

**BEFORE THE
DEPARTMENT OF TRANSPORTATION
WASHINGTON, D.C.**

Application of)	
)	
DELTA AIR LINES, INC.)	
)	
in the matter of the 2024 Ronald Reagan)	Docket DOT-OST-2024-0065
Washington National Airport Slot Exemption)	
Proceeding)	
)	

COMMENTS OF DELTA AIR LINES, INC.

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July 17, 2024

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Delta¹ has submitted a competition-driven proposal to provide new nonstop service between Ronald Reagan Washington National Airport (DCA) and Seattle Tacoma International Airport (SEA) that decisively meets the statutory objectives of the Federal Aviation Administration Reauthorization Act of 2024 (“FAA Act”) by enhancing consumer choice and jumpstarting competition on a nonstop route that sorely needs it. An award of two slot exemptions to Delta to fund its new SEA flight will inject first-ever competition on a key transcontinental route from DCA that swells with demand but suffers from inadequate single-carrier service. Delta is the only applicant in this proceeding poised to introduce competition to Alaska’s uncontested nonstop beyond perimeter flights to the Pacific Northwest and is one of just two non-limited incumbent carriers at DCA that have demonstrated a genuine commitment to advancing the core objectives enshrined in Section 502 of the FAA Act (with Southwest’s DCA-Las Vegas proposal featuring similar pro-competitive attributes).

In stark contrast, the remaining three non-limited incumbent applicants – United, JetBlue, and American – have submitted inferior, uncompetitive service proposals that do not warrant selection over Delta’s proposed SEA flight.

- **United**, the carrier that was so fervently opposed to the prospect of new competitive service options at Washington, D.C.’s premier airport that it spent millions of dollars

¹ Common names are used for airlines.

and vast amounts of political capital to excise any provisions in the FAA Act and predecessor FAA Reauthorization bills that would authorize new DCA flights, has abruptly reversed course, proposing a beyond perimeter destination in San Francisco that United already serves nonstop from DCA. United's election to use a scarce public asset to double down on a beyond perimeter destination that it already serves – and that already has healthy competition (from Alaska) – underscores United's aversion to meaningful competition at the Washington, D.C. area airports. Most importantly, United's proposal is not consistent with either the letter or spirit of Section 502 of the FAA Act because it doesn't enhance competition.

- **JetBlue's** proposal doesn't enhance competition, either. JetBlue has proposed a beyond perimeter destination in San Juan that JetBlue – and only JetBlue – already serves. JetBlue's DCA-SJU proposal neither serves a new market nor enhances competition in any meaningful way, as JetBlue would be merely supplementing its existing service on the uncontested and small DCA-SJU route. Nor is the enhanced time channel coverage about which JetBlue boasts either compelling or responsive to the applicable statutory criteria. Like United's proposal, JetBlue's proposal does not meet the objectives of the FAA Act and is clearly inferior to Delta's.
- **American**, despite boasting 60% of the overall flights at DCA and 30% of the airport's beyond perimeter flights, claims it needs an *additional* slot-pair from the Department to fund its new nonstop flight to San Antonio. While DCA-SAT is an unserved market that clearly meets one of the two selection criteria in the FAA Act, American does not need more beyond-perimeter slots to serve SAT. American can – and, if it earnestly wishes to serve SAT, should – spare one of the two flexible beyond perimeter slot-pairs it currently uses to fund double daily DCA-LAX service and reallocate it to SAT. American, in contrast to other applicants, could do so without even sacrificing a point on its DCA route map, as it could maintain daily LAX service with its other flexible slot-

pair. Given American's dominant position at DCA and its surplus of flexible beyond perimeter slot-pairs, awarding an additional slot-pair to American at the expense of Delta's pro-competitive SEA proposal would subvert the FAA Act.

Were the Department to select any of those three proposals to the exclusion of Delta's, such a decision would flout both the letter and spirit of the FAA Act. Far from enhancing the competitive landscape at DCA, denial of Delta's application would harm competition by tilting nonstop DCA-SFO competition heavily in favor of United, fortifying JetBlue's uncontested service on a small route with questionable demand, increasing American's concentration at DCA, and depriving the traveling public of the substantial competitive benefits that will flow from Delta's new nonstop DCA service to SEA – a market that has long been captive to Alaska's uncontested double-daily service.

In contrast to United's and JetBlue's lackluster proposals, which fail to meet either of the required criterion in Section 502 of the FAA Act, and American's superfluous proposal, which meets the first applicable criterion but is based on a false premise that American needs an additional slot-pair from the Department to provide nonstop service to SAT,² Delta's DCA-SEA proposal would fulfill Congressional intent by introducing needed competition on a nonstop route that lacks it entirely. As Delta highlighted in its application, the Department should select Delta's DCA-SEA service proposal because it will:

- Inject nonstop competition against Alaska's double-daily DCA-SEA service;
- Increase seat capacity and exert downward fare pressure on the critical DCA-SEA route;
- Serve unmet demand from air travelers in the large Washington, D.C.-Seattle market, who strongly prefer close-in, convenient DCA over IAD;
- Better connect the large local population and burgeoning business community in Seattle to Washington, D.C.'s premier airport;

² Exhibit DL-C-101.

- Unlock new, competitive nonstop DCA service to the Pacific Northwest – an underserved region from DCA that is captive to Alaska’s beyond perimeter nonstop service to Portland and Seattle; and
- Enable customers to experience Delta’s industry-leading operational performance and customer service, elevated product offerings, and modern, fuel efficient A321neo aircraft.

Delta’s DCA-SEA proposal continues to attract support from key stakeholders. Additional support letters from various elected officials, labor groups, businesses, and organizations are attached at Appendix A.

I. Delta’s DCA-SEA Proposal Meets the Statutory Criteria and is Clearly Superior to Multiple Competing Proposals.

As Delta detailed in its application, its new nonstop DCA-SEA flight will enhance competition and consumer choice by serving the largest beyond-perimeter destination lacking competitive DCA service, exerting downward pressure on fares, and saving passengers’ time. Air travelers between the Washingtons deserve a competitive alternative to Alaska’s single-carrier double-daily nonstop service between DCA and SEA but, currently, they must choose between Alaska’s DCA-SEA service, nonstop service to distant Dulles or BWI airports, or connecting options over various carriers’ interior U.S. hubs. Awarding two slot exemptions to Delta for DCA-SEA service will create healthy competition in a market controlled by Alaska and will increase the options available to the traveling public, which is precisely what Congress envisioned when it finalized Section 502 of the FAA Act.

The Department need not overcomplicate its competitive effects analysis in this proceeding. When evaluating competing proposals for slot exemptions, the FAA Act directs the Secretary to consider, in pertinent part, the extent to which the carriers’ use of the slot exemptions will “have a positive impact on the overall level of competition in the markets that will be served as a result of those exemptions.”³ In contrast to the applications submitted by United and JetBlue – both of which propose redundant supplemental service – Delta’s proposed DCA-SEA nonstop

³ FAA Act, Sec. 502(a)(i)(4)(B).

flight will provide an immediate and sustainable infusion of competition on a large nonstop city-pair route that features strong demand yet is served nonstop exclusively and inadequately by Alaska.

Delta's proposed daily roundtrip service between DCA and SEA will also enhance inter-carrier network competition from DCA. Delta is at a structural disadvantage for DCA-western U.S. service because, with only two beyond-perimeter DCA slot pairs, Delta is presently unable to serve DCA from all three of its western U.S. hubs; Delta operates flights from DCA to Los Angeles (LAX) and Salt Lake City (SLC), but not to SEA. American and Alaska, however, serve DCA from all their western hubs – giving them a significant competitive edge.

Failure to select Delta's proposal would harm competition and consumer choice by protecting Alaska's uncontested nonstop flight between DCA and SEA, depriving travelers in this market of a meaningful competitive alternative. The Department would also be squandering a rare opportunity to provide enhanced capacity to Seattle with Delta's modern, fuel efficient 194-seat Airbus A321neo aircraft, and to enable more customers to experience Delta's superior products, services, operational reliability, and culture. As detailed below, the competing applications underscore why Delta's DCA-SEA proposal merits selection.

II. The Department Should Ground United for Both its Anticompetitive Behavior and its Uncompetitive Application.

United's aversion to consumer choice and robust competition in the Washington, D.C. area was on full display between June 2023 and May 2024,⁴ and it is now on full display in its application. Rather than propose a new nonstop flight from DCA to an unserved destination, as encouraged by the first criterion in Section 502 of the FAA Act, or a new nonstop flight to challenge

⁴ Details concerning United's efforts to oppose new flights at DCA are well known and have been chronicled extensively in the media. See, e.g., Kate Ackley, *United Coordinated with Senators, Lobbyists to Undercut Delta*, Bloomberg Government (May 1, 2024), available at <https://news.bgov.com/bloomberg-government-news/united-coordinated-with-senators-lobbyists-to-derail-dc-flights>. See also U.S. Senate Committee on Commerce, Science, and Transportation, Press Releases, *Sen. Cruz Probes Attempts to Extort Millions from Airlines Over New DC Flights*, available at <https://www.commerce.senate.gov/2023/12/sen-cruz-probes-attempts-to-extort-millions-from-airlines-over-new-dc-flights>.

an incumbent in an uncontested single-carrier market, as envisaged by the second criterion, United elected to double down on its DCA-SFO service, and, as a backup, enter the competitive fray in an LAX market that already benefits from a healthy mix of competition. The Department should reject United's proposals or, alternatively, relegate them below Delta's in the decisional hierarchy.

After spending many months and millions of dollars on a campaign to suppress competition in the Washington, D.C. area, United now claims it is poised to enhance competition with a redundant flight to San Francisco – urging the Department to afford United the “opportunity to compete against airlines that have a much larger operation at DCA (e.g., American)” and to “compete against airlines that have a larger presence between DCA and California and the West Coast (e.g., American and Alaska).”⁵ United would have the Department ignore that it unleashed a protectionist lobbying effort to kill the provisions in the FAA Act that would add incremental DCA flights, repeatedly and falsely claiming that such flights would adversely impact United's hub network at IAD, cause congestion, and, worse, endanger safety at DCA. United now reprises its deceptive political tactics with a duplicative, self-serving proposal for DCA-SFO service that in no way enhances competition and therefore fails under the applicable statutory criteria.

United's first-priority DCA-SFO proposal does not meet either of the two statutory criteria that Congress directed the Department to evaluate in this proceeding; San Francisco is neither a market that currently lacks service from DCA, nor a market where a United award would enhance competition. Despite repeatedly characterizing its proposals as pro-competitive, United's competition argument is shallow. United barely touches on the competitive attributes of SFO and LAX or how these routes satisfy the statutory standard. Instead, United devotes the majority of its DCA-SFO competition argument to describing tangential attributes such as the ability of a

⁵ United Application in this docket dated July 8, 2024 (“United Application”) at 7.

second SFO flight to enhance “schedule utility” and “connectivity”⁶ – neither of which are express statutory objectives in the FAA Act.⁷

United’s cursory competition argument for San Francisco – which covers less than a page of United’s filing – is that American is far bigger than United at DCA overall, and that American and Alaska are far bigger than United in the DCA-California market.⁸ This assertion, alone, is insufficient to justify selection of United’s proposal. United’s disadvantage at DCA, while accurate, doesn’t distinguish United from any other eligible carrier participating in this proceeding (other than American). Delta, JetBlue, Southwest, and, yes, United, all have far smaller footprints than American at DCA, just as they have smaller footprints than American and Alaska in beyond perimeter markets. What makes United’s SFO proposal inferior to Delta’s (and Southwest’s) is United’s singular focus on the macro-competitive environment at DCA as opposed to the more relevant micro-competitive environment. If United is successful in securing an additional slot-pair in this proceeding, its share at DCA, which is approximately 6%, will remain at approximately 6%. American will continue to hold the lion’s share of slots at DCA (approximately 60%), and American and Alaska will continue to hold approximately half of the beyond perimeter flying rights, regardless of whether their respective SAT and SAN proposals are selected. The competitive metric that matters most in this case is *city-pair* competition, and on that key factor, United’s proposal fails.

