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April 13, 2020

The Honorable Joel Szabat
Assistant Secretary for Aviation and International Affairs
U.S. Department of Transportation
1200 New Jersey Avenue, SE Washington, D.C. 20590
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RE: DOCKET DOT-OST-2020-0037

Hon. ASAIA Szabat:

I write to you as legal counsel for, and to express the opinion of, the Green Bay Austin Straubel International Airport (GRB), its Airport Director, Marty Piette, and the County of Brown regarding the United Airways Request for Exemption from Service Obligations.

On April 12, 2020 United Airlines filed a Request for Exemption from Service Obligations, which, if approved by the DOT, would negatively affect Green Bay, Wisconsin's (GRB) level of air service. Brown County, as owner and operator of GRB, respectfully submits its objection to United Airline's Request. The objection is as follows:

1. Of the 6 city pairs identified in Paragraph E, United Airlines is requesting to retain service at the airport that carries more traffic than its counterpart to the hub, with the sole exception of Green Bay. Green Bay historically carries more passengers to the nation's second largest hub, Chicago O'Hare (ORD) on American Airlines and United Airlines, than does Appleton.
 - In 2018 GRB carried 252,946 round-trip onboard passengers to ORD compared to ATW with 204,460
 - In 2019 GRB carried 264,452 round-trip onboard passengers to ORD compared to ATW with 215,325
2. Green Bay's load factor (percentage of seated sold) to ORD on American Airlines and United Airlines is historically higher than Appleton.
 - In 2018 GRB's ORD round-trip load factor was 74.6% compared to 73.9% for ATW
 - In 2019 GRB's ORD round-trip load factor was 79.6% compared to 79.5% for ATW

3. Green Bay carries more local traffic to and from ORD on American Airlines and United Airlines than Appleton, some quarters as much as twice as many passengers.
 - In 2018 GRB carried 14,412 round-trip onboard passengers to ORD compared to ATW with 8,231
 - In 2019 GRB carried 20,004 round-trip onboard passengers to ORD compared to ATW with 12,905
4. For the month of April 2020, American Airlines, which only recently began serving Appleton (Summer 2017), has cancelled very few flights out of Appleton but removed approximately two per day in Green Bay. If United Airlines were to cease Green Bay flights, Green Bay would be left with perhaps one flight per day to ORD, on American Airlines.
 - GRB originally had 288 departures planned before the crisis and now has seen 120 cancellations as of April 12.
 - ATW originally had 239 departures planned before the crisis and now has seen 69 cancellations as of April 12.
5. Transportation Security Administration screening data shows that on most days since the dramatic decline in passengers in mid-March, Green Bay still screens more people than Appleton.

Given these facts, and based on historical passenger data, TSA screening data, and available future flight scheduling data, allowing United Airlines to terminate service in Green Bay would favor the airport that has less passengers to and from ORD, thereby disproportionately impacting Green Bay's ability to provide viable air service to the region. For these reasons, Brown County respectfully reiterates its objection to United Airlines Request for Exemption from Service Obligations.

Very Truly Yours,



David P. Hemery, Brown County Corporation Counsel
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