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

| | | |
|---|---|---|
| U.S. – HAVANA PUBLIC CHARTER AUTHORIZATIONS | ) | Docket DOT-OST-2020-0011 |

ANSWER OF HAVANA AIR


Mark A. Elias
President & COO
David A. Nesslein
Chairman & CEO
ViajeHoy Charters, LLC
d/b/a Havana Air
4138 S.W. 16th terrace
Miami, FL 33134

Pierre Murphy
Law Offices of Pierre Murphy
1200 New Hampshire Avenue N.W.
Suite 590
Washington DC 20036
(202) 776-3980
pmurphy@lopmurphy.com

Counsel for Havana Air


February 19, 2020

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

| | | |
|---|---|---|
| U.S. – HAVANA PUBLIC CHARTER AUTHORIZATIONS | ) | Docket DOT-OST-2020-0011 |

## ANSWER OF HAVANA AIR

Pursuant to the terms of Show Cause Order 2020-1-16, ViajeHoy Charters, d/b/a Havana Air ("Havana Air") respectfully submits this Answer to the various filings herein filed February 12, 2020 by a number of parties.

## ANSWER

1. CTS

Despite not being listed as a current or recent Cuba Part 380 Public Charter Operator ("PC Operator") in the Department's Show Cause Order analysis and summary of past-year/current Cuba PC Operators, Cuba Travel Services, Inc. ("CTS") has filed objections herein indicating it now wants to be a PC Operator.[1] However, CTS Provides scant details of its new charter plans.

1/ Whereas CTS Objects to the required Notice filed by Swift, curiously CTS did not object to the Notice similarly required to be filed by World Atlantic.

CTS admits the HAV charters it states it now plans now operating will be "new charter services," and also further admits it has in fact not operated any charters to Cuba in the past 3+ years since 2016. CTS Objections, p.2. CTS states that it was obliged back in 2016 to "re-evaluate" its indirect air carrier services previously operated as an OFAC CSP/DOT PC Operator and that it decided to suspend such services "temporarily" due to the scheduled air carrier service to Cuba (ie: American Airlines, JetBlue, Delta, Southwest). Id. Instead of charters, CTS has in recent years restricted itself to the sale, as travel agent, of scheduled tickets of American, JetBlue, etc.... Indeed, on its website today, CTS not only does not offer any charter services, it unambiguously states its business as being that of a travel agent selling the scheduled air tickets of American Airlines, JetBlue, Delta, & Southwest. See: https://www.cubatravelservices.om/plan-your-trip/ (copy attached at Tab 1). CTS is therefore clearly not a seller of any charter services[2] and, for the purposes of this allocation proceeding, the Department did not list CTS as a current or even recent Cuba PC Operator because it is not such a PC Operator.

Regarding CTS' plans for purported new charters, they are unacceptably vague. CTS has curiously failed to identify how many PC flights it might operate, fails to identify which direct air carrier(s) it states it has executed a charter agreement(s) with, or which direct air carrier will file an application for an allocation (but will only do this after issuance of the Final Order). CTS'

2/ On its website, as travel agent CTS only holds out MIA-HAV scheduled services of American and on FLL-HAV the scheduled services of JetBlue. See: CTS booking results, Tab 2. Further, CTS on its website holds out, again as agent, one-stop scheduled services of foreign air carriers to non-HAV cities like Santa Clara (SNU) for the period commencing after March 10, 2020, the date beyond which US charter services are now prohibited (US scheduled carriers have since December 2019 been prohibited from such operation of scheduled services for these non-HAV cities). See: CTS website MIA-SNU & FLL-SNU search results – holding out COPA Airlines, etc..... services to SNU, copy attached Tab 3).

un-named contracted carrier cannot be Swift (CTS flights would have been listed in Swift's Notice as to firm contracts). Similarly, it cannot be World Atlantic, for the same reason. Or perhaps CTS/World Atlantic anticipates somehow using/have transferred to it the already problematic[3] World Atlantic/Superior allocations which were listed in the Show Cause Order and allocating them to CTS. Or perhaps CTS anticipates using as its purported direct air carrier another unidentified US charter carrier or a 7th freedom foreign air carrier.

Regardless, this total lack of clarity by CTS regarding its new charters and its status as an exclusive seller of existing substantial scheduled services to HAV and non-HAV cities is totally inconsistent with the purpose of the Show Cause Order and the concept of grandfathering-in of current/recent incumbent PC operations of the carriers/Cuba PC Operators which actually did operate as indirect air carriers in the market in the past several years and do so currently. CTS' stated intent to now resume PC operations after a 3+ year hiatus of its own commercial choosing is clearly totally opportunistic and speculative and violates the whole premise upon which this allocation proceeding was established and should be rejected.

2. World Atlantic/Superior

It is curious that Superior has filed no comment in support of its purported intent to re-initiate its collapsed/never commenced PC program of flights. This silence speaks volumes. In contrast to this silence from Superior however, various commenters have filed strong objections to any allocations to World Atlantic/Superior on the basis that: (i) World Atlantic is/was not an incumbent; (ii) the Superior PC Program contracted with World Atlantic collapsed and never

3/ See: various objections filed herein on February 12 against World Atlantic/Superior.

commenced with consequent stranding of passengers at MIA during a peak holiday season; and (iii) Superior never apparently received from Cuba the requisite landing-rights permissions that are critically required in order to operate any charters, etc.... See: Responses of Havana Air, Swift Air & Aerocuba; February 12, 2020.

World Atlantic, the direct air carrier for Superior's never-operated PC flights, of course does not address what happened with its PC Operator's abandoned flights (and it must surely know). However, World Atlantic clearly intends that "its" 355 allocations will somehow be used in another manner, raising the possibility of a transfer of those allocations to another PC Operator, including even a transfer of the allocations to itself as the PC Operator (ie: as both PC Operator and direct air carrier as a direct-sale PC product). These possibilities raised by World Atlantic merely reinforce the conclusion that World Atlantic's allocation is totally speculative and opportunistic amounting in effect to what it believes should be a transferable license-to-hunt. Such an interpretation is contrary to the Show Cause Order and directly contrary to concept of fairness to PC Operators which have a demonstrated history of actually operating their PC programs. World Atlantic/Superior's allocations should be rejected as being inconsistent with the Show Cause Order.

