

BEFORE THE
DEPARTMENT OF TRANSPORTATION
WASHINGTON, D.C.

Application of

Sun Country, Inc.
d/b/a SUN COUNTRY AIRLINES

Docket DOT-OST-2018-0130

For an exemption pursuant to 49 U.S.C. § 40109
to engage in scheduled foreign air transportation of
persons, property and mail between the United
States and Belize

**APPLICATION OF SUN COUNTRY, INC. D/B/A SUN COUNTRY AIRLINES
FOR RENEWAL OF EXEMPTION AUTHORITY**

Communications with respect to this document should be addressed to:

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NOTICE: Any person may support or oppose this application by filing an answer and serving a copy of the answer on above-named counsel and all persons served with this application no later than July 28, 2020.

July 13, 2020

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**APPLICATION OF SUN COUNTRY, INC. D/B/A SUN COUNTRY AIRLINES
FOR RENEWAL OF EXEMPTION AUTHORITY**

Sun Country, Inc. d/b/a Sun Country Airlines (Sun Country), pursuant to 49 U.S.C. § 40109 and Subpart C of the Department's Rules of Practice, hereby applies for renewal of its exemption authority to provide scheduled foreign air transportation between the United States and Belize.¹ Consistent with the October 2018 U.S.-Belize Air Transport Agreement, Sun Country requests authority to engage in scheduled and charter foreign air transportation of persons, property and mail from points behind the United States via the United States and intermediate points to any point or points in Belize and beyond; and for all-cargo service, between Belize and any point or points. Sun Country requests that this authority be effective for a period of at least two years consistent with Department precedent. In support of this application, Sun Country states as follows:

1. Sun Country is a corporation organized under the laws of the State of Minnesota with its principal place of business at 2005 Cargo Road, Minneapolis, Minnesota 55450.

¹ When Sun Country's current U.S.-Belize authority was issued (Notice of Action Taken dated Sept. 18, 2018 in this docket), Sun Country's corporate name was MN Airlines, LLC. In 2019 the corporate name was changed to Sun Country, Inc., with the carrier's certificates of public convenience and necessity reissued in its new name; *see* Order 2019-6-6, June 6, 2019. In that order the Department stated, "The exemptions issued to MN Airlines will be reissued in the air carrier's new name if and when each is renewed." Order 2019-6-6 at 2 n. 4.

2. Sun Country is a citizen of the United States within the meaning of 49 U.S.C. § 40102(a)(15)(C). Sun Country is fit, willing and able to provide the services contemplated by this application and holds various certificate and exemption authorities allowing it to engage in scheduled air transportation of persons, property and mail domestically and internationally. Sun Country's Certificates of Public Convenience and Necessity were reissued most recently by Order 2019-6-6, including an open-skies certificate. The carrier holds or has held exemption authorities issued by the Department in Dockets DOT-OST-2018-0130, 2016-0021, 2016-0143, 2015-0086, 2014-0086, 2012-0175, 2012-0065, and 2002-12211. Sun Country requests that the Department take official notice of all information previously filed to establish its fitness.

3. Sun Country's U.S.-Belize exemption authority was originally issued by Notice of Action dated September 18, 2018 in this docket. Absent renewal, the authority will expire on September 18, 2020.² While Sun Country has temporarily discontinued service to Belize, it plans to resume such service in late 2020.

4. Renewal of this exemption authority is consistent with the October 2018 U.S.-Belize Air Transport Agreement (ATA). As noted above, Sun Country requests that the authority issued in response to this application represent the full measure of scheduled and charter authority available to U.S. carriers under the ATA.

5. Sun Country's fuel consumption for Belize service will not exceed the ten million gallon threshold specified in Section 313.4 of the Department's Economic Regulations.

6. Grant of this application would be in the public interest as it would be consistent with the

² Sun Country 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 its authority in effect pending action on this renewal application. This application is timely filed under Part 377.

ATA and would allow Sun Country to resume providing quality low-fare service and competition on routes between the United States and Belize.

WHEREFORE, Sun Country, Inc. d/b/a Sun Country Airlines requests that the Department renew its scheduled and charter U.S.-Belize exemption authority in the manner set forth in this application.

Respectfully submitted,

A handwritten signature in dark ink, appearing to read "Aaron A. Goerlich". The signature is fluid and cursive, with the first name "Aaron" and last name "Goerlich" being the most prominent parts.

Aaron A. Goerlich
Garofalo Goerlich Hainbach PC

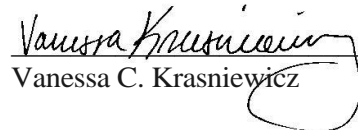
*Counsel for Sun Country, Inc. d/b/a
Sun Country Airlines*

July 13, 2020

CERTIFICATE OF SERVICE

I hereby certify that I served a copy of the foregoing application of Sun Country, Inc. d/b/a Sun Country Airlines on July 13, 2020, by e-mail upon each of the following persons:

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