

BEFORE THE  
DEPARTMENT OF TRANSPORTATION  
WASHINGTON, D.C.

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Comments of :  
 :  
 UNITED AIRLINES, INC. :  
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 in the matter of 2024 Ronald Reagan Washington : Docket DOT-OST-2024-0065  
 National Airport Slot Exemption Proceeding :  
 Pursuant to 49 U.S.C. § 41718 :  
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CONSOLIDATED COMMENTS OF  
UNITED AIRLINES, INC.

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July 17, 2024

BEFORE THE  
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United<sup>1</sup> submits these Comments in response to the Applications of American,<sup>2</sup> Delta,<sup>3</sup> JetBlue,<sup>4</sup> and Southwest<sup>5</sup> pursuant to the Department’s Notice.<sup>6</sup> United is confident its competition-enhancing, congestion-mitigating, and consumer-benefiting proposal for two of the

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<sup>1</sup> Common names are used for airlines.

<sup>2</sup> Application of American Airlines, Inc., Establishment of Slot Exemption Proceeding at Ronald Reagan Washington National Airport Pursuant to 49 U.S.C. § 41718, DOT-OST-2024-0065 (July 8, 2024) (“American’s Application”).

<sup>3</sup> Application of Delta Air Lines, Inc., Establishment of Slot Exemption Proceeding at Ronald Reagan Washington National Airport Pursuant to 49 U.S.C. § 41718, DOT-OST-2024-0065 (July 8, 2024) (“Delta’s Application”).

<sup>4</sup> Application of JetBlue Airways Corporation, Establishment of Slot Exemption Proceeding at Ronald Reagan Washington National Airport Pursuant to 49 U.S.C. § 41718, DOT-OST-2024-0065 (July 8, 2024) (“JetBlue’s Application”).

<sup>5</sup> Application of Southwest Airlines Co., Establishment of Slot Exemption Proceeding at Ronald Reagan Washington National Airport Pursuant to 49 U.S.C. § 41718, DOT-OST-2024-0065 (July 8, 2024) (“Southwest’s Application”).

<sup>6</sup> Except as defined herein, all defined terms shall have the same meaning as defined in United’s Application.

eight available slot exemptions (one round trip) designated for non-limited incumbent<sup>7</sup> carriers to facilitate either a new Washington National – San Francisco (United’s first choice) flight, or a first-ever for United Washington National – Los Angeles (United’s backup choice) flight, will provide maximum public benefits of these valuable new rights and best satisfy requirements of 49 U.S.C. § 41718, the FAA Reauthorization Act<sup>8</sup>, and the Department’s Notice.<sup>9</sup>

### **EXECUTIVE SUMMARY**

Focused specifically on the criteria that the Department is Congressionally mandated<sup>10</sup> to consider in this proceeding – enhancing options for nonstop travel to beyond-perimeter airports that do not have nonstop service from DCA as of the date of the FAA Act or having a positive impact on the overall level of competition in the markets that will be served – United’s proposal for a new route between DCA and SFO, or its backup proposal to initiate service between DCA and LAX, is deserving of two of eight available slot exemptions (one round trip). Of note, JetBlue, Delta, and Southwest all propose to serve a beyond-perimeter airport that currently has nonstop service to/from DCA. Compared on the basis of competitive impact against the Applications of JetBlue, Delta, Southwest, or American, United’s Application<sup>11</sup> for DCA-SFO, or its backup of

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<sup>7</sup> United’s Comments are focused solely on those applicants that the Department has deemed as eligible as “non-limited incumbent carriers” in its Notice; United takes no position on the applications of Spirit and Frontier. *See* Notice at 2.

<sup>8</sup> Pub. L. No. 118-63, S. 1939, 118th Cong. (2024).

