



VIA REGULATIONS.GOV & EMAIL

July 17, 2020

Mr. Todd Homan
Director
Office of Aviation Analysis
U.S. Department of Transportation
1200 New Jersey Avenue, S.E.
Washington, D.C. 20590

Re: Joint Application of Hawaiian Airlines, Inc. and Japan Airlines Co., Ltd.
for Approval of and Antitrust Immunity for Alliance Agreements
Docket DOT-OST-2018-0084

Dear Mr. Homan:

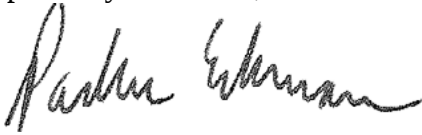
The final order issued in the above-referenced proceeding approves the commercial agreements between Hawaiian Airlines, Inc. ("Hawaiian") and Japan Airlines Co., Ltd. ("JAL") submitted in the docket as they relate to foreign air transportation, to the extent the agreements are consistent with U.S. antitrust law. That approval becomes effective when Hawaiian and JAL submit their final agreements, so long as they do so within six months of the date of issuance of the final order. See Ordering Paragraph 1 of Order 2020-3-5 (Mar. 13, 2020).

To satisfy this condition to the effectiveness of the final order, Hawaiian and JAL respectfully refer the Department to the agreements submitted by Hawaiian and JAL in the docket, including their Codeshare Agreement, Frequent Flyer Program Agreement, Amended Special Prorate Agreement and Commercial Cooperation Agreement.¹ Hawaiian and JAL also wish to inform the Department that they are assessing revisions to their Commercial Cooperation

¹ See Joint Application [PUBLIC], June 15, 2018, DOT-OST-2018-0084-0002 at Appendix 1 (Commercial Cooperation Agreement), Appendix 3 (Frequent Flyer Program Agreement), Appendix 4 (Amended Special Prorate Agreement) and Appendix 5 (Codeshare Agreement).

Agreement and their Joint Venture Agreement that would allow for a renewed request for antitrust immunity for their Joint Venture Agreement should they choose to do so in the future.

Respectfully submitted,



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CERTIFICATE OF SERVICE

I certify that on July 17, 2020, I caused to be served a copy of the foregoing Letter by email upon those addresses listed below:

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/s/ Erin Combs
Erin Combs