

BEFORE THE
DEPARTMENT OF TRANSPORTATION
WASHINGTON, D.C.

Application of

UNITED AIRLINES, INC.

for renewal of exemption under 49 U.S.C. § 40109
(mail-only codeshare with Aegean Airlines)

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: Docket DOT-OST-2018-0122
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APPLICATION OF
UNITED AIRLINES, INC. FOR
RENEWAL OF AN EXEMPTION

Communications with respect to this document should be sent to:

Steve Morrissey
Vice President—
Regulatory & Policy
UNITED AIRLINES, INC.
815 Connecticut Avenue, NW
Suite 500 – DCAIZ
Washington, DC 20006
(202) 521-4373
steve.morrissey@united.com

Daniel A. Weiss
Managing Director—
International Affairs & Regulatory
UNITED AIRLINES, INC.
233 South Wacker Drive
10th Floor – HDQIZ
Chicago, IL 60606
(872) 825-6828
dan.weiss@united.com

James Conneely
Associate General Counsel—
Regulatory, Environmental,
Facilitation, and Government Affairs
UNITED AIRLINES, INC.
233 South Wacker Drive
11th Floor – HDQLD
Chicago, IL 60606
(872) 825-8311
james.conneely@united.com

Amna Arshad
Freshfields Bruckhaus
Deringer US LLP
700 13th Street, N.W.
10th Floor
Washington, DC 20005
(202) 777-4596
amna.arshad@freshfields.com

Counsel for
United Airlines, Inc.

June 19, 2020

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APPLICATION OF
UNITED AIRLINES, INC. FOR
RENEWAL OF AN EXEMPTION

United¹ applies, pursuant to 49 U.S.C. § 40109 and Subpart C of the Department of Transportation’s Rules of Practice (14 C.F.R. Part 302), for renewal of its exemption authority to provide scheduled foreign air transportation of mail between any point or points in the United States and any point or points in the European Union on Aegean Airlines flights. United requests that this renewed exemption authority be effective for a period of at least two years consistent with Department precedent.

United respectfully states as follows in support of this application:

1. United is a corporation organized under the laws of the State of Delaware with its principal place of business at 233 South Wacker Drive, Chicago, IL 60606.
2. United is a citizen of the United States as that term is defined in 49 U.S.C. § 40102(a)(15)(C). United holds various certificates of public convenience and necessity and

¹ Common names are used for airlines.

Application of United

exemptions authorizing it to engage in scheduled air transportation of persons, property and mail between the U.S. and foreign countries, and United is fit, willing and able to provide the service for which it seeks renewal. *See, e.g.*, Orders 2013-4-11 (reissuing United/Continental authorities to United), 2011-3-14 (United/Continental route transfer), 2007-4-19 (Blanket Open Skies), and Notice of Action Taken dated May 14, 2019, in Docket DOT-OST-2004-19148 (blanket worldwide codesharing). United requests that the Department take official notice, pursuant to Rule 24 of its Rules of Practice, of all data filed to date to establish United's fitness.

3. United's exemption authority to provide scheduled foreign air transportation of mail between any point or points in the United States and any point or points in the European Union on Aegean Airlines flights was originally granted by Notice of Action Taken dated August 23, 2018, in this docket. United requires renewal of its exemption authority to continue to hold out service. United's exemption authority will expire on August 23, 2020.

4. Aegean Airlines holds a blanket statement of authorization to display United's "UA*" designator code on flights that Aegean Airlines operates for the limited purpose of allowing United to transport U.S. mail (i) between points in the United States and points in the European Union ("EU"), directly and via intermediate points; (ii) between EU points; (iii) between points in Greece; (iv) between points in the EU and points in Greece and points in the European Common Aviation Area ("ECAA") where an open-skies agreement is being applied; (v) between the EU or Greece and any open-skies point or points; and (vi) beyond the EU or Greece to any point or points. *See* Notice of Action Taken dated August 23, 2018, Docket DOT-OST-2018-0122. Aegean Airlines also holds a Foreign Air Carrier Permit to engage in foreign scheduled and air charter air transportation of persons, property and mail to the extent necessary to permit mail-only codeshare operations within the EU and between the EU and third countries. *See* Order 2010-9-19.