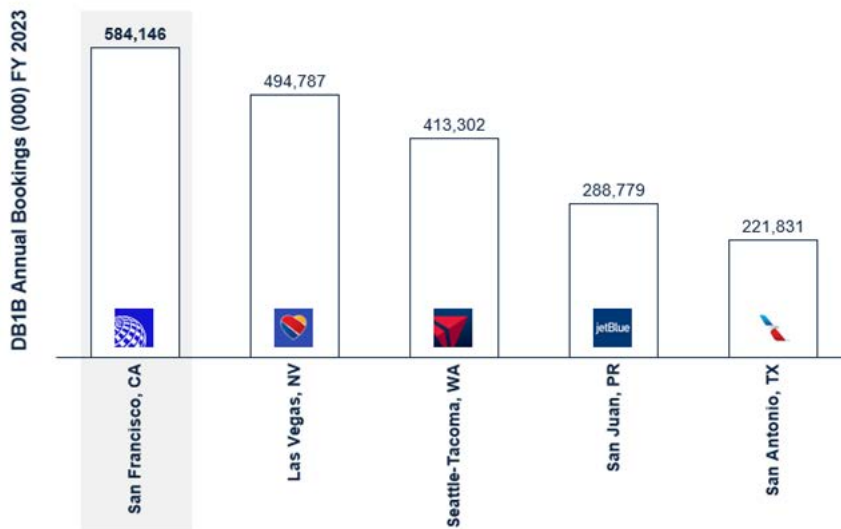
<sup>9</sup> DOT Notice, Establishment of Slot Exemption Proceeding at Ronald Reagan Washington National Airport Pursuant to 49 U.S.C. § 41718, DOT-OST-2024-0065 (June 24, 2024) (“Notice”).

<sup>10</sup> *See* 49 U.S.C. § 41718(i)(4)(B)(i) and (ii).

<sup>11</sup> Application of United Airlines, Inc., Establishment of Slot Exemption Proceeding at Ronald Reagan Washington National Airport Pursuant to 49 U.S.C. § 41718, DOT-OST-2024-0065 (July 8, 2024) (“United’s Application”).

DCA-LAX, stand out as the clear winner – United’s proposal would serve the *largest beyond-perimeter routes for booking demand and metropolitan population* of all those filed in this docket, maximizing the consumer and competitive benefits of the slot pair exemptions requested by United.

**Washington, D.C. Area Booking Demand For Destinations Included In This Proceeding**



Note: "Washington, D.C." includes DCA, IAD, BWI.  
Source: DB1B annual booking FY 2023, nondirectional average

No other application in this proceeding details the myriad public benefits that would emerge from United’s Application, including, but not limited to:

- 1) Serving the most populous and high-demand metropolitan areas of all routes applied for in this proceeding (*see* Exhibits UA-C107, 112, 116, 117);
- 2) Connecting DCA with a far greater number of domestic and international destinations than any other carrier in this proceeding has proposed (*see* Exhibits UA-C102, C104, C105, C106);
- 3) Providing consumers traveling to the West Coast with enhanced itinerary options like improved time-of-day coverage, new connections to/from Washington National via SFO, additional connection opportunities for certain Western U.S. cities, and in the case of DCA-LAX, an opportunity to introduce new carrier competition against the existing incumbents (*see* Exhibits UA-C101, 103, 115);
- 4) Scheduling flight times that avoid congestion and peak hours at DCA (*see* Exhibits C-101, 114); and

- 5) Giving United an opportunity to compete against airlines that have a much larger presence at DCA, e.g. American, and on routes between DCA and the entire U.S. West Coast, e.g. Alaska; (*see* Exhibits UA-C101, 114, 118, 119, 120).

Nor has another carrier provided as much detail on the benefits to U.S. consumers and communities for their service or gateways as United. To be clear, United believes SFO or LAX merit an award over any of the other carriers' proposals in this proceeding, as it will maximize the use of these rare and valuable beyond-perimeter slot exemptions by meeting some of the largest demand tabled in this proceeding, resulting in the most consumer benefits, and enhancing competition.