With competition defined at the city-pair level, United’s SFO application is clearly inferior to Delta’s. The DCA-SFO route already features healthy competition (from Alaska). Another United DCA-SFO flight would weaken the competitive balance on the route, boosting United’s operational share from 50% to 67% and reducing Alaska’s share to 33%. Exhibit DL-C-201. By

⁶ United Application at 13, 15.

⁷ Even if United’s connectivity argument were responsive to the statute, the argument would not withstand factual scrutiny. United can more efficiently connect most of the beyond-hub west coast destinations identified in its application over Denver (DEN) or Chicago (ORD) compared to SFO. Exhibit DL-C-202. In fact, of the 16 domestic markets United would newly connect via a second DCA-SFO frequency, only Burbank (BUR) would more efficiently connect over SFO compared to DEN/ORD. Exhibit DL-C-203.

⁸ United Application at 13.

contrast, a new Delta DCA-SEA flight would strengthen the competitive balance on the route, increasing Delta's operational share on the route from 0% to 33%, with Alaska's share reduced from 100% to 67%. Whereas United proposes to supplement its own service on a route that already has competition, Delta proposes to introduce new competition on a route that lacks it and sorely needs it. A slot award to United over Delta to fund a route that United already serves would run counter to the competitive principles in the FAA Act.

United's second-priority Los Angeles proposal is only marginally stronger on the competitive merits. LAX is already served by three airlines – more than any other beyond perimeter destination – and creating a fourth competitor on this route will not meaningfully enhance competition relative to Delta's proposal. Exhibit DL-C-204. Though United does not serve LAX nonstop from DCA, United's entry into that nonstop market would hardly move the competitive needle, as Los Angeles already enjoys four nonstop flights from DCA each day. American, Delta, and Alaska already serve DCA-LAX, and American serves it twice daily. In any case, given the competitive nature of and limited opportunities available in this proceeding, the Department, as a matter of principle, should not award any carrier's second choice over another carrier's first choice.

The deficiencies of United's application are the natural outgrowth of an awkward, hasty transition from hostile DCA opponent to opportunistic DCA proponent. It is no secret that United funded a multi-million dollar protectionist campaign to quash the efforts of Delta and other key stakeholders to enhance competition and consumer choice at DCA.⁹ United perceived the prospect of Congress authorizing new flights at DCA as a threat to its competitive advantage in the local market, hence the panic when a Delta-led coalition named the Capital Access Alliance

⁹ See supra note 4.

(CAA) initiated advocacy to expand access and enhance competition and consumer choice at DCA.¹⁰

Contrary to United's proffered concerns about the adverse effects of additional DCA flying on congestion and safety,¹¹ United's motives in opposing expanded DCA flying were parochial: because United controls nearly 70% of the gates and flights at IAD, the prospect of Congress unlocking more competitive nonstop beyond perimeter routes at DCA jeopardized United's commanding position and pricing power at IAD, where United is able to add medium- and long-haul flights without an antiquated perimeter rule, prompting United to mobilize a vast array of political assets to protect its IAD fortress hub. United's opposition to additional DCA flights was so forceful that the Ranking Member of the U.S. Senate Commerce Committee and a key champion of the FAA Act, Senator Ted Cruz, felt compelled to remark as follows during a debate on an FAA Act predecessor bill that included additional DCA slot exemptions:

"I would note the most voracious opposition to this amendment comes from lobbying on behalf of United Airlines. And the reason is not complicated to ascertain. United has a near monopoly position at Dulles Airport. And United understandably wants to preserve its monopoly profits."¹²

United's scare tactics were ultimately unsuccessful, as the will of Congress and Washington, D.C. air travelers prevailed when new DCA slots were made available in the FAA Act. But United's past anticompetitive behavior is nonetheless relevant in this proceeding, as it helps explain the uncompetitive nature of its application. In the interest of honoring the core objectives of the FAA Act, and for sake of competition, the Department should grant Delta's DCA-SEA proposal before considering selection of either of United's proposals.

¹⁰ See, e.g., Capital Access Alliance, *Capital Access Alliance Releases New Video Highlighting United Airlines' Support for More DCA Flights*, available at <https://capitalaccessalliance.com/capital-access-alliance-releases-new-video-highlighting-united-airlines-support-for-more-dca-flights/>.

¹¹ See *id.*

¹² Senate Floor Remarks of Senator Ted Cruz (May 9, 2024), clip available at <https://capitalaccessalliance.com/capital-access-alliance-releases-new-video-highlighting-united-airlines-support-for-more-dca-flights/>.

III. JetBlue's Proposal is Duplicative of its Existing San Juan Service and Does Not Enhance Competition.

Like United's SFO proposal, JetBlue's first-priority proposal to launch a redundant, second-daily flight to an existing DCA nonstop destination in San Juan, a single-carrier market served only by JetBlue, fails the statutory test because it would not enhance competition in any meaningful way. Instead of proposing a flight to a new beyond perimeter destination in furtherance of the first FAA Act criterion or, alternatively, a flight to a destination that is served exclusively by another carrier in furtherance of the second FAA Act criterion (as Delta has done), JetBlue has elected to supplement its uncontested DCA-SJU flight. Far from enhancing competition, JetBlue's SJU proposal seeks insulation from it.

Though JetBlue's SJU proposal has some value, the reality is SJU is a small market that is already and exclusively served by JetBlue. In fact, with just 293 passengers per day each way (PDEW), SJU is the smallest existing DCA beyond perimeter market. Exhibit DL-C-301. It is also the DCA beyond perimeter single-carrier market least in need of additional service based on a comparison of seat supply versus local demand. Whereas demand exceeds supply on Delta's proposed DCA-SEA route by 311 PDEW, demand exceeds supply on JetBlue's proposed DCA-SJU route by only 41 PDEW. Exhibit DL-C-302. Like United's proposal, JetBlue's does not meet either of the two applicable objectives in Section 502 of the FAA Act.

JetBlue's application is unconvincing for other reasons. In support of its proposal, JetBlue gushes about the "JetBlue Effect" and "conservatively projects" an average fare decrease of over 30% on the DCA-SJU route if JetBlue is awarded a pair of slot exemptions to launch a second-daily DCA-SJU flight.¹³ The flaw with this assertion is that JetBlue – and only JetBlue – sets fare levels on the DCA-SJU route, as JetBlue is the only air carrier who currently serves this nonstop route. Perhaps if JetBlue were proposing service on a different nonstop route already served by one or more competitors, citing the JetBlue Effect would be more persuasive. But by citing the

¹³ Application of JetBlue in this docket dated July 8, 2024 ("JetBlue Application") at 3.

JetBlue Effect in an application to supplement its own service, JetBlue is asking the Department to help JetBlue discipline its own pricing between DCA and SJU. This argument doesn't pass a pressure test.

JetBlue's backup service proposal for Los Angeles is perfunctory. The fact that JetBlue relegated its LAX proposal to its second choice and exiled it to a footnote on page 22 of its application¹⁴ speaks volumes for JetBlue's (lack of) commitment to this route specifically or to enhancing competition by virtue of the newly available slot exemption opportunities at DCA more broadly. Even if JetBlue's bid for LAX had been more than a footnote in its application, LAX already has three-carrier nonstop competition and four daily nonstop flights, the most of any DCA beyond-perimeter market. Exhibit DL-C-204. The Department would achieve more public benefits by selecting Delta's proposal and, therefore, must de-prioritize JetBlue's proposal.

IV. American's DCA-San Antonio Proposal Clearly Meets the Statutory Criteria, But American Should Self-Fund This Flight with a Slot-Pair from its Abundant DCA Portfolio.

American proposes a new nonstop flight to San Antonio (SAT) – the second largest unserved market from DCA – but would have the Department ignore that American operates 60% of the flights at slot-controlled DCA and controls 30% of the beyond perimeter slot pairs, two of which are flexible. Exhibit DL-C-401. Though American would undoubtedly prefer to secure an additional pair of slot exemptions to fund its new SAT nonstop flight with a new valuable public asset, a more competition-enhancing outcome would be for American to self-fund new SAT service with one of its two flexible beyond perimeter slot-pairs (*i.e.*, without an award of additional slots from the Department). What's more: American could launch its new nonstop DCA-SAT flight without even sacrificing a point on its expansive DCA route map, as both of American's flexible slot pairs are used to fund double-daily nonstop service to LAX.¹⁵ Exhibit DL-C-402. Importantly, American is the only carrier participating in this proceeding who could reallocate a flexible DCA

¹⁴ JetBlue Application at 22, n.46.

¹⁵ In fact, American is the only DCA competitor in this proceeding that holds two flexible beyond perimeter slot pairs; all other competitors hold one or zero.

beyond perimeter slot-pair and still maintain its market presence in all of its beyond gateway hubs. Exhibit DL-C-403. An additional slot award to American – the dominant carrier at slot-controlled DCA – to the exclusion of Delta, who needs an additional slot-pair to serve all its western U.S. hubs nonstop from DCA, would be an inequitable result.

Delta acknowledges that American’s proposal to serve SAT from DCA expressly meets the first criterion of the FAA Act, insofar as it enhances options for nonstop travel to a beyond perimeter airport – SAT – that does not currently have nonstop service from DCA. Nor does Delta dispute American’s observation that DCA-SAT is the third largest origin and destination pair in the continental United States that currently lacks nonstop service or its assertion that San Antonio “has a thriving economy, bolstered by a rapidly expanding and diverse population.”¹⁶ But Delta does dispute the premise underpinning American’s statement that “*an award of [an additional slot pair] to American will enable American to initiate new competitive beyond-perimeter service between SAT and DCA.*”¹⁷ This statement presumes that American’s ability to launch its new DCA-SAT flight hinges on an additional award of slots from the Department in this proceeding.

Not so. American can – and, if it earnestly wishes to do so, should – serve SAT from DCA using one of its two flexible beyond perimeter slot pairs. The regulatory process to effectuate this change is exceedingly simple: American need only notify the Department via letter that it is switching one of its DCA-LAX flights to DCA-SAT.

Instead, American requests an additional slot pair from a position of luxury. With six beyond perimeter slot pairs, American has the unmatched ability to calibrate its DCA beyond perimeter network to satisfy its commercial interests. That American currently chooses to use its beyond perimeter slot pairs to serve Phoenix (3x daily), Los Angeles (2x daily) and Las Vegas (1x daily) is its commercial prerogative. But it is a choice that American has the luxury of making

¹⁶ Application of American in this docket dated July 8, 2024 (“American Application”) at 5.

¹⁷ American Application at 1 (emphasis added).

given its extensive and flexible slot holdings. By contrast, Delta has only two beyond perimeter slot-pairs and is reliant on the Department's decision to inaugurate nonstop service to SEA.¹⁸

American's application is deficient in other respects. For example, American's assertion that a DCA-SAT flight will enhance one-stop connectivity options for consumers traveling between San Antonio and the Eastern United States is a red herring. One-stop connectivity is not one of the two statutory criteria that Congress directed the Department to evaluate in this proceeding. And even if connectivity to beyond points were one of the decisive factors in this case, American's claims that a new SAT flight will enhance connectivity to the Northeast is specious. American can more efficiently connect customers to the beyond-DCA markets it identifies in its application (*i.e.*, New York (JFK and LGA), Boston (BOS), Buffalo (BUF) and Burlington (BTV))¹⁹ over its Charlotte (CLT), and Dallas/Ft. Worth (DFW) hubs. Exhibits DL-C-404 and DL-C-405. Simply put, American doesn't need DCA to serve as a connecting engine to beyond points in the Northeast.