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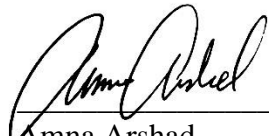
5. Approval of this application is in the public interest and will provide significant benefits to mail customers in these markets. Approval of this application will also provide United with a cost-efficient means of offering such mail transportation services.

6. Approval of this application is fully consistent with United's Civil Reserve Air Fleet commitments. In addition, grant of the requested authority will not cause a near-term net annual change in United's aircraft fuel consumption of 10 million gallons or more and will not, therefore, constitute a major regulatory action under Part 313 of the Department's Procedural Regulations.

7. United invokes the automatic extension provisions of 5 U.S.C. § 558(c), as implemented by Part 377 of the Department's Special Regulations, to continue this exemption authority in effect pending action on this renewal application. United's renewal application is timely filed under Part 377.

WHEREFORE, United respectfully requests the Department to renew its exemption authority to provide scheduled foreign air transportation of mail between any point or points in the United States and any point or points in the European Union on Aegean Airlines flights, and to grant such other relief as the Department deems necessary or appropriate.

Respectfully submitted,



Amna Arshad
Freshfields Bruckhaus
Deringer US LLP

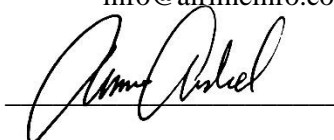
June 19, 2020

Counsel for United Airlines, Inc.

CERTIFICATE OF SERVICE

I certify that I have this date served the foregoing document on the following persons in accordance with the Department's Rules of Practice:

ABX Air, Inc.	Robert Silverberg	rsilverberg@sbgdc.com
	Jeff Johnson	jjohnson@sbgdc.com
Allegiant	Aaron Goerlich	agoerlich@ggh-airlaw.com
American	Robert Wirick	robert.wirick@aa.com
	John Williams	john.b.williams@aa.com
Amerijet	Joan Canny	jcanny@amerijet.com
Atlas	Russell Pommer	rpommer@atlasair.com
	Naveen Rao	naveen.rao@atlasair.com
Delta	Alexander Krulic	alex.krulic@delta.com
	Chris Walker	chris.walker@delta.com
	Steve Seiden	steven.seiden@delta.com
FedEx	Anne Bechdolt	anne.bechdolt@fedex.com
	Sandra Lunsford	sllunsford@fedex.com
Frontier	Howard Diamond	howard.diamond@flyfrontier.com
JetBlue	Robert Land	robert.land@jetblue.com
	Reese Davidson	reese.davidson@jetblue.com
Hawaiian	Aaron Alter	aaron.alter@hawaiianair.com
	Parker Erkmann	perkmann@cooley.com
	Julia Renehan	jrenehan@cooley.com
Kalitta Air	Mark W. Atwood	matwood@cozen.com
National	Malcolm Benge	mlbenge@zsrlaw.com
	John Richardson	jrichardson@johnrichardson.com
Polar Air Cargo	Kevin Montgomery	kevin.montgomery@polaraircargo.com
Southwest	Bob Kneisley	bob.kneisley@wnco.com
	Leslie Abbott	leslie.abbott@wnco.com
Spirit	David Kirstein	dkirstein@yklaw.com
	Joanne Young	jyoung@yklaw.com
Suncountry	Brandon Carmack	brandon.carmack@suncountry.com
	Kristen Peterson	kristen.peterson@suncountry.com
	Eric Levenhagen	eric.levenhagen@suncountry.com
UPS	Dontai Smalls	dsmalls@ups.com
	Anita Mosner	anita.mosner@hklaw.com
State/FAA/DOT	Aaron Forsberg	forsbergap@state.gov
	John Duncan	john.s.duncan@faa.gov
	Todd Homan	todd.homan@dot.gov
	Robert Finamore	robert.finamore@dot.gov
	Brett Kruger	brett.kruger@dot.gov
	Benjamin Taylor	benjamin.taylor@dot.gov
	Airlineinfo	info@airlineinfo.com



Amna Arshad

June 19, 2020