United's Application has been commended by prominent U.S. law makers and elected representatives, specifically Senator Tammy Duckworth who was one of the main sponsors of the FAA Reauthorization Act. Senator Duckworth, Chair of the Senate Subcommittee on Aviation Safety, Operations and Innovation, recently wrote a letter to Secretary Buttigieg urging "DOT to safeguard DCA passenger experience, safety and operational performance by prioritizing air carrier applications that enhance connectivity and service; strengthen competition; and propose strategically timed flights that proactively seek to mitigate against the threat of worsening DCA's already troubling performance."

Applauding United's proposal in the same letter, she stated:

*United Airlines, Inc. (United), is acting in a responsible manner with its DCA slot waiver application designed to mitigate harm to passenger experience and operational performance at DCA. Specifically, United applied for a slot exemption to operate a long-haul flight between DCA and San Francisco International Airport (SFO) that would feature a morning departure from DCA to SFO and an afternoon departure from SFO to DCA that strategically avoid DCA's most congested hours.*

Senator Duckworth's endorsement of United's DCA-SFO proposal highlights the principled and thoughtful approach United has taken in this proceeding. United's proposed flights are indeed

scheduled in time channels designed to avoid capacity-constrained periods of the day, which is something that Delta and Southwest – applicants in the same non-limited incumbent category as United – cannot claim. United’s proposed flights are also designed to provide the consumer and competitive benefits that Senator Duckworth references in her letter to Secretary Buttigieg.

Beyond the support already highlighted in its Application, United submits as Exhibit II new, robust support letters from elected officials, labor, and connecting airports. United notably – and uniquely among applications thus far – also enjoys support from beyond its proposed destination. United alone boasts support from leaders in Virginia.

New letters of support include the following:

*Elected Officials*

- Senator Tammy Duckworth, Chair, Subcommittee on Aviation Safety, Operations and Innovation; Senate Committee on Commerce, Science and Transportation;
- Members of the Chicago, Illinois Congressional delegation led by Congressman Jonathan L. Jackson, joined by six Members of Congress including: Raja Krishnamoorthi, Bradley Scott Schneider, Mike Quigley, Robin L. Kelly, Danny K. Davis, and Sean Casten;
- Members of the San Francisco, California delegation led by Congressman Eric Swalwell, and joined by eight Members of Congress including: Nancy Pelosi, Mike Thompson, Barbara Lee, Anna G. Eshoo, Kevin Mullin, Zoe Lofgren, Jimmy Panetta, and Josh Harder; and
- Speaker Don Scott, Virginia House of Delegates.

*Labor*

- Captain Anne Worster, Chair, United Airlines Master Executive Council, Air Line Pilots Association, International

Another seven airports that would benefit from additional and connecting service with United’s proposed DCA-SFO service have provided letters of support, including:

- San Francisco, California
- Bakersfield, California

- Fresno, California;
- Humboldt County, California;
- Monterey, California;
- San Luis Obispo, California; and
- Santa Barbara, California.

### **ARGUMENT**

#### **I. UNITED’S APPLICATION WILL PROVIDE SUPERIOR PUBLIC BENEFITS TO ANY OTHER APPLICATION IN THIS PROCEEDING**

United’s first-priority SFO proposal and backup LAX proposal are the strongest contenders in this proceeding among those submitted by non-limited incumbents. Except for San Antonio, which American proposes to serve, all primary routes non-limited incumbents have applied for in this proceeding have existing nonstop service to/from DCA. Specifically, JetBlue, Delta, and Southwest are all targeting cities that currently enjoy service to/from DCA.<sup>12</sup> This puts United on at least equal footing with other non-limited incumbents proposing to serve cities with existing nonstop service to/from DCA; but it is the consumer-enhancing attributes of United’s proposal and the large number of consumers that stand to benefit (the largest in fact of all non-limited incumbent carrier applications) that make United’s proposal superior to those of JetBlue, Delta, and Southwest. Considering the competitive impact of enriching American, the king at DCA, through award of additional slots, United’s proposal is superior to American’s as well, despite it vying to open a new route to/from DCA.

