions of Americans. These benefits would be captured overwhelmingly by U.S. citizens and residents – 71% of travel in the transborder market is purchased and originates in the U.S., and for flights between the United States and Mexican beach destinations that proportion rises to 83%.

The Allegiant/Viva joint venture would ensure a more level playing field between value airlines and network carriers, who have benefited greatly from their dominance of international markets. As demonstrated in the graphic below, the three legacy network carriers have dominated international travel by launching transatlantic and transpacific immunized alliances amid a relative absence of value airline competition in the two largest international markets: U.S. to Mexico and U.S. to Canada.

Table 9



In analyzing the legacy carrier alliances, DOT has rightly focused on the value of combining complementary networks across continents and the elimination of double marginalization, while seeking to avoid or mitigate market power stemming from consolidation of trunk routes. Yet the greatest public benefit from alliances serving the U.S.-Mexico and U.S.-Canada markets will come from facilitating the expansion of new direct connections that are predominantly medium haul flights served by narrow body aircraft with increasing passenger capacity. This phenomenon is seen worldwide where nine of the ten largest international markets are predominantly medium haul with narrow body aircraft (including U.S.-Mexico and U.S.-Canada). The largest of those (U.K.-Spain) is served by various low-fare carrier options.

To counter the anticompetitive structure of the U.S.-Mexico market, DOT should facilitate rather than further delay entry of value airline alliances. In the meantime, with or without ATI, the legacy airlines will continue to accrue monopoly profits while millions of Americans are effectively denied the opportunity to fly in the United States' largest transborder market due to supra-competitive pricing and inferior service options.

Table 10

* * *

Allegiant and Viva appreciate the Department's consideration of these comments and urge DOT to proceed as set forth above.

Respectfully submitted,

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/s/ Thomas Mueller
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August 11, 2025

CERTIFICATE OF SERVICE

I hereby certify that I have on this day served a copy of the foregoing upon all persons named below via email.

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Vanessa C. Krasniewicz

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