3. Cubazul

As with Superior, there has been silence from Cubazul in response to the Show Cause Order. This silence again speaks volumes, raising the question as to the seriousness of its opportunistic doubling-up of its existing historic flight schedule. Consistent with the Department's concept in the Show Cause Order of a grandfathering-in at current levels of

operations, Cubazul's opportunistic attempt to now double its flight schedule to the detriment of other incumbents in this flight-capped environment is inconsistent with the Show Cause Order and should not be permitted.

4. Aerocuba

Whereas Havana Air broadly agrees with Aerocuba's arguments: (i) regarding World Atlantic/Superior's failure to operate; and (ii) that the charter allocations should be to the true-parties-in-interest; the PC Operators, as opposed to the direct air carriers the PC Operators selected. Nothing in Aerocuba's objections justifies Aerocuba's attempt to essentially double-up its existing charter flight levels over its recent/historical levels to the detriment of the other incumbent PC Operators. As with Cubazul, Aerocuba's opportunistic attempt to double-up its frequencies should not be permitted.

WHEREFORE, for the reasons stated above and in its February 12 comments herein, Havana Air objects to the procedures and allocations proposed and applied for.

Respectfully Submitted,

Pierre Murphy
Law Offices of Pierre Murphy
1200 New Hampshire Avenue N.W.
Suite 590
Washington DC, 20036

Counsel for Havana Air

February 19, 2020

# TAB 1

Our partnerships with American Airlines, Alaska Airlines, Southwest, JetBlue and Delta offer the most flexible schedule to our passengers when booking their next flight to Cuba.

**PURCHASE TODAY**

## Hotel Reservations, Car Rental and Ground Transportation

Long standing, strong relationships with the largest hotel chains in Cuba allow us to get some of the most competitive rates in the market. This benefits our clients as we pass on the savings to them. We also work with various car rental companies offering flexibility -from economy to luxury. If you're part of a group, you'll love the experience the tour busses have to offer- complete with AC and modern features.

**PURCHASE TODAY**

By browsing our website, you consent to our use of cookies and other tracking technologies.

Read More

ACCEPT

# TAB 2

CUBA TRAVEL SERVICES

Home | Flight | Log in / Register | English | Spanish

Plan Your Trip > Check Out > Confirmation

◉ Round Trip ○ One Way ○ Multi-leg

| From | To | Departure Date | | Return Date | | |
|---|---|---|---|---|---|---|
| Fort Lauderdale, US | Havana, Cuba | 03/21/2020 | Anytime | 03/28/2020 | Anytime | Search |

Advanced Options

**Results Filter 7 result(s)**

Unselect all filters

- Price ($)
- Departure Hour
- Arrival Hour
- Connections ($)
- Airlines ($)
- Airports ($)
- Duration
- Booking Class
- Cabin Classes ($)
- Luggage ($)

Show Additional Filters

**Matrix**

All Flights

| Airline(FLL>HAV) / Stop(FLL>HAV) | Copa Airlines | JetBlue | United Airlines | American Airlines | Aeromexico |
|---|---|---|---|---|---|
| Direct Flight | - | $ 558.85 | - | - | - |
| 1 Connection | $ 548.25 | $ 669.35 | $ 774.10 | - | - |

Minimum Maximum

**Itinerary**

Your shopping basket is empty

**History (1)**

Fort Lauderdale - Havana
Sat 21 Mar
1 Adult
Havana - Fort Lauderdale
Sat 28 Mar
1 Adult

Clear Result

Sort from lowest to highest pric | +/- 3 days

## Fort Lauderdale, FL, USA to Havana, Cuba

**Sat 21 Mar, Sat 28 Mar**

5 results out of 7

JetBlue Average price per person (includes Taxes and carrier-imposed fees): **$ 558.85** Hide

Total fare (includes Taxes and carrier-imposed fees): : **$ 558.85**

**Outbound: Fort Lauderdale - Havana Saturday, March 21, 2020**

Show Details

| JetBlue | Departs | Arriving | Duration | |
|---|---|---|---|---|
| jetBlue | Fll Intl, Fort Lauderdale (FLL) 1:28 PM | Jose Marti Intl, Havana (HAV) 2:45 PM | 01:17 Hours | Baggage Not Included |

**Inbound: Havana - Fort Lauderdale Saturday, March 28, 2020**

Show Details

| JetBlue | Departs | Arriving | Duration | |
|---|---|---|---|---|
| jetBlue | Jose Marti Intl, Havana (HAV) 6:30 PM | Fll Intl, Fort Lauderdale (FLL) 10:14 AM | 1 Connection 15:44 Hours Next day arrival! | Baggage Not Included |

Fare Details | Alternative Fares | More Information | Pin | Select

JetBlue Average price per person (includes Taxes and carrier-imposed fees): **$ 563.15** Hide

Total fare (includes Taxes and carrier-imposed fees): : **$ 563.15**

**Outbound: Fort Lauderdale - Havana Saturday, March 21, 2020**

Show Details

| JetBlue | Departs | Arriving | Duration | |
|---|---|---|---|---|
| | | | | Baggage |

| | | | | |
|---|---|---|---|---|
| jetBlue | Fll Intl, Fort Lauderdale (FLL) 1:28 PM | Jose Marti Intl, Havana (HAV) 2:45 PM | 01:17 Hours | Not Included |

**Inbound: Havana - Fort Lauderdale Saturday, March 28, 2020**

Show Details

| JetBlue | Departs | Arriving | Duration | |
|---|---|---|---|---|
| jetBlue | Jose Marti Intl, Havana (HAV) 6:30 PM | Fll Intl, Fort Lauderdale (FLL) 11:35 PM | 1 Connection 29:05 Hours Next day arrival! | Baggage Not Included |