Given the disparity in beyond perimeter slot holdings between American, on the one hand, and all other non-limited incumbents at DCA, on the other, any slot exemptions awarded to American at the expense of Delta's proposal would exacerbate the competitive imbalance at DCA – particularly with respect to beyond perimeter flying. Because American already holds six of the 20 beyond perimeter slot-pairs – two of which are flexible and therefore could be moved to other beyond perimeter destinations without any regulatory review – an award to American would be superfluous and antithetical to the competitive considerations enshrined in Section 502 of the FAA Act. With the exceptions of Alaska, which, like American, holds a disproportionate share of the beyond perimeter slots, and Frontier, no other DCA competitor holds more than two beyond perimeter slot-pairs. United and Delta each hold two, with Southwest and JetBlue holding one apiece. An additional slot award to American at the expense of Delta would fortify the strongest

¹⁸ Delta acknowledges that one of its two beyond perimeter slot pairs, which it currently uses to fund DCA-LAX service, is flexible. But, unlike American, Delta could not move a slot-pair to fund service to a new beyond perimeter destination (*e.g.*, SEA) without sacrificing service to another of its west coast hubs (*i.e.*, LAX).

¹⁹ See American Application at 5.

DCA carrier while depriving air travelers of the substantial consumer and competitive benefits that Delta would deliver with its nonstop DCA-SEA flight.

V. Southwest's Las Vegas Proposal Has Similar Competitive Attributes to Delta's and Therefore Warrants Consideration for Selection.

Delta recognizes the strong competitive attributes of Southwest's application to launch nonstop service from DCA to Las Vegas. To its credit, Southwest's application demonstrates an earnest commitment to enhancing competition in furtherance of the second criterion in Section 502 of the FAA Act. Southwest's proposal shares key similarities with Delta's; indeed, Delta and Southwest are the only non-limited incumbent applicants in this proceeding willing to mount a direct challenge to an incumbent on a single-carrier route lacking nonstop competition (*i.e.*, American at LAS, Alaska at SEA), which is precisely the type of competition that Congress envisioned when it passed the FAA Act. Given the procompetitive merits of Southwest's application, Delta would understand if the Department concludes that Southwest's DCA-LAS proposal warrants selection.

VI. Delta Abstains from Comment on Other Applications.

Delta has no comment on the applications filed by Alaska, Frontier, and Spirit in this proceeding. Those three carriers are, or prospectively will be, in a separate slot exemption eligibility pool and therefore Delta will not occupy the Department's resources with a point-by-point comment on their respective proposals. Should the Department make any adjustments to the eligibility decisions reflected in its instituting Notice, Delta reserves the right to comment at the appropriate time.

VII. Conclusion

The lackluster applications submitted by United and JetBlue, and the superfluous application submitted by American, underscore why Delta's DCA-SEA proposal is well deserving of selection in this proceeding. Granting all three of those proposals to the exclusion of Delta would harm competition by cementing Alaska's commanding position in the DCA-SEA, perpetuating the competitive imbalance at slot-controlled DCA, and depriving the traveling public

of enhanced choice and improved product and service offerings. Delta's new beyond perimeter flight to Seattle deserves selection because it will honor the core objectives of the FAA Act and enhance competition to a degree unmatched by any other applicant.

Respectfully submitted,



Steven J. Seiden
For DELTA AIR LINES, INC.

101 **Grading the Non-Limited Incumbents Against the Statutory Criteria**













201-204 **United’s Proposal Doesn’t Enhance Competition**

301-303 **JetBlue’s Proposal Doesn’t Enhance Competition, Either**

401-405 **American Has More Than Enough DCA Slots to Self-Fund San Antonio**

Of the Non-Limited Incumbents, Only Delta, Southwest, and American Meet Statutory Criteria, With 2 Proposals Clearly Inferior: JetBlue and United

Statutory criteria clearly preferences slot awards for service that either adds new markets or enhances competition; JetBlue and United proposals do neither

Proposed Destination	New Market?	Enhances Competition?
 SEA		
 SAT*		
 LAS		
 SJU		
 SFO		

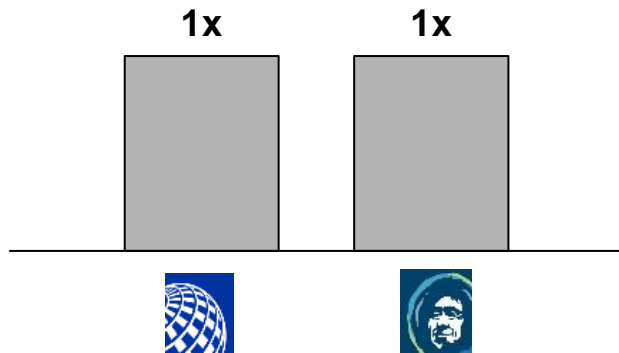
*While American's SAT service would add a new market to DCA, American can self fund SAT by reallocating a LAX-DCA slot pair today

United's Proposal to Add a 2nd SFO-DCA Frequency Does Not Enhance Competition, but Rather Creates a Service Advantage vs Alaska

SFO-DCA Competitive Landscape

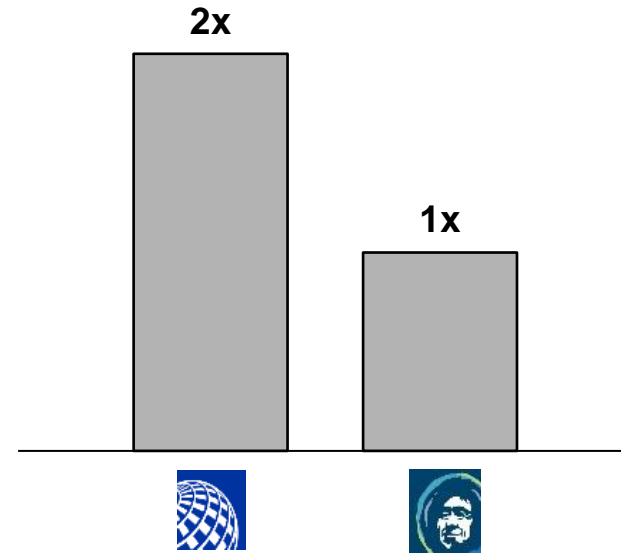
Source: Cirium June 2024

Current



Competitive

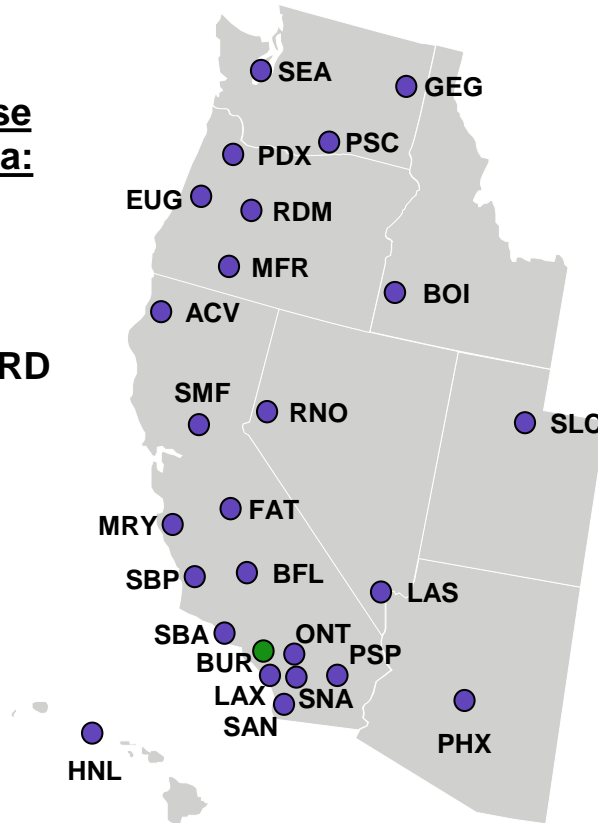
United Proposal of 2nd SFO-DCA Frequency



United's 2nd SFO-DCA Frequency Would Create an Advantage of Double Daily Service

United Can More Efficiently Connect Domestic West Coast and Pacific NW Destinations over DEN and/or ORD Compared to SFO

Shortest Elapse Travel Time Via:

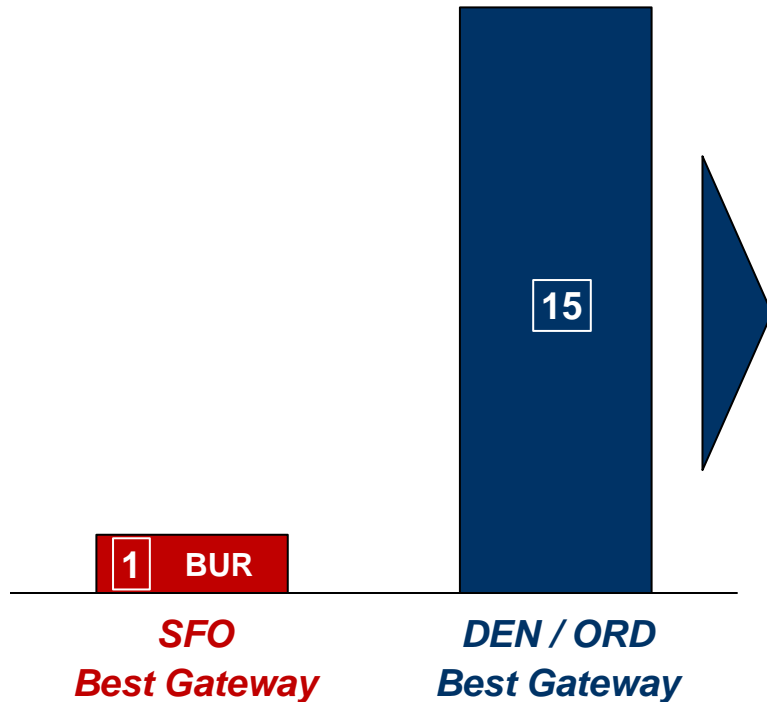


- United’s application states that time channel optionality and connectivity are benefits of a 2nd SFO-DCA, but **such benefits do not meet the statutory criteria**
- Furthermore, United’s stated connectivity benefits are **actually minimal**
- United’s hubs of **Chicago (ORD) and Denver (DEN)** are **less circuitous** connecting complexes for the West Coast and Pacific NW compared to SFO
- **Only 1 of 25 U.S. cities cited in United’s application (BUR)** has a lower elapsed trip time over SFO vs DEN and/or ORD

United's Supplemental DCA-SFO Flight Only Enables One More Efficient Round Trip Connection vs Today's DEN/ORD Gateways: Burbank (BUR)

- Of the 16 Domestic markets United would newly connect round trip via a 2nd SFO-DCA frequency, only BUR most efficiently connects over SFO compared to today's existing DEN/ORD connectivity
- Of the remaining 15 markets, passengers save on average of over 3.5 hours of travel time round trip via DEN/ORD compared to proposed SFO service

