

BEFORE THE
DEPARTMENT OF TRANSPORTATION
WASHINGTON, D.C.

Application of

UNITED AIRLINES, INC.

for allocation of seven (7) weekly Fifth Freedom
Combination Frequencies (Hong Kong-Singapore)

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Docket DOT-OST-2020-_____

APPLICATION OF
UNITED AIRLINES, INC.
FOR ALLOCATION OF FREQUENCIES

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Counsel for
United Airlines, Inc.

May 5, 2020

NOTICE: United is requesting expedited treatment of this application. United will poll carrier representatives on the attached service list and advise the Department of the results.

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United¹ applies, pursuant to Subpart C of 14 C.F.R. Part 302 of the Department’s Rules of Practice and the October 19, 2002, Memorandum of Understanding between the United States and Hong Kong (“U.S. – Hong Kong MOU”), for allocation of seven weekly Fifth Freedom combination frequencies to permit United to provide foreign air transportation of persons, property and mail between Hong Kong and Singapore. United first plans to launch cargo-only service starting on May 10, 2020, using B777-300 aircraft from its existing fleet, provided all necessary approvals have been secured.

1. United intends to start U.S. – Hong Kong – Singapore cargo-only service with its passenger aircraft.² The flights will transport U.S. – Singapore third and fourth freedom traffic, U.S. – Hong Kong third and fourth freedom traffic, and once authorized, Hong Kong – Singapore fifth freedom

² Depending upon the rebound in passenger traffic, United may commence passenger service at a future date.

traffic. United seeks allocation of fifth freedom frequencies on an unlimited basis and, should United cease the service, it will promptly return the frequencies to the pool for reallocation.

2. Allocation of these frequencies to United is in the public interest as United's proposed service will provide additional cargo capacity to the region. United urges the Department to act promptly on this application so that it can secure foreign authority and make final operating plans in advance of operations, which United plans to commence on May 10, 2020.

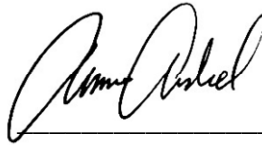
3. The requested authority is fully consistent with the U.S. – Hong Kong MOU and the U.S. – Singapore Agreement. United understands that there are available weekly combination frequencies in the slot pool to satisfy United's request.

4. United holds various certificates of public convenience and necessity and exemptions authorizing it to engage in scheduled air transportation of persons, property, and mail between the U.S. and foreign countries, and United is fit, willing, and able to provide the service for which it seeks authority. *See, e.g.*, Orders 2013-4-11 (reissuing United/Continental authorities to United), 2011-3-14 (United/Continental route transfer), 2007-4-19 (Blanket Open Skies), and Notice of Action Taken dated May 14, 2019, in Docket DOT-OST-2004-19148 (blanket worldwide codesharing). United requests that the Department take official notice, pursuant to Rule 24 of its Rules of Practice (14 CFR Part 302), of all data filed to establish United's fitness. United will continue to conduct its operations in accordance with the terms and conditions of its authority, as well as with all applicable international agreements.

5. Grant of the requested authority will not cause a near-term net annual change in United's aircraft fuel consumption of 10 million gallons or more and will not, therefore, constitute a major regulatory action under Part 313 of the Department's Procedural Regulations.

WHEREFORE, United respectfully requests that the Department promptly grant this application for frequency allocation and such other relief the Department may deem necessary or appropriate.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'Amna Arshad', is written over a horizontal line.

Amna Arshad
Freshfields Bruckhaus Deringer US LLP

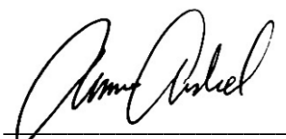
Counsel for United Airlines, Inc.

May 5, 2020

CERTIFICATE OF SERVICE

I certify that I have this date served the foregoing document on the following persons by causing a copy to be sent electronically in accordance with the Department's Rules of Practice:

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May 5, 2020