Fare Details | Alternative Fares | More Information | Pin | Select

JetBlue Average price per person (includes Taxes and carrier-imposed fees): **$ 566.30** Hide

Total fare (includes Taxes and carrier-imposed fees): : **$ 566.30**

**Outbound: Fort Lauderdale - Havana Saturday, March 21, 2020**

Show Details

| JetBlue | Departs | Arriving | Duration | |
|---|---|---|---|---|
| jetBlue | Fll Intl, Fort Lauderdale (FLL) 1:28 PM | Jose Marti Intl, Havana (HAV) 2:45 PM | 01:17 Hours | Baggage Not Included |

**Inbound: Havana - Fort Lauderdale Saturday, March 28, 2020**

Show Details

| JetBlue | Departs | Arriving | Duration | | |
|---|---|---|---|---|---|
| jetBlue | Jose Marti Intl, Havana (HAV) 10:10 AM | Fll Intl, Fort Lauderdale (FLL) 9:25 AM | 1 Connection 23:15 Hours Next day arrival! | Operated by Gulfstream International | Baggage Not Included |

Fare Details | Alternative Fares | More Information | Pin | Select

JetBlue Average price per person (includes Taxes and carrier-imposed fees): **$ 579.75** Hide

Total fare (includes Taxes and carrier-imposed fees): : **$ 579.75**

**Outbound: Fort Lauderdale - Havana Saturday, March 21, 2020**

Show Details

| JetBlue | Departs | Arriving | Duration | |
|---|---|---|---|---|
| jetBlue | Fll Intl, Fort Lauderdale (FLL) 1:28 PM | Jose Marti Intl, Havana (HAV) 2:45 PM | 01:17 Hours | Baggage Not Included |

**Inbound: Havana - Fort Lauderdale Saturday, March 28, 2020**

Show Details

| JetBlue | Departs | Arriving | Duration | |
|---|---|---|---|---|
| jetBlue | Jose Marti Intl, Havana (HAV) 4:00 PM | Fll Intl, Fort Lauderdale (FLL) 5:15 PM | 01:15 Hours | Baggage Not Included |

Fare Details | Alternative Fares | More Information | Pin | Select

JetBlue Average price per person (includes Taxes and carrier-imposed fees): **$ 613.65** Hide

Total fare (includes Taxes and carrier-imposed fees): : **$ 613.65**

**Outbound: Fort Lauderdale - Havana Saturday, March 21, 2020**

Show Details

| JetBlue | Departs | Arriving | Duration | |
|---|---|---|---|---|
| jetBlue | Fll Intl, Fort Lauderdale (FLL) 1:28 PM | Jose Marti Intl, Havana (HAV) 2:45 PM | 01:17 Hours | Baggage Not Included |

**Inbound: Havana - Fort Lauderdale Saturday, March 28, 2020**

Show Details

| JetBlue | Departs | Arriving | Duration | |
|---|---|---|---|---|
| jetBlue | Jose Marti Intl, Havana (HAV) 6:30 PM | Fll Intl, Fort Lauderdale (FLL) 8:14 PM | 1 Connection 25:44 Hours Next day arrival! | Baggage Not Included |

Fare Details Alternative Fares More Information Pin Select

Prev 1 2 Next

5

CUBA TRAVEL SERVICES

Home | Flight

0 Log in / Register English Spanish

Plan Your Trip > Check Out > Confirmation

◉ Round Trip ○ One Way ○ Multi-leg

| From | To | Departure Date | | Return Date | | |
|---|---|---|---|---|---|---|
| Miami, USA | Havana, Cuba | 03/21/2020 | Anytime | 03/28/2020 | Anytime | Search |

Advanced Options

**Results Filter** 25 result(s)

Unselect all filters

- Price ($)
- Departure Hour
- Arrival Hour
- Connections ($)
- Airlines ($)
- Airports ($)
- Duration
- Booking Class
- Cabin Classes ($)
- Luggage ($)

Show Additional Filters

**Matrix**

All Flights

| Airline(MIA>HAV) / Stop(MIA>HAV) | American Airlines | Interjet | Aeromexico | Cayman Airways | Copa Airlines | Bahamasair | United Airlines | Air France |
|---|---|---|---|---|---|---|---|---|
| Direct Flight | $ 483.75 | - | - | - | - | - | - | |
| 1 Connection | - | $ 551.75 | $ 581.35 | $ 616.82 | $ 660.84 | $ 723.43 | $ 775.35 | $ 2,170.15 |

Minimum — Maximum

Sort from lowest to highest pri | +/- 3 days

## Miami, FL, USA to Havana, Cuba

Sat 21 Mar, Sat 28 Mar

5 results out of 25

American Airlines — Average price per person (includes Taxes and carrier-imposed fees): **$ 483.75** Hide

Total fare (includes Taxes and carrier-imposed fees): : $ 483.75

**Outbound: Miami - Havana Saturday, March 21, 2020**

| Airline | Departs | Arriving | Duration | |
|---|---|---|---|---|
| American Airlines | Miami Intl, Miami (MIA) 3:41 PM | Jose Marti Intl, Havana (HAV) 4:55 PM | 01:14 Hours | Show Details; Baggage Not Included ◉ |
| American Airlines | Miami Intl, Miami (MIA) 7:40 AM | Jose Marti Intl, Havana (HAV) 8:55 AM | 01:15 Hours | Show Details; Baggage Not Included ○ |
| American Airlines | Miami Intl, Miami (MIA) 6:55 PM | Jose Marti Intl, Havana (HAV) 8:10 PM | 01:15 Hours | Show Details; Baggage Not Included ○ |
| American Airlines | Miami Intl, Miami (MIA) 9:29 AM | Jose Marti Intl, Havana (HAV) 10:45 AM | 01:16 Hours | Show Details; Baggage Not Included ○ |
| American Airlines | Miami Intl, Miami (MIA) 10:31 AM | Jose Marti Intl, Havana (HAV) 11:50 AM | 01:19 Hours | Show Details; Baggage Not Included ○ |