United's New Round Trip Connections Enabled by SFO-DCA #2



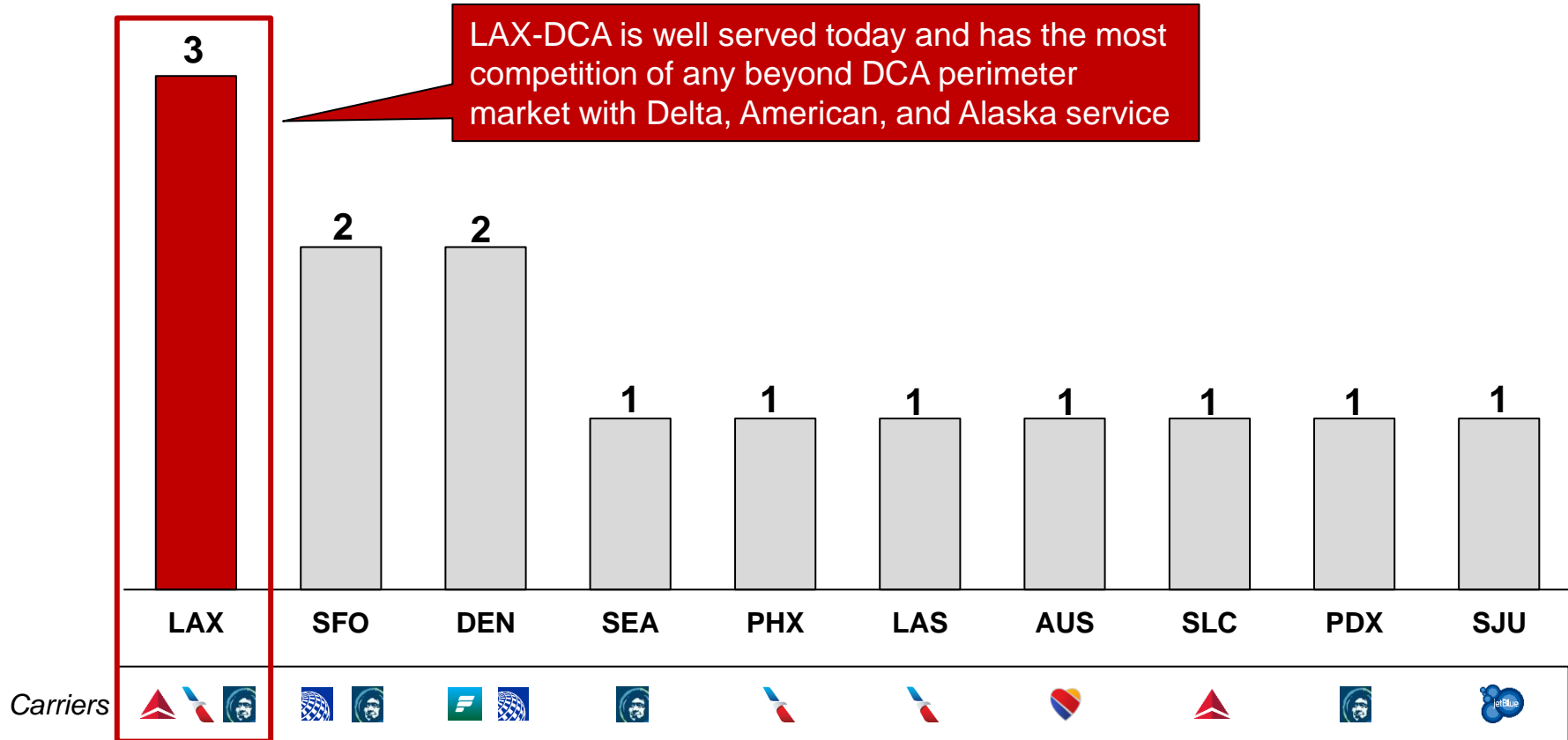
Market	Best Hub (EB/WB)	DEN/ORD Elapsed RT	SFO Elapsed RT	Difference in Elapsed Time
SNA	ORD	15:17	17:10	(01:53)
PHX	ORD	12:58	18:33	(05:35)
FAT	DEN/ORD	15:04	20:16	(05:12)
GEG	ORD	13:27	24:05	(10:38)
ONT	DEN	14:39	17:42	(03:03)
SEA	ORD/DEN	15:14	18:43	(03:29)
PSC	DEN	15:11	20:40	(05:29)
PSP	ORD	15:27	21:53	(06:26)
BOI	DEN/ORD	13:21	15:33	(02:12)
SLC	ORD	12:38	15:53	(03:15)
EUG	DEN	15:48	19:47	(03:59)
MRY	DEN	15:38	18:22	(02:44)
HNL	ORD	24:54	26:19	(01:25)
ACV	DEN	15:39	16:36	(00:57)
BFL	DEN	15:28	16:40	(01:12)

Source: Cirium October 2024; Elapsed RT represents total bi-directional round trip travel time between DCA and beyond SFO market

LAX has Meaningful Competition Today and Is the Only Beyond DCA Perimeter Market That Has More Than Two Carriers

Number of Carriers Today in DCA Beyond Perimeter Markets

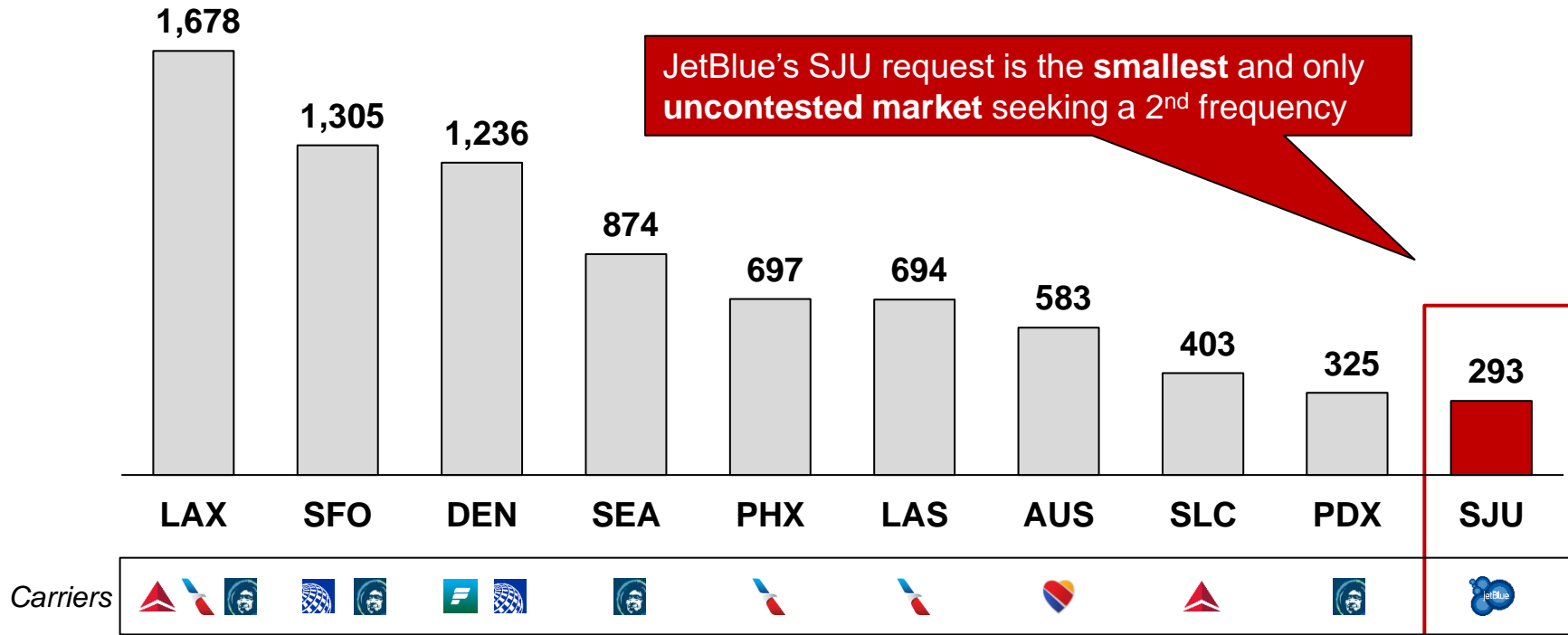
Sorted by # of Carriers Served, then WAS2¹ Demand || Source: Cirium FY2023



¹WAS2 defined as DCA & IAD

SJU is the Smallest Market Beyond the DCA Perimeter, and Granting JetBlue's Request for a 2nd Frequency Would Only Bolster an Uncontested Market

Beyond DCA Perimeter Market Size – by Washington 2 PDEW¹



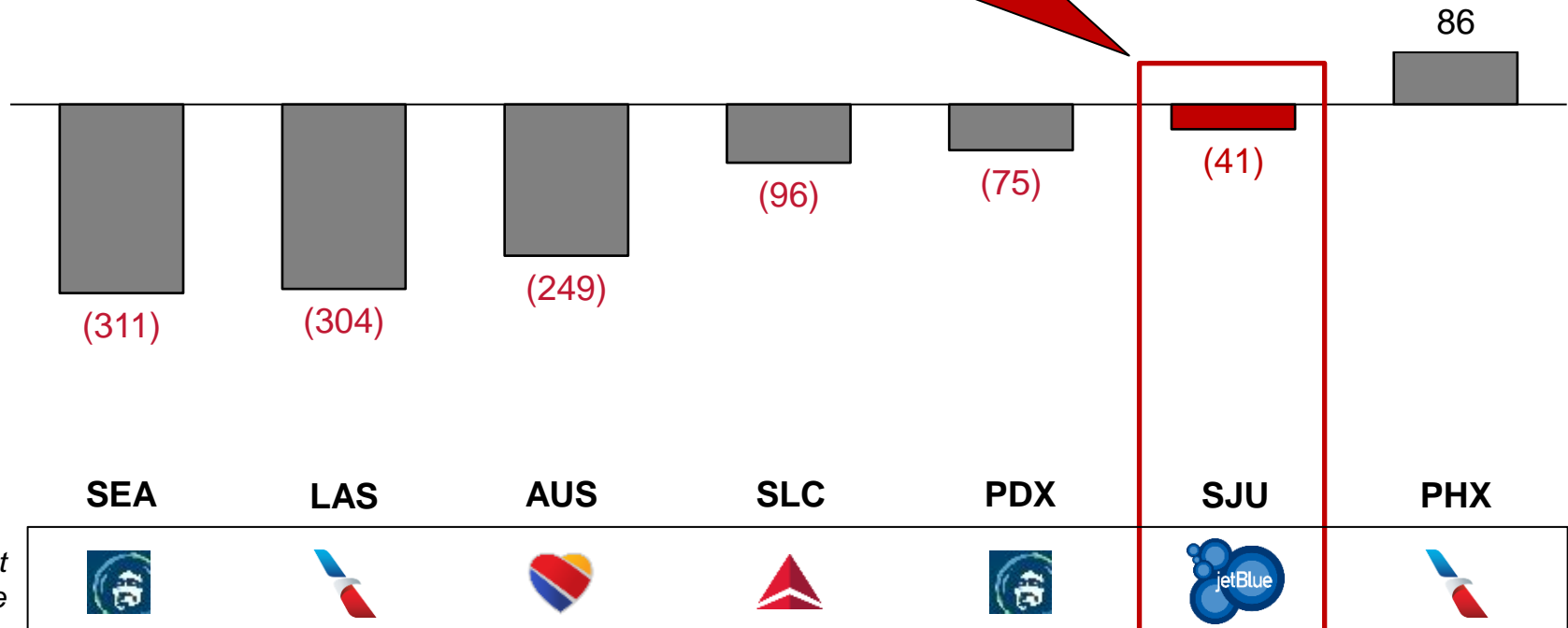
Source: Cirium FY2023 passengers per day each way (PDEW)

¹Washington 2 defined as DCA & IAD

Of the Applications, SJU is the Single-Carrier Market Least in Need of Additional Service Beyond the DCA Perimeter

Current Seat Supply¹ vs Local Market Size² in DCA Beyond-Perimeter, Single-Carrier Markets

SJU has the lowest imbalance of DCA seat supply vs local demand of all single carrier markets



