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VIA REGULATIONS.GOV & EMAIL

February 20, 2020

Brett Kruger
Chief, Air Carrier Fitness Division
Department of Transportation
1200 New Jersey Ave., SE
Room W86-320
Washington, DC 20590

Re: U.S.-Havana Public Charter Allocation, Docket OST-2020-0011

Dear Mr. Kruger:

Having reviewed the Answers submitted in this docket, Swift Air, LLC ("Swift") submits this letter to confirm that it will not respond substantively to any of yesterday's pleadings.¹ Swift respectfully submits that the public interest would be served by the Department issuing a Final Order promptly and consistent with its stated goal of issuing it in February.² Time is of the essence. With the suspension of flights to airports outside of Havana going into effect in less than three weeks and continued ambiguity about the operating environment going forward, Swift and its customers face significant uncertainty. The uncertainty is already causing operational difficulties for Swift in the Cuba market as well as in its other operations:

- Because Swift pilots and flight attendants submit bids for schedules 30 days in advance, the uncertainty has required Swift to use a substantial amount of guesswork in scheduling crews out of its Miami base.
- While Swift has received requests for service from other customers in other markets, Swift does not know how many aircraft will be required to serve the Cuban market during the rest of 2020, putting potential revenue at risk.
- Planning fleet maintenance to avoid having aircraft out of service during peak times and flowing aircraft back into the operation smoothly has proven impossible for March, April, and May as Swift heads into its busiest operating season.

Accordingly, Swift respectfully requests that the Final Order be issued promptly and with sufficient clarity about the rights awarded to charter carriers during the upcoming charter year so that charter carriers can continue to operate with regular services typical of the Cuba market.

¹ To the extent required, Swift requests leave to file an otherwise unauthorized document pursuant to 14 CFR § 302.6.

² See Order 2020-1-16 at 2 n.3.



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Respectfully submitted,

A handwritten signature in black ink, reading "Parker Erkmann". The signature is written in a cursive, flowing style. Below the signature is a solid black horizontal line.

Parker Erkmann
Counsel for Swift Air, LLC

CERTIFICATE OF SERVICE

I hereby certify that a copy of this correspondence of Swift Air, LLC was served this 20th day of February, 2020 via email transmission on the following:

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/s/ Julia Brinton
Julia Brinton