**Itinerary**

Your shopping basket is empty

History (3)

Miami - Santa Clara
Sat 21 Mar
1 Adult

Santa Clara - Miami
Sat 28 Mar
1 Adult

Miami - Santa Clara
Sat 21 Mar
1 Adult

Santa Clara - Miami
Sat 28 Mar
1 Adult

Miami - Havana
Sat 21 Mar
1 Adult

Havana - Miami
Sat 28 Mar
1 Adult

Clear Result

Inbound: Havana - Miami Saturday, March 28, 2020

Show Details

| American Airlines | Departs | Arriving | Duration | |
|---|---|---|---|---|
| | Jose Marti Intl, Havana (HAV) 9:55 AM | Miami Intl, Miami (MIA) 11:07 AM | 01:12 Hours | Baggage Not Included |

Show Details

| American Airlines | Departs | Arriving | Duration | |
|---|---|---|---|---|
| | Jose Marti Intl, Havana (HAV) 9:05 AM | Miami Intl, Miami (MIA) 10:21 AM | 01:16 Hours | Baggage Not Included |

Fare Details | Alternative Fares | More Information | Pin | Select

American Airlines Average price per person (includes Taxes and carrier-imposed fees): **$ 504.75** Hide

Total fare (includes Taxes and carrier-imposed fees): : **$ 504.75**

Outbound: Miami - Havana Saturday, March 21, 2020

Show Details

| American Airlines | Departs | Arriving | Duration | |
|---|---|---|---|---|
| | Miami Intl, Miami (MIA) 6:48 AM | Jose Marti Intl, Havana (HAV) 8:05 AM | 01:17 Hours | Baggage Not Included |

Inbound: Havana - Miami Saturday, March 28, 2020

Show Details

| American Airlines | Departs | Arriving | Duration | |
|---|---|---|---|---|
| | Jose Marti Intl, Havana (HAV) 9:55 AM | Miami Intl, Miami (MIA) 11:07 AM | 01:12 Hours | Baggage Not Included |

Show Details

| American Airlines | Departs | Arriving | Duration | |
|---|---|---|---|---|
| | Jose Marti Intl, Havana (HAV) 9:05 AM | Miami Intl, Miami (MIA) 10:21 AM | 01:16 Hours | Baggage Not Included |

Fare Details | Alternative Fares | More Information | Pin | Select

American Airlines Average price per person (includes Taxes and carrier-imposed fees): **$ 512.75** Hide

Total fare (includes Taxes and carrier-imposed fees): : **$ 512.75**

Outbound: Miami - Havana Saturday, March 21, 2020

Show Details

| American Airlines | Departs | Arriving | Duration | |
|---|---|---|---|---|
| | Miami Intl, Miami (MIA) 3:41 PM | Jose Marti Intl, Havana (HAV) 4:55 PM | 01:14 Hours | Baggage Not Included |

Show Details

| American Airlines | Departs | Arriving | Duration | |
|---|---|---|---|---|
| | Miami Intl, Miami (MIA) 7:40 AM | Jose Marti Intl, Havana (HAV) 8:55 AM | 01:15 Hours | Baggage Not Included |

Show Details

| American Airlines | Departs | Arriving | Duration | |
|---|---|---|---|---|
| | Miami Intl, Miami (MIA) 6:55 PM | Jose Marti Intl, Havana (HAV) 8:10 PM | 01:15 Hours | Baggage Not Included |

Show Details

| American Airlines | Departs | Arriving | Duration | |
|---|---|---|---|---|
| | Miami Intl, Miami (MIA) 9:29 AM | Jose Marti Intl, Havana (HAV) 10:45 AM | 01:16 Hours | Baggage Not Included |

Show Details

| American Airlines | Departs | Arriving | Duration | |
|---|---|---|---|---|
| | Miami Intl, Miami (MIA) 10:31 AM | Jose Marti Intl, Havana (HAV) 11:50 AM | 01:19 Hours | Baggage Not Included |

Inbound: Havana - Miami Saturday, March 28, 2020

Show Details

| American Airlines | Departs | Arriving | Duration | |
|---|---|---|---|---|
| | Jose Marti Intl, Havana (HAV) 11:45 AM | Miami Intl, Miami (MIA) 12:55 PM | 01:10 Hours | Baggage Not Included |

Show Details

| American Airlines | Departs | Arriving | Duration | |
|---|---|---|---|---|
| | Jose Marti Intl, Havana (HAV) 12:50 PM | Miami Intl, Miami (MIA) 2:01 PM | 01:11 Hours | Baggage Not Included |

Fare Details | Alternative Fares | More Information | Pin | Select

American Airlines Average price per person (includes Taxes and carrier-imposed fees): **$ 533.75** Hide

Total fare (includes Taxes and carrier-imposed fees): : **$ 533.75**

**Outbound: Miami - Havana Saturday, March 21, 2020**

Show Details

| American Airlines | Departs | Arriving | Duration | |
|---|---|---|---|---|
| | Miami Intl, Miami (MIA) 6:48 AM | Jose Marti Intl, Havana (HAV) 8:05 AM | 01:17 Hours | Baggage Not Included |

**Inbound: Havana - Miami Saturday, March 28, 2020**

Show Details

| American Airlines | Departs | Arriving | Duration | |
|---|---|---|---|---|
| | Jose Marti Intl, Havana (HAV) 11:45 AM | Miami Intl, Miami (MIA) 12:55 PM | 01:10 Hours | Baggage Not Included |

Show Details

| American Airlines | Departs | Arriving | Duration | |
|---|---|---|---|---|
| | Jose Marti Intl, Havana (HAV) 12:50 PM | Miami Intl, Miami (MIA) 2:01 PM | 01:11 Hours | Baggage Not Included |