¹Source: Cirium FY23 PDEW² compared to average daily seats (SDEW) in Jun 2024

²Assumes 72% of observed local IAD/DCA market prefers DCA in an unconstrained perimeter environment (methodology detailed in original application)

JetBlue's Beyond SJU Connectivity Benefits Are Minimal, With All of the Largest Caribbean Market Connections Listed in JetBlue's Application Currently Online Today via JFK / SJU Hubs



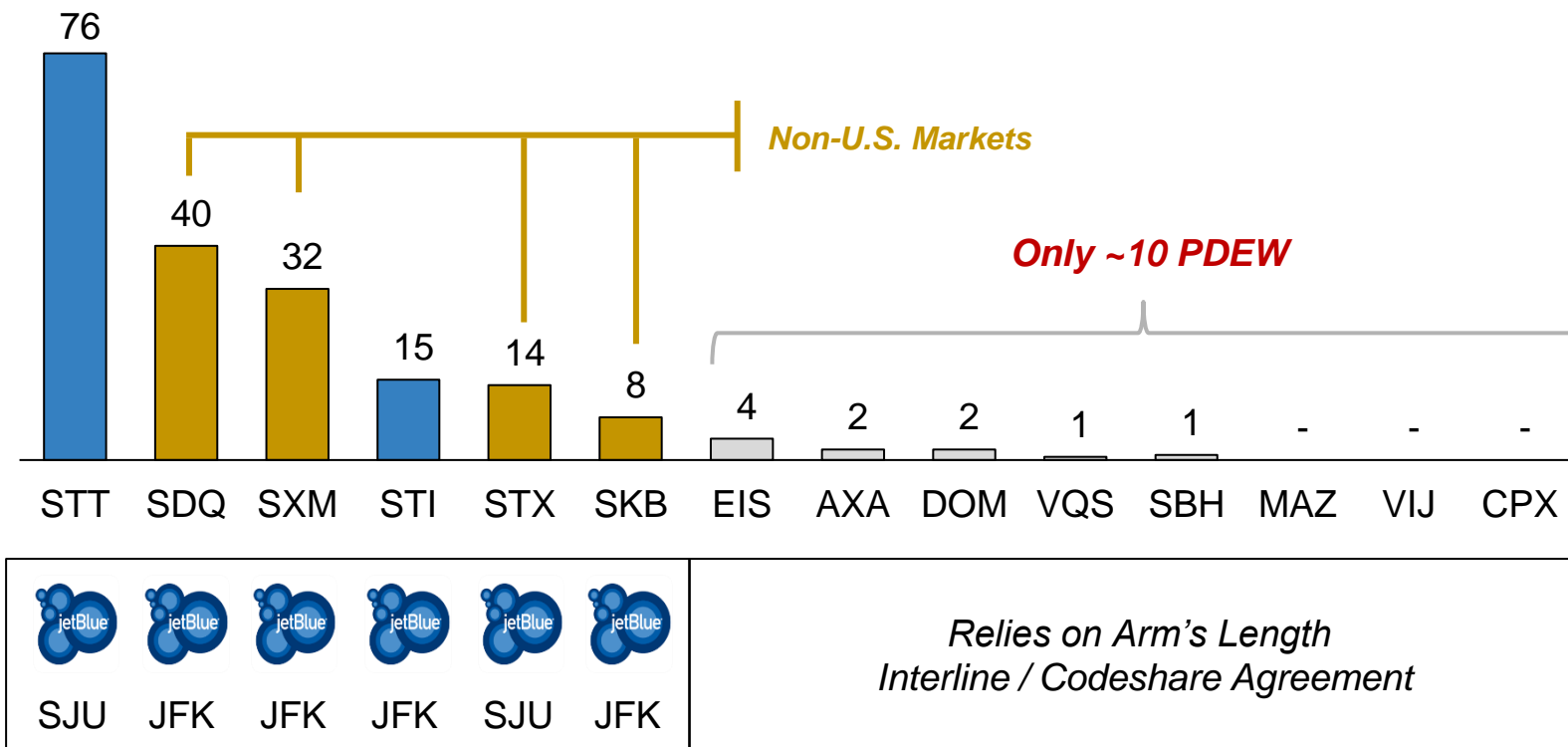
Docket DOT-OST-2024-0065

Exhibit DL-C-303

Page 9 of 14

JetBlue's connectivity benefit claims are misleading given that they cover ~95% of connecting market demand listed in their application today via SJU and JFK

Washington 2 Demand¹ to Beyond SJU Caribbean Markets in JetBlue's Application



Current JetBlue Connecting Gateway

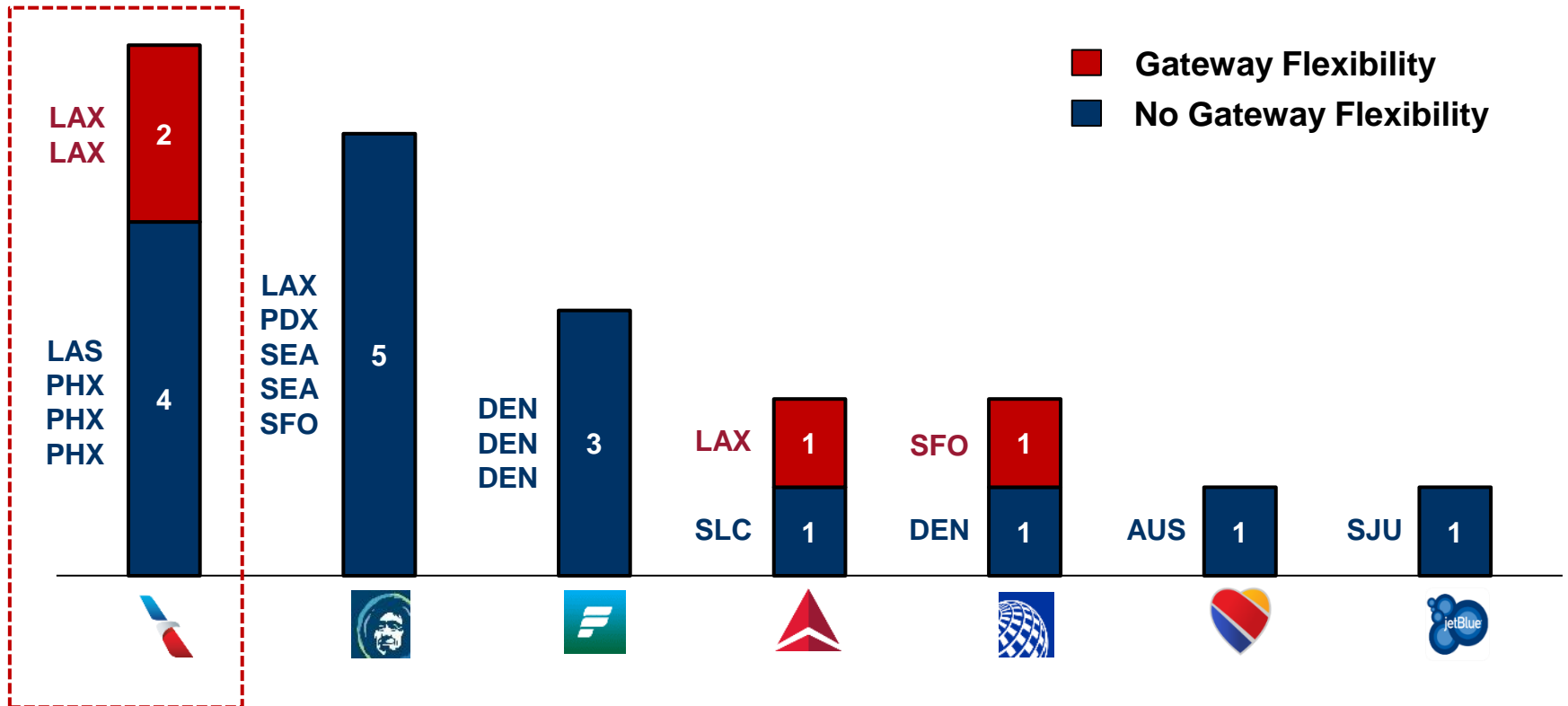
¹Washington 2 defined as DCA & IAD, demand sourced from Cirium FY2023

American Possesses the Most DCA Beyond Perimeter Slot Pairs and Also has the Most Flexibility in Beyond Perimeter Slots

American Has 2 Gateway Flexible Slot Pairs, Both Being Used for LAX Service; One of these Slot Pairs Could be Used Today to Fly SAT-DCA

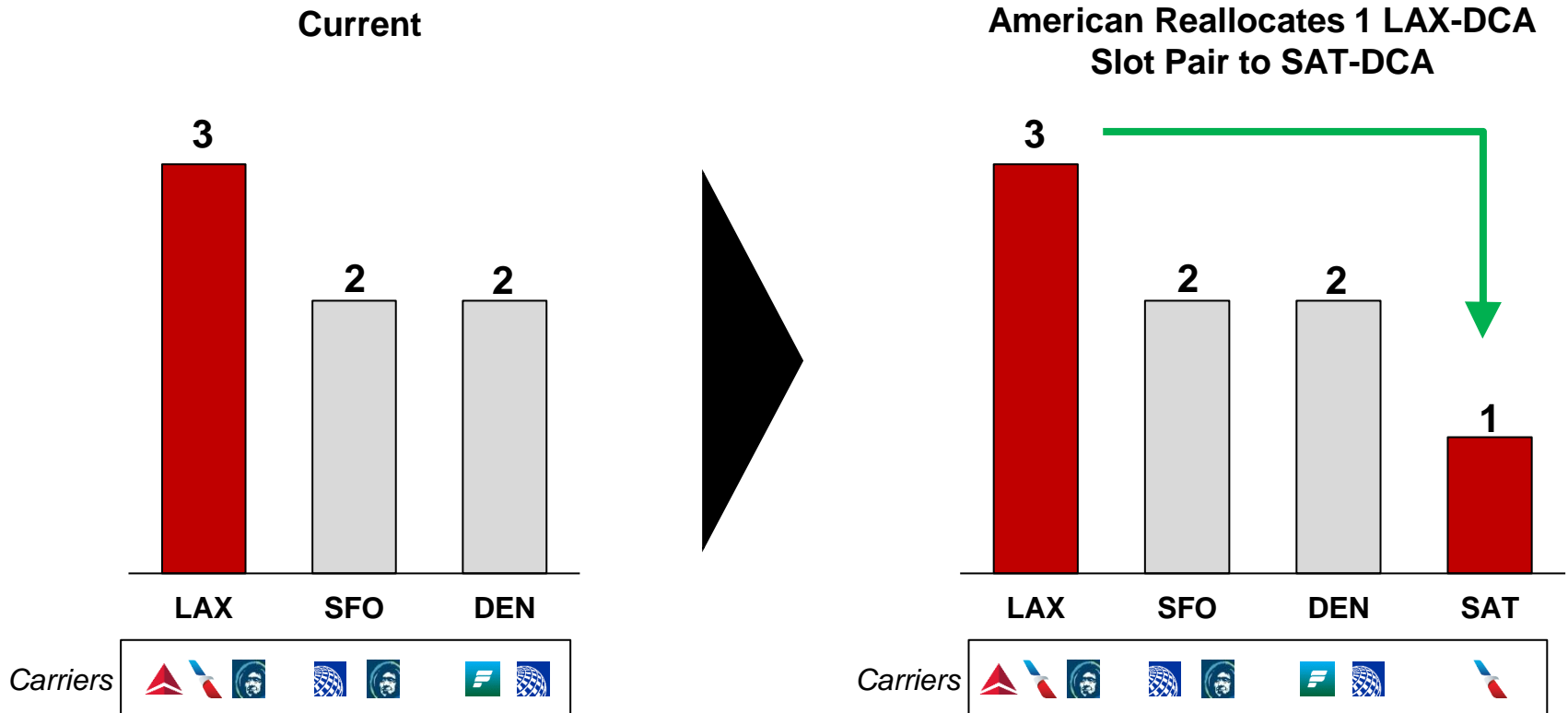
Beyond Perimeter Industry Slot Pairs

Source: Cirium June 2024



American Could Shift One Gateway Flexible LAX-DCA Slot Pair to Fund SAT-DCA Service Today and the LAX-DCA Market Would Still Remain Competitive with Three Carriers

