

BEFORE THE
DEPARTMENT OF TRANSPORTATION
WASHINGTON, D.C.

_____)	
U.S.-HAVANA PUBLIC CHARTER)	DOCKET OST-2020-0011
AUTHORIZATIONS)	
_____)	

ANSWER OF CARIBBEAN SUN AIRLINES, INC.
d/b/a WORLD ATLANTIC AIRLINES

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AIRLINES, INC. d/b/a WORLD
ATLANTIC AIRLINES

August 18, 2020

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By application dated August 11, 2020 in the above-captioned docket, Allegiant Air, LLC requested the distribution of 205 charters from the U.S.-Havana public charter pool. Caribbean Sun Airlines, Inc. d/b/a World Atlantic Airlines ("WAA") objects to Allegiant's application. WAA's concern is not with Allegiant. Rather, it is with the proposed charter operator, Anmart Superior Travel LLC ("Superior"). WAA respectfully submits that Allegiant's request to fly for Superior is not in the public interest and should be rejected.

Superior stumbled badly in attempting its first Cuba charter program. Havana Air's February 12, 2020 objections in the above-captioned docket described the first-day collapse of Superior's 2019 program and the resultant stranding of passengers. WAA, which was to have flown for Superior under prospectus PC-19-147, concluded during this year's charter allocation proceeding that it could no longer support Superior's attempts to begin Cuba charters.

After allocating Havana charters in Order 2020-5-7, the Department opened 10% of the available annual charters to pool requests. No carrier proposed in that first pool round to conduct an operation for Superior. As it was, the 10% pool was not sufficient to satisfy the full requests of any carriers or charter operators in that first round.

What's available today is a pool refilled by charters returned because Cuba continues to prohibit Havana charters during the COVID-19 crisis. The carriers and operators making these returns have already requested reallocation of the meager COVID return pool to reprogram what will remain of the charter year. And only now does Superior, newly doing business as Anmart Air, reappear with what must be considered a speculative proposal to re-attempt Cuba service. In the unusual (and hopefully time-limited) circumstances posed by this year's COVID return pool, the Department's priority should be to maintain access to charters for the carriers and operators it has already selected for the first charter year.

Accordingly, World Atlantic Airlines respectfully urges the
Department to deny Allegiant Air's application.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "John R. Mietus, Jr.", written in a cursive style.

John R. Mietus, Jr.
Counsel for CARIBBEAN SUN
AIRLINES, INC. d/b/a WORLD
ATLANTIC AIRLINES

August 18, 2020

CERTIFICATE OF SERVICE

I certify that a copy of this letter was served by email this 18th day of August, 2020, on the following persons:

Aerocuba, Cubazul,
Havana Air
Allegiant Air
American
Cuba Travel Services
Delta
Invicta
JetBlue
Southwest
Anmart Superior Travel
United
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A handwritten signature in black ink, appearing to read "John R. Mietus, Jr.", with a stylized, cursive script.

John R. Mietus, Jr.