Fare Details | Alternative Fares | More Information | Pin | Select

American Airlines Average price per person (includes Taxes and carrier-imposed fees): **$ 542.75** Hide

Total fare (includes Taxes and carrier-imposed fees): : **$ 542.75**

**Outbound: Miami - Havana Saturday, March 21, 2020**

Show Details

| American Airlines | Departs | Arriving | Duration | |
|---|---|---|---|---|
| | Miami Intl, Miami (MIA) 3:41 PM | Jose Marti Intl, Havana (HAV) 4:55 PM | 01:14 Hours | Baggage Not Included |

Show Details

| American Airlines | Departs | Arriving | Duration | |
|---|---|---|---|---|
| | Miami Intl, Miami (MIA) 7:40 AM | Jose Marti Intl, Havana (HAV) 8:55 AM | 01:15 Hours | Baggage Not Included |

Show Details

| American Airlines | Departs | Arriving | Duration | |
|---|---|---|---|---|
| | Miami Intl, Miami (MIA) 6:55 PM | Jose Marti Intl, Havana (HAV) 8:10 PM | 01:15 Hours | Baggage Not Included |

Show Details

| American Airlines | Departs | Arriving | Duration | |
|---|---|---|---|---|
| | Miami Intl, Miami (MIA) 9:29 AM | Jose Marti Intl, Havana (HAV) 10:45 AM | 01:16 Hours | Baggage Not Included |

Show Details

| American Airlines | Departs | Arriving | Duration | |
|---|---|---|---|---|
| | Miami Intl, Miami (MIA) 10:31 AM | Jose Marti Intl, Havana (HAV) 11:50 AM | 01:19 Hours | Baggage Not Included |

**Inbound: Havana - Miami Saturday, March 28, 2020**

Show Details

| American Airlines | Departs | Arriving | Duration | |
|---|---|---|---|---|
| | Jose Marti Intl, Havana (HAV) 9:10 PM | Miami Intl, Miami (MIA) 10:21 PM | 01:11 Hours | Baggage Not Included |

Fare Details | Alternative Fares | More Information | Pin | Select

Prev | 1 | 2 | 3 | 4 | 5 | Next

5

# TAB 3

CUBA TRAVEL SERVICES

Home | Flight | Log in / Register | English | Spanish

Plan Your Trip > Check Out > Confirmation

◉ Round Trip ○ One Way ○ Multi-leg

| From | To | Departure Date | | Return Date | | |
|---|---|---|---|---|---|---|
| Miami, USA | Santa Clara, Cuba | 03/21/2020 | Anytime | 03/28/2020 | Anytime | Search |

Advanced Options

**Results Filter 7 result(s)**

Unselect all filters

- Price ($)
- Departure Hour
- Arrival Hour
- Connections ($)
- Airlines ($)
- Airports ($)
- Duration
- Booking Class
- Cabin Classes ($)
- Luggage ($)

Show Additional Filters

**Matrix**

All Flights

| Airline(MIA>SNU) / Stop(MIA>SNU) | Copa Airlines | Bahamasair | Avianca | Taca Intl Airlines |
|---|---|---|---|---|
| 1 Connection | $ 861.09 | - | - | - |
| 2 Connection(s) | - | $ 1,149.93 | $ 1,152.25 | $ 1,735.25 |

Minimum — Maximum

Sort from lowest to highest pric | +/- 3 days

## Miami, FL, USA to Santa Clara, Cuba

**Sat 21 Mar, Sat 28 Mar**

5 results out of 7

Multiple Airlines — Average price per person (includes Taxes and carrier-imposed fees): **$ 861.09** Hide

Total fare (includes Taxes and carrier-imposed fees): : **$ 861.09**

**Outbound: Miami - Santa Clara Saturday, March 21, 2020**

Show Details

| Copa Airlines | Departs | Arriving | Duration | |
|---|---|---|---|---|
| | Miami Intl, Miami (MIA) 6:03 PM | Abel Santamaria, Santa Clara (SNU) 12:02 PM | 1 Connection 17:59 Hours Next day arrival! | Baggage Included 1 Baggage ◉ |

Show Details

| Copa Airlines | Departs | Arriving | Duration | |
|---|---|---|---|---|
| | Miami Intl, Miami (MIA) 5:42 PM | Abel Santamaria, Santa Clara (SNU) 12:02 PM | 1 Connection 18:20 Hours Next day arrival! | Baggage Included 1 Baggage ○ |

Show Details

| Copa Airlines | Departs | Arriving | Duration | |
|---|---|---|---|---|
| | Miami Intl, Miami (MIA) 2:43 PM | Abel Santamaria, Santa Clara (SNU) 12:02 PM | 1 Connection 21:19 Hours Next day arrival! | Baggage Included 1 Baggage ○ |

Show Details

| Copa Airlines | Departs | Arriving | Duration | |
|---|---|---|---|---|
| | Miami Intl, Miami (MIA) 11:38 AM | Abel Santamaria, Santa Clara (SNU) 12:02 PM | 1 Connection | Baggage Included 1 Baggage ○ |

**Itinerary**

Your shopping basket is empty

**History (3)**

Miami - Havana
Sat 15 Feb
1 Adult

Havana - Miami
Sat 22 Feb
1 Adult

Miami - Santa Clara
Sat 15 Feb
1 Adult

Santa Clara - Miami
Sat 22 Feb
1 Adult

Miami - Santa Clara
Sat 21 Mar
1 Adult

Santa Clara - Miami
Sat 28 Mar
1 Adult

Clear Result

24:24 Hours Next day arrival!