Number of Carriers in Current Multi-Carrier DCA Beyond Perimeter Markets



Both of American's Gateway Flexible Slots Currently Being Used for DCA-LAX, Providing an Advantage of Double Daily Service

LAX-DCA Remains Competitive With 3 Carriers if American Reallocates 1 Gateway Flexible Slot Pair to Start SAT-DCA

American is the Only Carrier Who Could Reallocate One of Their DCA Beyond Perimeter Gateway Flexible Slots and Still Maintain Respective Market Presence

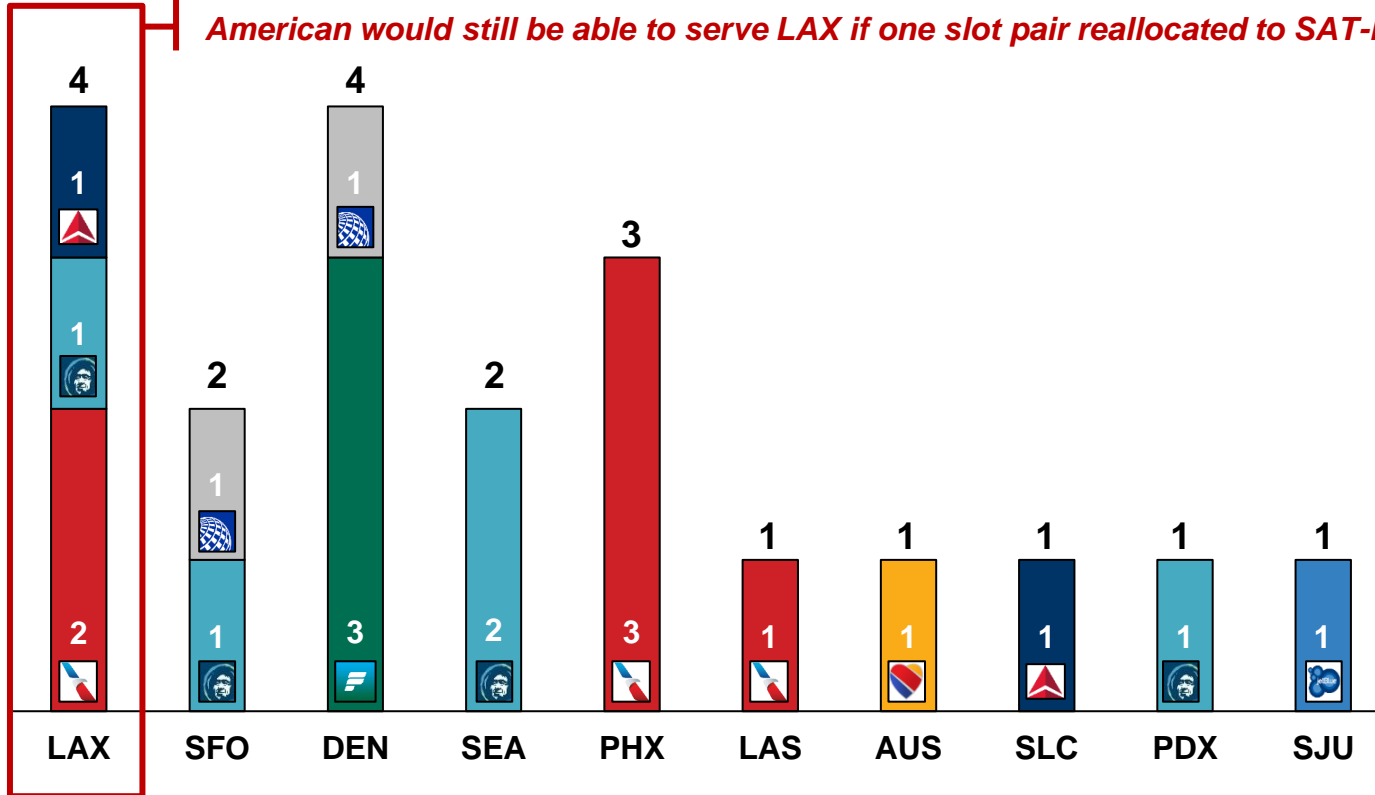
DCA Beyond Perimeter Industry Slot Pairs by Market Size

Sorted by WAS2¹ Demand || Source: Cirium FY2023

Robust service with 3 non-LCC carriers

Both American LAX slot pairs gateway flexible

American would still be able to serve LAX if one slot pair reallocated to SAT-DCA



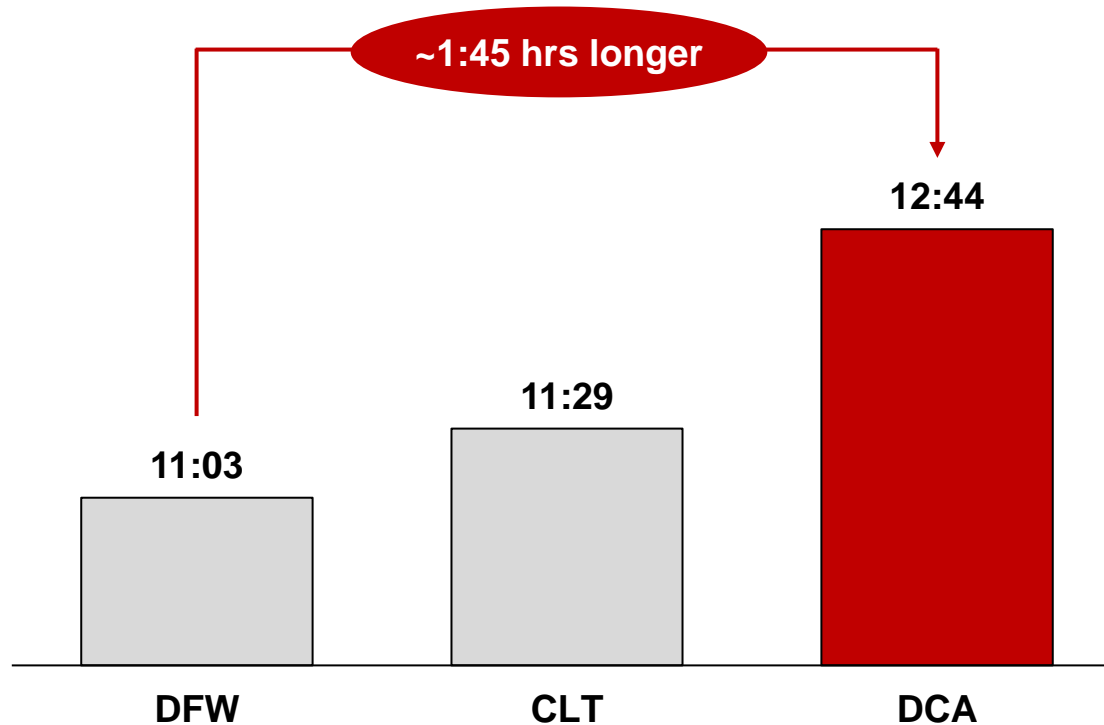
Carrier	Gateway Flexible Slots	Gateway Assigned Slots
	2 LAX	4
	--	5
	--	3
	1 SFO	1
	1 LAX	1
	--	1
	--	1
Total	4	16

¹WAS2 defined as DCA & IAD

American More Efficiently Connects Northeast Domestic Markets via its Core Connecting Gateways vs DCA

- In the 12 markets American listed in its application as having round-trip connectivity on SAT-DCA, connecting in DFW / CLT saves consumers on average ~1:15 – 1:45 hrs of travel time vs connecting via DCA
- Furthermore, ORD / PHL offer additional connecting options with minimal circuitry vs DCA

Average Total Round-Trip Elapsed Time by American Hub

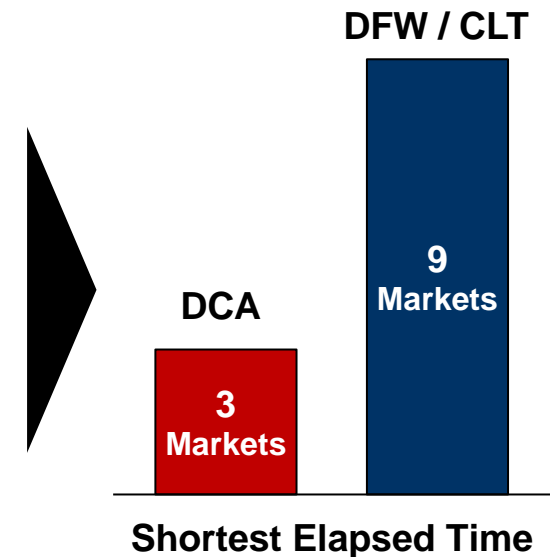


American's SAT-DCA Enhanced Connectivity Claims are Misleading, as The Vast Majority of Connecting Markets Listed In Their Application Connect More Efficiently Over CLT / DFW

Of American's 12 markets with round-trip connectivity on SAT-DCA referenced in their application, 75% have better round-trip total elapsed travel time connecting through either CLT or DFW

American Round-Trip Connectivity Analysis on SAT-DCA

Market	Best Hub (EB/WB)	DFW/CLT Elapsed RT	DCA Elapsed RT	Difference in Elapsed Time
BOS	DFW	11:45	11:48	(00:03)
JFK	DFW/CLT	11:29	14:54	(03:25)
LGA	DCA	11:12	11:06	+00:06
PHL	DFW	10:31	12:33	(02:02)
RDU	DFW	09:21	12:43	(03:22)
BUF	DFW	10:21	11:18	(00:57)
BDL	CLT	11:14	12:34	(01:20)
PVD	CLT	11:13	12:31	(01:18)
GSO	CLT/DFW	09:01	15:06	(06:05)
MHT	CLT	11:43	13:11	(01:28)
BTV	DCA	12:01	11:50	+00:11
HPN	DCA	13:40	13:16	+00:24



DCA less efficient connecting hub

APPENDIX A

Congress of the United States

Washington, DC 20515

The Honorable Pete Buttigieg
Secretary
U.S. Department of Transportation
1200 New Jersey Avenue SE
Washington, D.C. 20590

July 10, 2024

Dear Secretary Buttigieg,

We are pleased to write this letter encouraging the full and fair consideration of the application from Delta Air Lines (Delta) for the allocation of a new flight between Seattle-Tacoma International Airport (SEA) and Ronald Reagan Washington National Airport (DCA).

If awarded, Delta's flight between SEA and DCA will increase access to the nation's capital and all the cultural, historic, and governmental resources and assets the Washington, D.C. region has to offer. More importantly, DCA serves as the gateway for Americans to exercise their constitutional right to petition their government. We believe access to DCA should be as unrestricted as possible, and that travel options to and from Washington, D.C. should be numerous, affordable, and efficient.

This is exactly why we are proud to support Delta's application to expand service between SEA and DCA. A new flight between SEA and DCA will also help increase competition at two important travel gateways that currently lack the kind of robust competition that can help lower costs for consumers. At DCA, 30 percent of all beyond-perimeter flights are operated by a single carrier, including multiple frequencies to the same destinations.¹ Similarly, direct service between SEA and DCA is limited to two flights per day operated by a single carrier, making it one of the largest beyond-perimeter markets without competition.²

As champions of the bipartisan *DCA Act* and numerous efforts to add more flights at DCA, we support Delta's application to expand consumer choice and help lower prices along this important route. SEA is one of the nation's leading global gateways, and Delta has helped grow the Seattle market over the last decade. Notably, Delta flies to more international destinations than any other carrier at SEA, expanding domestic access and connectivity to strategic global markets for trade, tourism, and other economically significant measures of development.³

¹ *Reagan National Airport – Information on Effects of Federal Statute Limiting Long-Distance Flights*, Government Accountability Office (Nov. 2022), <https://www.gao.gov/assets/gao-21-176.pdf> at 34 and 35.

² *CY2023 Enplanements at All Commercial Service Airports – Preliminary*, Federal Aviation Administration (Jun. 18, 2024), https://www.faa.gov/airports/planning_capacity/passenger_allcargo_stats/passenger/cy23_commercial_service_enplanements.

³ *Seattle Tacoma International Airport*, Delta News Hub (Apr. 8, 2024), <https://news.delta.com/mediakit/seattle-tacoma-international-airport>.

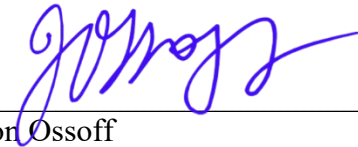
Delta is also an economic engine in Georgia, and an expansion of its network will pay dividends for the more than 34,000 Delta employees based in Georgia.⁴ We are eager to see the benefits of new opportunities for travel between SEA and DCA benefit Georgians across the state.

We encourage your full and fair consideration of this application, consistent with all agency rules and regulations.

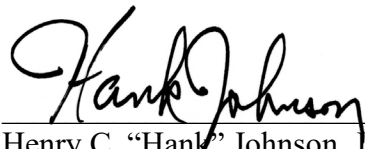
Sincerely,



Reverend Raphael Warnock
United States Senator



Jon Ossoff
United States Senator



Henry C. "Hank" Johnson, Jr.
Member of Congress

⁴ *Delta Invests in Employees Across the Globe, Provides Profit Sharing Equal to 10.4% of Annual Pay*, Delta News Hub (Feb. 14, 2024), <https://news.delta.com/delta-invests-employees-across-globe-provides-profit-sharing-equal-104-annual-pay>.



July 15, 2024

The Honorable Pete Buttigieg
Secretary
U.S. Department of Transportation
1200 New Jersey Avenue SE
Washington, D.C. 20590

Dear Secretary Buttigieg:

The Washington State Labor Council, AFL-CIO (WSLC) is in strong support of a new non-stop flight between Ronald Reagan Washington National Airport (DCA) and Seattle-Tacoma International Airport (SEA). This new flight – one of the five flight pairs recently authorized in the Federal Aviation Administration (FAA) Reauthorization bill – will help support the many labor jobs that make every daily flight possible.

WSLC is Washington's largest labor organization, comprised of more than 600 union locals and councils representing over 550,000 rank-and-file union members throughout Washington State. Our members include tens of thousands of workers in the aviation field.

SEA is the largest beyond-perimeter market without competition. SEA has 600 local daily passengers yet remains underserved. Only two direct flights on a single carrier operate between SEA and DCA each day. More flights are needed to meet demand, boost competition and give consumers more choices at more affordable prices.

Not only will a new DCA-SEA route benefit consumers; it will also create jobs. Introducing another nonstop flight will create new opportunities to hire additional airport personnel to accommodate more passengers. Building our workforce is critical and we should make every effort to help it grow.

As the U.S. Department of Transportation (DOT) decides where to allocate the five new flights, we strongly encourage you to prioritize Seattle and the Pacific Northwest. A new DCA-SEA route will help consumers and labor alike. Please support our members and improve affordable access between the Evergreen State and Washington, D.C.

Sincerely,

Sybill Hyppolite
Government Affairs Director
Washington State Labor Council, AFL-CIO

7/8/2024

Dear Secretary Buttigieg and Esteemed Members of the Pacific Northwest Congressional Delegation,

I am writing to express my wholehearted support for Delta Air Lines' bid to secure one of the newly authorized flight slots from Seattle-Tacoma International Airport (SEA) to Ronald Reagan Washington National Airport (DCA) as per the recent Federal Aviation Administration (FAA) Reauthorization bill. This development is critical for enhancing the connectivity and economic vitality of our region.

Washington State has seen a substantial growth trajectory, particularly in the Seattle area, which has expanded by 40% over the past decade. However, this growth has not been matched by an equivalent increase in direct flight options to Washington, D.C. Currently, SEA, our primary international gateway, is underserved with only one carrier offering direct service to DCA. This limits our community's travel options and hampers both business and personal travel efficiency.

Introducing a new direct flight between SEA and DCA will address these limitations by providing much-needed competition. This competition will benefit consumers by offering more choices, better flexibility, and potentially lower prices. Furthermore, it will alleviate the need for travelers to rely on less convenient connecting flights or alternative airports such as Dulles International (IAD) or Baltimore-Washington International (BWI).

The addition of this direct flight will significantly benefit our diverse community. It will support local businesses by facilitating easier access to the nation's capital for business meetings and lobbying efforts. It will enhance educational opportunities for students and ease the travel burden on tourists and local residents. This flight will also enable nonprofit organizations and local governments to more effectively engage in advocacy work in Washington, D.C.

As Lieutenant Governor, I have a deep understanding of how critical robust transportation infrastructure is for our state's economic development and overall quality of life. Ensuring our region has direct and efficient access to Washington, D.C., is not only a matter of convenience but also a strategic economic imperative. Strengthening these connections will foster growth and prosperity for our residents and businesses alike.

I urge the U.S. Department of Transportation and the Pacific Northwest Congressional delegation to give full support to Delta Air Lines' application for this new flight slot. This move will be a significant step towards enhancing our state's transportation network and ensuring it meets the growing needs of our dynamic region.

Thank you for your consideration and continued commitment to improving our transportation infrastructure.

Sincerely,

Denny Heck
Lieutenant Governor
Washington State



Olympia Office:
505 12th Ave SW, Rm 116
PO Box 40425
Olympia, WA 98504-0425
(360) 786-7648
Chris.Gildon@leg.wa.gov

Washington State Senate

Senator Chris Gildon
25th Legislative District

District Office:
101 S. Meridian
Puyallup, WA 98371
Suite 202
(253) 281-1746
Legislative Phones:
Hotline: 1-800-562-6000
TTY: 1-800-833-6388

July 9, 2024

The Honorable Pete Buttigieg
Secretary, U.S. Department of Transportation
1200 New Jersey Avenue SE
Washington, D.C. 20590

Dear Secretary Buttigieg,

I am writing to share my support of Delta Airlines' application for the allocation of a new flight between Seattle-Tacoma International Airport (SEA) and Ronald Reagan Washington National Airport (DCA). The recent approval of five new daily beyond-perimeter flights as part of the recent Federal Aviation Administration (FAA) Reauthorization bill provides Washington State and the broader Pacific Northwest with an exciting opportunity to expand access to our nation's capital.

Currently, Washington State residents face limited options for direct air service to Washington, DC. At this time, only two direct flights per day operate between SEA and DCA. This limited access forces travelers to utilize connecting flights or longer direct flights to Washington Dulles International Airport or Baltimore-Washington International Airport, making the trek more time consuming and costly. Washington State's economy, local businesses, students, and nonprofits stand to benefit greatly from the added flight to and from Washington state to our nation's capital.

The Seattle market has grown 40 percent in 10 years yet remains underserved from DCA compared to its peers in the West. As the U.S. Department of Transportation (USDOT) considers applications from airlines for these five new flight pairs, I urge you to prioritize Delta Airlines' application for a route to SEA. A new daily route to DCA will deliver much-needed access and affordability to residents throughout the Pacific Northwest.

Thank you for your consideration.

Respectfully,

Senator Chris Gildon
25th Legislative District

Committees: Housing & Local Government (*Assistant Ranking Republican*) • Ways & Means (*Assistant Lead Operating Budget*)

• Business, Financial Services, Gaming & Trade



Olympia Address:
230 John A. Cherberg Building
PO Box 40436
Olympia, WA 98504-0436
E-mail: Noel.Frame@leg.wa.gov
Web address:
<https://senatedemocrats.wa.gov/frame/>

Washington State Senate

Senator Noel Frame
36th Legislative District

Telephone:
Office: (360) 786-7670
TTY: 1-800-833-6388
Toll-Free: 1-800-562-6000

July 11, 2024

The Honorable Pete Buttigieg
Secretary
U.S. Department of Transportation
1200 New Jersey Avenue SE
Washington, D.C. 20590

Dear Secretary Buttigieg,

I write to share my support of Delta Air Line's application for the allocation of a new flight between Seattle-Tacoma International Airport (SEA) and Ronald Reagan Washington National Airport (DCA). The recent approval of five new daily beyond-perimeter flights as part of the recent Federal Aviation Administration (FAA) Reauthorization bill provides Washington state and the broader Pacific Northwest with an exciting opportunity to expand access to our nation's capital.

For far too long, Washington state residents have faced limited options for direct air service to Washington, D.C.: just two direct flights per day operate between SEA and DCA. This limited access forces travelers into longer connecting flights, or direct flights to the further out Washington Dulles International Airport or Baltimore-Washington International Airport. Our current options are often time-consuming and costly. Washington state's economy, local businesses, students, and nonprofits stand to benefit greatly from the added traffic to and from this Washington to the other Washington provided by this additional flight.

A potential new flight from SEA to DCA enables Pacific Northwest residents to travel more conveniently and at lower costs, unlocking countless benefits that access to our nation's capital has to offer. Flights to Washington, D.C. have impacts on civic engagement and on multi-jurisdictional partnerships. We can and should make visits more accessible to constituents, advocates, experts, department staff, and elected officials at all levels of government.

As the U.S. Department of Transportation (USDOT) considers applications from airlines for these five new flight pairs, I urge you to prioritize Delta Air Lines' application for a route to SEA. A new daily route to DCA will deliver much-needed access and affordability to local residents throughout the Pacific Northwest.

Thank you for your consideration.

In service,

Noel Frame
State Senator
36th Legislative District

July 12, 2024

The Honorable Pete Buttigieg
Secretary
U.S. Department of Transportation
1200 New Jersey Avenue SE
Washington, D.C. 20590

Dear Secretary Buttigieg,

As you know, the Pacific Northwest is a major economic engine for the United States. We have companies that need quick access to major airports across the country if we want to maintain our growth. Snohomish County is in strong support of increasing the number of direct flights between airports in Washington State, including Seattle-Tacoma International Airport (SEA), and key airports back east, including Ronald Reagan Washington National Airport (DCA). The approval of five new daily beyond-perimeter flights as part of the recent Federal Aviation Administration (FAA) Reauthorization bill provides the state of Washington and the broader Pacific Northwest with an exciting opportunity to expand access to policymakers and regulators in our nation's capital.

There are a number of major Washington companies that have headquarters in the Washington, D.C. area. We believe providing additional options for those companies to access D.C. as conveniently as possible is not only good for policymakers and regulators but also good for the companies. We currently have one direct flight that provides great service to DCA. However, a second would provide even more opportunities for those who travel to the nation's capital.

In addition, making more connections to DCA for our Congressional delegation would ensure they have additional flexibility to fulfill their responsibilities. We work closely with our delegation, including Members who have key transportation roles, and providing additional flexibility for them would benefit our entire region.

As the U.S. Department of Transportation considers applications from airlines for these five new flight pairs, I request an additional route to SEA. A new daily direct route to DCA will deliver much-needed access and affordability to local residents and businesses across the Pacific Northwest.