Show Details

| | Departs | Arriving | Duration | |
|---|---|---|---|---|
| Copa Airlines | Miami Intl, Miami (MIA) 7:54 AM | Abel Santamaria, Santa Clara (SNU) 12:02 PM | 1 Connection 28:08 Hours Next day arrival! | Baggage Included 1 Baggage |

**Inbound: Santa Clara - Miami Saturday, March 28, 2020**

Show Details

| | Departs | Arriving | Duration | |
|---|---|---|---|---|
| Westjet | Abel Santamaria, Santa Clara (SNU) 2:20 PM | Miami Intl, Miami (MIA) 1:05 PM | 1 Connection 22:45 Hours Next day arrival! | Baggage Included 1 Baggage |

Fare Details | Alternative Fares | More Information | Pin | Select

Multiple Airlines Average price per person (includes Taxes and carrier-imposed fees): **$ 1,023.25** Hide

Total fare (includes Taxes and carrier-imposed fees): : **$ 1,023.25**

**Outbound: Miami - Santa Clara Saturday, March 21, 2020**

Show Details

| | Departs | Arriving | Duration | |
|---|---|---|---|---|
| Copa Airlines | Miami Intl, Miami (MIA) 6:03 PM | Abel Santamaria, Santa Clara (SNU) 12:02 PM | 1 Connection 17:59 Hours Next day arrival! | Baggage Included 1 Baggage |

Show Details

| | Departs | Arriving | Duration | |
|---|---|---|---|---|
| Copa Airlines | Miami Intl, Miami (MIA) 5:42 PM | Abel Santamaria, Santa Clara (SNU) 12:02 PM | 1 Connection 18:20 Hours Next day arrival! | Baggage Included 1 Baggage |

Show Details

| | Departs | Arriving | Duration | |
|---|---|---|---|---|
| Copa Airlines | Miami Intl, Miami (MIA) 2:43 PM | Abel Santamaria, Santa Clara (SNU) 12:02 PM | 1 Connection 21:19 Hours Next day arrival! | Baggage Included 1 Baggage |

Show Details

| | Departs | Arriving | Duration | |
|---|---|---|---|---|
| Copa Airlines | Miami Intl, Miami (MIA) 11:38 AM | Abel Santamaria, Santa Clara (SNU) 12:02 PM | 1 Connection 24:24 Hours Next day arrival! | Baggage Included 1 Baggage |

Show Details

| | Departs | Arriving | Duration | |
|---|---|---|---|---|
| Copa Airlines | Miami Intl, Miami (MIA) 7:54 AM | Abel Santamaria, Santa Clara (SNU) 12:02 PM | 1 Connection 28:08 Hours Next day arrival! | Baggage Included 1 Baggage |

**Inbound: Santa Clara - Miami Saturday, March 28, 2020**

Show Details

| | Departs | Arriving | Duration | | |
|---|---|---|---|---|---|
| Multiple Airlines | Abel Santamaria, Santa Clara (SNU) 1:02 PM | Miami Intl, Miami (MIA) 7:25 PM | 2 Connection (s) 30:23 Hours Next day arrival! | Operated by P5 AEROREPUBLICA , Operated by AVIANCA | Baggage Included 1 Baggage |

Fare Details | Alternative Fares | More Information | Pin | Select

Copa Airlines Average price per person (includes Taxes and carrier-imposed fees): **$ 1,025.25** Hide

Total fare (includes Taxes and carrier-imposed fees): : **$ 1,025.25**

**Outbound: Miami - Santa Clara Saturday, March 21, 2020**

| Airline | Departs | Arriving | Duration | Baggage |
|---|---|---|---|---|
| Copa Airlines | Miami Intl, Miami (MIA) 6:03 PM | Abel Santamaria, Santa Clara (SNU) 12:02 PM | 1 Connection 17:59 Hours Next day arrival! | Baggage Included 1 Baggage |
| Copa Airlines | Miami Intl, Miami (MIA) 5:42 PM | Abel Santamaria, Santa Clara (SNU) 12:02 PM | 1 Connection 18:20 Hours Next day arrival! | Baggage Included 1 Baggage |
| Copa Airlines | Miami Intl, Miami (MIA) 2:43 PM | Abel Santamaria, Santa Clara (SNU) 12:02 PM | 1 Connection 21:19 Hours Next day arrival! | Baggage Included 1 Baggage |
| Copa Airlines | Miami Intl, Miami (MIA) 11:38 AM | Abel Santamaria, Santa Clara (SNU) 12:02 PM | 1 Connection 24:24 Hours Next day arrival! | Baggage Included 1 Baggage |
| Copa Airlines | Miami Intl, Miami (MIA) 7:54 AM | Abel Santamaria, Santa Clara (SNU) 12:02 PM | 1 Connection 28:08 Hours Next day arrival! | Baggage Included 1 Baggage |

**Inbound: Santa Clara - Miami Saturday, March 28, 2020**

| Airline | Departs | Arriving | Duration | Baggage |
|---|---|---|---|---|
| Copa Airlines | Abel Santamaria, Santa Clara (SNU) 1:02 PM | Miami Intl, Miami (MIA) 11:19 PM | 1 Connection 10:17 Hours | Baggage Included 2 Baggage |
| Copa Airlines | Abel Santamaria, Santa Clara (SNU) 1:02 PM | Miami Intl, Miami (MIA) 1:55 AM | 1 Connection 12:53 Hours Next day arrival! | Baggage Included 2 Baggage |
| Copa Airlines | Abel Santamaria, Santa Clara (SNU) 1:02 PM | Miami Intl, Miami (MIA) 11:51 AM | 1 Connection 22:49 Hours Next day arrival! | Baggage Included 2 Baggage |
| Copa Airlines | Abel Santamaria, Santa Clara (SNU) 1:02 PM | Miami Intl, Miami (MIA) 1:17 PM | 1 Connection 24:15 Hours Next day arrival! | Baggage Included 2 Baggage |

| Copa Airlines | Departs | Arriving | Duration | |
|---|---|---|---|---|
| | Abel Santamaria, Santa Clara (SNU) 1:02 PM | Miami Intl, Miami (MIA) 4:22 PM | 1 Connection 27:20 Hours Next day arrival! | Baggage Included 2 Baggage |