Thank you for your consideration.

Sincerely,



Dave Somers
Snohomish County Executive



July 16, 2024

The Honorable Pete Buttigieg
Secretary
U.S. Department of Transportation
1200 New Jersey Avenue SE
Washington, D.C. 20590

Secretary Buttigieg,

Amazon writes to strongly support Delta Air Lines' application for a new flight between Seattle-Tacoma International Airport (SEA) and Ronald Reagan Washington National Airport (DCA).

Established in Seattle in 1994, we now have two primary headquarters: one in Washington state's Puget Sound region with nearly 70,000 employees and the other in Arlington, Virginia with currently 8,000 employees. Given the need for members of our team to travel between these two headquarters locations, we believe that improved direct access, affordability, and convenience between SEA and DCA will benefit our employees, as well as the many consumers and small businesses in the Evergreen State and National Capital Region.

Amazon is excited by the growth and opportunities from the five new flight pairs from DCA that the Federal Aviation Administration recently authorized. We respectfully encourage you to award Delta Air Lines a new SEA-DCA route to increase travel options, economic growth, affordability, and convenience.

Thank you for your consideration.

Sincerely,

A handwritten signature in black ink, appearing to read "Brian Huseman". The signature is fluid and cursive, with a large initial "B" and "H".

Brian Huseman
Vice President, Public Policy and Community Engagement

From: Fred Humphries (Microsoft)
Date: July 15, 2024
To: Michael Halle (DOT)
Subject: Delta's recent formal application

Michael,

On behalf of Microsoft, we want to support Delta Air Lines' recent formal application to the U.S. Department of Transportation for the operation of daily, nonstop service between Seattle-Tacoma International Airport and Washington Reagan National Airport. This move is a response to the FAA Reauthorization Bill authorizing new round-trip flights with beyond-perimeter status at DCA. Currently, due to the federal perimeter rule, carriers are limited to flights within 1,250 miles, and this new service would be a significant step towards increasing competition and choice in the market.

Delta has proposed to utilize A321neo aircraft for this daily service, boasting energy efficiency and superior onboard products, aligning with Delta's and DOT's sustainability goals. The proposed schedule facilitates convenient travel times for passengers, with the eastbound flight departing at 8:00am and arriving at 4:00pm, and the westbound flight departing at 5:00pm and arriving at 8:00pm.

It's important to note that Delta is currently at a competitive disadvantage at DCA, holding only two beyond-perimeter slot pairs and lacking service from SEA. In contrast, American and Alaska serve from all their western hubs, with American also having the most beyond perimeter flights and flexible slot-pairs.

The support for Delta's SEA-DCA service is substantial, with endorsements from various airports, labor groups, organizations, and officials. Delta's investment in SEA has transformed it into a leading West Coast hub, with a 260% growth in seat capacity and the addition of 47 new destinations over the past decade.

Delta's dedication to operational and customer excellence has earned it recognition as America's most-awarded airline, with high operational reliability and accolades in various satisfaction studies and employer rankings. This proposal promises to bring competitive, reliable, and high-

quality service to a crucial transcontinental route, and we believe it merits serious consideration by the DOT.

Thanks

A handwritten signature in black ink that reads "Fred". The letters are cursive and fluid.

Frederick S. Humphries, Jr.

Corporate Vice President, US Government Affairs





June 27, 2024

The Honorable Pete Buttigieg
Secretary
U.S. Department of Transportation
1200 New Jersey Avenue SE
Washington, D.C. 20590

Dear Secretary, Buttigieg:

The Washington Build Back Black (WBBA) Alliance strongly supports the approval of Delta Air Lines' application to initiate new direct service between Seattle-Tacoma International Airport (SEA) and Ronald Reagan Washington National Airport (DCA).

Today, Washington State residents seeking to travel to Washington, D.C. are confronted with limited flight options. Only two direct flights per day operate between SEA and DCA on a single airline. This shortage creates significant challenges for our community, driving up airfare costs and reducing travel accessibility. Approving Delta Air Lines' application would address this issue, enhancing direct access between Washington state and Washington, D.C.

[WBBA](#) is a coalition of non-profit executives and business leaders from historically marginalized communities devoted to achieving racial equity through six core areas: Economic Development, Environmental Justice, Digital Equity, Healthcare Disparities, Criminal Justice Reform, and Food Insecurity. This visionary collective brings with them more than 60 years of national experience related to public policies and unwavering dedication towards progress regarding furthering key causes around social justice. With resounding clarity and conviction, we give voice to those who are often unheard and unseen.

The lack of competition in the current SEA-DCA market not only drives up airfare prices but also makes travel more expensive and less accessible for consumers – many of which are WBBA members working to advocate for their issues within the halls of Congress and the Administration. Introducing another nonstop flight will foster competition, offering travelers more options, increased flexibility, and ultimately lower prices. This is particularly crucial for WBBA members and the communities we serve, as affordable air travel is vital for our advocacy work in the nation's capital.



Our success in advancing economic development, environmental justice, and social equity in Washington State is deeply intertwined with our ability to engage with federal lawmakers and agencies in Washington, D.C. The current travel limitations certainly impact our efforts to advocate for federal funding and policy changes that could improve the lives of residents in our state. By adding this new direct flight, we can make advocacy mission to Washington

D.C. – where we work to ensure the needs and voices of our communities are heard – more accessible.

We urge the Department of Transportation to award Delta Air Lines the new daily nonstop route between SEA and DCA. Improved access to our nation’s capital is imperative for our region’s residents and businesses to thrive and for our advocacy efforts to continue making a significant impact.

I’ll be in DC from July 22nd to July 26th for a Hill Hike with the United Way of King County. I welcome the opportunity to discuss the needs of our constituents in person. I can be reached at: paulasardinas@fmsglobalstrategies.com

Sincerely,

Paula Sardinias

Founder & CEO

Washington Build Back Black Alliance

June 24, 2024

The Honorable Pete Buttigieg
Secretary
U.S. Department of Transportation
1200 New Jersey Avenue SE
Washington, D.C. 20590

Dear Secretary Buttigieg,

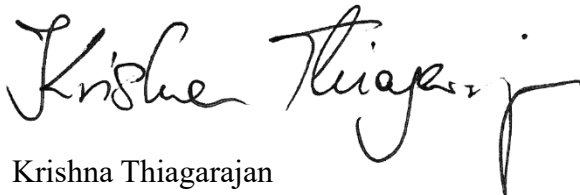
The Seattle Symphony is in strong support of Delta Air Lines' application for a new flight between Ronald Reagan Washington National Airport (DCA) and Seattle-Tacoma International Airport (SEA). We believe this new flight will give more opportunities for East Coast music enthusiasts to travel to Seattle to experience our award-winning music in person.

The Seattle Symphony was recognized as one of the "most vital American orchestras" by National Public Radio (NPR). We are internationally acclaimed, performing in Benaroya Hall in the heart of downtown Seattle from September through July. We reach more than 750,000 people annually through live performances and radio broadcasts, and through the Seattle Symphony+ streaming service.

People from all over the country come to see our world-class musicians. Unfortunately, SEA is the largest beyond-perimeter market without competition. Currently, one airline operates just two direct flights per day between SEA and DCA, which makes airfare unnecessarily expensive and hinders East Coast tourists from traveling to Seattle. This new daily direct flight will boost competition, lower ticket prices and greatly improve direct access between Washington State and Washington, D.C.

The Seattle Symphony is eager to bring more people together through the power of music. We respectfully ask that you approve Delta Air Lines' application so they can introduce new nonstop SEA-DCA route.

Sincerely,

A handwritten signature in black ink that reads "Krishna Thiagarajan". The signature is written in a cursive style with a long, sweeping tail on the final letter.

Krishna Thiagarajan
President & CEO
Seattle Symphony



National Congress of American Indians | 1516 P St NW, Washington, DC 20005 | (202) 466-7767 | www.ncai.org

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*Minnesota Chippewa Tribe
Leech Lake Band*

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*Santa Rosa Rancheria
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Jennifer Finley
Confederated Salish & Kootenai Tribes

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Reggie Tupponce
Upper Mattaponi Indian Tribe

SOUTHERN PLAINS
Reggie Wassana
*Cheyenne and Arapaho Tribes of
Oklahoma*

SOUTHWEST
Raymond Aguilar
Pueblo of Santo Domingo

WESTERN
Randi Lone Eagle
Summit Lake Paiute Tribe

EXECUTIVE DIRECTOR
Larry Wright, Jr.
Ponca Tribe of Nebraska

July 16, 2024

The Honorable Pete Buttigieg
Secretary
U.S. Department of Transportation
1200 New Jersey Avenue SE
Washington, D.C. 20590

Dear Secretary Buttigieg,

Founded in 1944, the National Congress of American Indians (NCAI) is the oldest, largest, and most representative American Indian and Alaska Native organization serving the broad interests of Tribal Nations and communities. Our Recording Secretary, Council Member Nickolaus Lewis of the Lummi Nation brought to our attention an opportunity of importance to transportation needs the Tribal Nations of the Pacific Northwest. By way of background, the Lummi people are the original inhabitants of Washington State's northernmost coast. For thousands of years, they have worked and celebrated life on the Puget Sound. Like so many of our Member Tribal Nations, they take great pride that their homeland is a place the Lummi people and others can continue to enjoy to this day.

The approval of five new beyond-perimeter slot pairs at Ronald Reagan Washington National Airport (DCA) as part of the recently passed Federal Aviation Administration (FAA) Reauthorization bill is an exciting opportunity for the Lummi people and all Washington State residents. Indeed, we believe it is an exciting opportunity for all of the Tribal Nations of the Pacific Northwest.

Delta Air Lines has applied for a new daily flight using one of these new slots to provide service between Seattle-Tacoma International Airport (SEA) and DCA. We strongly support Delta Air Lines' application and urge the Department of Transportation to award them the new slot pair.

A new flight between SEA and DCA will increase competition in the air travel market, increasing affordable, convenient access between Washington, D.C. and Washington State. More travelers from the National Capital Region will be able to



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visit Washington State and the Pacific Northwest via Seattle to experience the many gems that the region has to offer, including learning about the Native people who call it home.

Additionally, giving passengers more choices and more affordable access will allow Washington State residents to experience the wonders of our nation's capital. Our next generation of leaders and their families will be able to marvel at its rich history and see our federal government at work.

It is important to also highlight that leaders and representatives of our Tribal Nations routinely travel to Washington, D.C. to represent their peoples, meet with the Administration and with Members of Congress, and share their heritages and customs. As an example, just last year the Chairman of the Lummi Nation testified before Congress. As a further example of sharing heritage and customs, in 2021 the Lummi Nation sent a totem pole to the National Museum of the American Indian to accompany an exhibit on their pole carving traditions. More convenient and affordable air travel to Washington, D.C. will ensure that Tribal Nations and their people can be a part of and witness events like this.

Today, only two flights operate between DCA and SEA. The lack of competition leads to high airfares for those seeking direct flights. Others who travel between the two cities must take unnecessary connecting flights that make the journey much longer and costly. These factors put the trip out of reach for far too many. More convenient and affordable access will benefit the Tribal Nations of the Pacific Northwest and all Washington State residents.

As you consider applications for the five new slot pairs recently authorized at DCA, the National Congress of American Indians encourages you, on behalf of the Lummi Nation and our Tribal Nations in the Pacific Northwest, to award Delta Air Lines the flight between SEA and DCA.

Sincerely and with respect,

Mark Macarro
President
National Congress of American Indians

CERTIFICATE OF SERVICE

A copy of the foregoing Comments has been served this 17th day of July, 2024, upon the following persons via e-mail:

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