Fare Details | Alternative Fares | More Information | Pin | Select

Multiple Airlines Average price per person (includes Taxes and carrier-imposed fees): **$ 1,149.93** Hide

Total fare (includes Taxes and carrier-imposed fees): : **$ 1,149.93**

**Outbound: Miami - Santa Clara Saturday, March 21, 2020**

Show Details

| Multiple Airlines | Departs | Arriving | Duration | |
|---|---|---|---|---|
| | Miami Intl, Miami (MIA) 8:40 AM | Abel Santamaria, Santa Clara (SNU) 12:02 PM | 2 Connection (s) 27:22 Hours Next day arrival! | Baggage Not Included |

**Inbound: Santa Clara - Miami Saturday, March 28, 2020**

Show Details

| Westjet | Departs | Arriving | Duration | |
|---|---|---|---|---|
| | Abel Santamaria, Santa Clara (SNU) 2:20 PM | Miami Intl, Miami (MIA) 1:05 PM | 1 Connection 22:45 Hours Next day arrival! | Baggage Not Included |

Fare Details | Alternative Fares | More Information | Pin | Select

Multiple Airlines Average price per person (includes Taxes and carrier-imposed fees): **$ 1,150.09** Hide

Total fare (includes Taxes and carrier-imposed fees): : **$ 1,150.09**

**Outbound: Miami - Santa Clara Saturday, March 21, 2020**

Show Details

| Multiple Airlines | Departs | Arriving | Duration | |
|---|---|---|---|---|
| | Miami Intl, Miami (MIA) 8:40 AM | Abel Santamaria, Santa Clara (SNU) 12:02 PM | 2 Connection (s) 27:22 Hours Next day arrival! | Baggage Not Included |

**Inbound: Santa Clara - Miami Saturday, March 28, 2020**

Show Details

| Multiple Airlines | Departs | Arriving | Duration | | |
|---|---|---|---|---|---|
| | Abel Santamaria, Santa Clara (SNU) 1:02 PM | Miami Intl, Miami (MIA) 7:25 PM | 2 Connection (s) 30:23 Hours Next day arrival! | Operated by P5 AEROREPUBLICA , Operated by AVIANCA | Baggage Not Included |

Fare Details | Alternative Fares | More Information | Pin | Select

Prev | 1 | 2 | Next

5

CUBA TRAVEL SERVICES

Home | Flight

Log in / Register | English | Spanish

Plan Your Trip > Check Out > Confirmation

Round Trip | One Way | Multi-leg

| From | To | Departure Date | | Return Date | | |
|---|---|---|---|---|---|---|
| Fort Lauderdale, US | Santa Clara, Cuba | 03/21/2020 | Anytime | 03/28/2020 | Anytime | Search |

Advanced Options

**Results Filter** 5 result(s)

Unselect all filters

- Price ($)
- Departure Hour
- Arrival Hour
- Connections ($)
- Airlines ($)
- Airports ($)
- Duration
- Booking Class
- Cabin Classes ($)
- Luggage ($)

Show Additional Filters

**Matrix**

All Flights

| Airline(FLL>SNU) / Stop(FLL>SNU) | Gulfstream International | Copa Airlines | United Airlines | Bahamasair |
|---|---|---|---|---|
| 1 Connection | - | $ 725.45 | - | - |
| 2 Connection(s) | $ 705.95 | - | $ 915.95 | $ 1,010.29 |

Minimum — Maximum

Sort from lowest to highest pric | +/- 3 days

## Fort Lauderdale, FL, USA to Santa Clara, Cuba

**Sat 21 Mar, Sat 28 Mar**

5 results out of 5

Multiple Airlines — Average price per person (includes Taxes and carrier-imposed fees): **$ 725.45** Hide

Total fare (includes Taxes and carrier-imposed fees): : **$ 725.45**

**Outbound: Fort Lauderdale - Santa Clara Saturday, March 21, 2020**

Show Details

| Copa Airlines | Departs | Arriving | Duration | |
|---|---|---|---|---|
| | Fll Intl, Fort Lauderdale (FLL) 6:07 PM | Abel Santamaria, Santa Clara (SNU) 12:02 PM | 1 Connection 17:55 Hours Next day arrival! | Baggage Included 1 Baggage |

**Inbound: Santa Clara - Fort Lauderdale Saturday, March 28, 2020**

Show Details

| Westjet | Departs | Arriving | Duration | |
|---|---|---|---|---|
| | Abel Santamaria, Santa Clara (SNU) 2:20 PM | Fll Intl, Fort Lauderdale (FLL) 11:03 AM | 1 Connection 20:43 Hours Next day arrival! | Baggage Included 1 Baggage |

Fare Details | Alternative Fares | More Information | Pin | Select

Multiple Airlines — Average price per person (includes Taxes and carrier-imposed fees): **$ 733.03** Hide

Total fare (includes Taxes and carrier-imposed fees): : **$ 733.03**

**Outbound: Fort Lauderdale - Santa Clara Saturday, March 21, 2020**

Show Details

| Departs | Arriving | Duration |
|---|---|---|

**Itinerary**

**Your shopping basket is empty**

**History (2)**

Fort Lauderdale - Havana
Sat 21 Mar
1 Adult

Havana - Fort Lauderdale
Sat 28 Mar
1 Adult

Fort Lauderdale - Santa Clara
Sat 21 Mar
1 Adult

Santa Clara - Fort Lauderdale
Sat 28 Mar
1 Adult

Clear Result

| | | | | |
|---|---|---|---|---|
| Copa Airlines | Fll Intl, Fort Lauderdale (FLL) 6:07 PM | Abel Santamaria, Santa Clara (SNU) 12:02 PM | 1 Connection 17:55 Hours Next day arrival! | Baggage Included 1 Baggage |

**Inbound: Santa Clara - Fort Lauderdale Saturday, March 28, 2020**

Show Details

| | Departs | Arriving | Duration | |
|---|---|---|---|---|
| Westjet | Abel Santamaria, Santa Clara (SNU) 2:20 PM | Fll Intl, Fort Lauderdale (FLL) 8:07 PM | 1 Connection 29:47 Hours Next day arrival! | Baggage Included 1 Baggage |

Fare Details | Alternative Fares | More Information | Pin | Select

Multiple Airlines — Average price per person (includes Taxes and carrier-imposed fees): **$ 757.76** Hide

Total fare (includes Taxes and carrier-imposed fees): : **$ 757.76**

**Outbound: Fort Lauderdale - Santa Clara Saturday, March 21, 2020**

Show Details

| | Departs | Arriving | Duration | |
|---|---|---|---|---|
| Copa Airlines | Fll Intl, Fort Lauderdale (FLL) 6:07 PM | Abel Santamaria, Santa Clara (SNU) 12:02 PM | 1 Connection 17:55 Hours Next day arrival! | Baggage Included 1 Baggage |

**Inbound: Santa Clara - Fort Lauderdale Saturday, March 28, 2020**

Show Details

| | Departs | Arriving | Duration | |
|---|---|---|---|---|
| Westjet | Abel Santamaria, Santa Clara (SNU) 2:20 PM | Fll Intl, Fort Lauderdale (FLL) 1:21 PM | 1 Connection 23:01 Hours Next day arrival! | Baggage Included 1 Baggage |

Fare Details | Alternative Fares | More Information | Pin | Select

Copa Airlines — Average price per person (includes Taxes and carrier-imposed fees): **$ 860.25** Hide

Total fare (includes Taxes and carrier-imposed fees): : **$ 860.25**

**Outbound: Fort Lauderdale - Santa Clara Saturday, March 21, 2020**

Show Details

| | Departs | Arriving | Duration | |
|---|---|---|---|---|
| Copa Airlines | Fll Intl, Fort Lauderdale (FLL) 6:07 PM | Abel Santamaria, Santa Clara (SNU) 12:02 PM | 1 Connection 17:55 Hours Next day arrival! | Baggage Included 1 Baggage |

**Inbound: Santa Clara - Fort Lauderdale Saturday, March 28, 2020**

Show Details

| | Departs | Arriving | Duration | |
|---|---|---|---|---|
| Copa Airlines | Abel Santamaria, Santa Clara (SNU) 1:02 PM | Fll Intl, Fort Lauderdale (FLL) 3:51 PM | 1 Connection 26:49 Hours Next day arrival! | Baggage Included 2 Baggage |

Fare Details | Alternative Fares | More Information | Pin | Select

Multiple Airlines — Average price per person (includes Taxes and carrier-imposed fees): **$ 1,128.51** Hide

Total fare (includes Taxes and carrier-imposed fees): : **$ 1,128.51**

**Outbound: Fort Lauderdale - Santa Clara Saturday, March 21, 2020**

Show Details

| | Departs | Arriving | Duration | |
|---|---|---|---|---|
| Copa Airlines | Fll Intl, Fort Lauderdale (FLL) | Abel Santamaria, Santa Clara (SNU) | 1 Connection | Baggage Included |

| | | | | |
|---|---|---|---|---|
| | 6:07 PM | 12:02 PM | 17:55 Hours Next day arrival! | 1 Baggage |

**Inbound: Santa Clara - Fort Lauderdale Saturday, March 28, 2020**

Show Details

| Multiple Airlines | Departs | Arriving | Duration | |
|---|---|---|---|---|
| | Abel Santamaria, Santa Clara (SNU) 1:02 PM | Fll Intl, Fort Lauderdale (FLL) 9:00 AM | 2 Connection (s) 43:58 Hours Next day arrival! | Baggage Included 2 Baggage |

Show Details

| Multiple Airlines | Departs | Arriving | Duration | |
|---|---|---|---|---|
| | Abel Santamaria, Santa Clara (SNU) 1:02 PM | Fll Intl, Fort Lauderdale (FLL) 2:05 PM | 2 Connection (s) 49:03 Hours Next day arrival! | Baggage Included 2 Baggage |

Fare Details | Alternative Fares | More Information | Pin

Select

Prev 1 Next

5

**Certificate of Service**

I hereby certify that on February 19, 2020, pursuant to Show Cause Order 2020-1-16, a copy of the Answer of ViajeHoy Charters, LLC, d/b/a Havana Air to the various filings filed February 12 was served via email on the persons listed below.

Addison P. Weinreb

| | |
|---|---|
| Jason E. Maddux (Aerocuba, Cubazul) | jmaddux@ggh-airlaw.com |
| Robert Wirick (American Airlines) | robert.wirick@aa.com |
| John Williams (American Airlines) | john.b.williams@aa.com |
| John R. Mietus, Jr. (Caribbean Sun d/b/a WAA) | john@mietuslaw.com |
| Alex Krulic (Delta) | alex.Krulic@delta.com |
| Christopher Walker (Delta) | chirs.walker@delta.com |
| Steven Seiden (Delta) | steven.seiden@delta.com |
| Robert Land (JetBlue) | robert.land@jetblue.com |
| Reese Davidson (JetBlue) | reese.davidson@jetblue.com |
| Evelyn Sahr (JetBlue) | esahr@eckertseamans.com |
| Drew Derco (Jetblue) | dderco@eckertseaman.com |
| Leslie Abbott (Southwest) | leslie.abbott@wnco.com |
| Robert Kneisley (Southwest) | bob.kneisley@wnco.com |
| Parker J. Erkmann (Swift Air) | perkmann@cooley.com |
| Julia Brinton (Swift Air) | jbrinton@cooley.com |
| Abby Bried (United Airlines) | abried@jenner.com |
| Steve Morrissey (United Airlines) | steve.morrissey@united.com |
| Dan Weiss (United Airlines) | dan.weiss@united.com |
| Amna Arshad (United Airlines) | amna.arshad@freshfields.com |
| Josh Romanow (Xael Charter) | romanow@pillsburylaw.com |
| Brett Kruger (DOT) | brett.kruger@dot.gov |