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<sup>12</sup> Alaska services Seattle (SEA); Delta services Salt Lake City (SLC); JetBlue services San Juan (SJU); American, Alaska, and Delta service Los Angeles (LAX); and American services Las Vegas (LAS).

**A. United is Proposing to Serve the Most Populous Metropolitan Areas with the Highest Levels of Demand of All Applied-For Routes in this Proceeding**

United's first-priority DCA-SFO service will serve the largest U.S. metropolitan area (San Francisco/Oakland/Fremont) of all *primary* routes and the second largest metropolitan area of all routes applied for in this proceeding, with a population of 4.6 million people and an annual existing demand of 584,000 bookings – which further expands to 685,000 on a metro-approach and including the communities served by San Jose (SJC) and Oakland (OAK) that do not have nonstop service to/from DCA.<sup>13</sup> Due to its large size and limited flight options, SFO is also extremely underserved. Booking demand per departing seats on the Washington National – San Francisco route is near the top of all non-limited incumbent carrier proposals with 4.9 passengers flying the route for every seat offered, only slightly behind Southwest's proposal for Las Vegas. *See* Exhibit UA-C107.

Meanwhile, United's backup proposal for a DCA-LAX route will serve the most populous metropolitan area of all applied-for routes in this proceeding. *See* Exhibits UA-C117. With this backup proposal, United will introduce its first-ever nonstop service between DCA and LAX to serve the beyond-perimeter route with the highest booking demand involved in this proceeding. *See* Exhibits UA-122, 123; UA-C116.

The metropolitan areas that other non-limited incumbents have *primarily* proposed to serve are notably less populous.<sup>14</sup> *See* Exhibits UA-C112, C117. And the other proposals by non-limited

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<sup>13</sup> *See* United's Application, at 4.

<sup>14</sup> Delta has proposed to serve the Seattle / Tacoma / Bellevue metro area, with a population of 4.0 million; American has proposed to serve the San Antonio / New Braunfels metro area, with a population of 2.7 million; Southwest has proposed to serve the Las Vegas / Henderson / North Las



incumbents have less booking demand. *See* Exhibits UA-C108, 109, 110, 111. United's DCA-SFO proposal leads Southwest by a wide margin with approximately 90,000 more annual bookings than its Washington, D.C. – Las Vegas route. *See* Exhibits UA-C107, 108. Further, the Washington National – San Francisco route is 1.4 times larger than Delta's proposed DCA-SEA route, two times larger than JetBlue's DCA-SJU proposal, and tops American's San Antonio bid 2.6 times. *See* Exhibits UA-C109, 110, 111. Demand for the Washington National – Los Angeles route is also significantly high, totaling 865,000 bookings per year – the highest number of annual bookings out of all beyond-perimeter destinations from the Washington, D.C. area. *See* Exhibit UA-C116.

United has chosen to prioritize the Bay Area because the facts strongly support such an award by the Department. Despite United and Alaska currently operating flights between DCA and SFO, SFO remains an acutely underserved airport connecting to DCA. This glaring gap in service underscores the need for enhanced connectivity on this route. The numbers do not lie – among the metropolitan areas of all *primary* routes applied for in this proceeding, the Bay Area is the largest, has the highest demand and greatest potential for consumer benefit, and connects the most beyond U.S. points to/from DCA (*see* Exhibits UA-103; C102), which has a positive impact on the overall level of competition in the markets that will be served as a result of the exemptions being made available.

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Vegas metro area, with a population of 2.3 million; and JetBlue has proposed to serve the San Juan / Bayamon / Caguas metro area, with a population of 2.0 million.

**B. United's Proposals Offer the Most Connectivity Options Out of Any Applicant in this Proceeding and Enhances Competition the Most**

United's proposals stand head and shoulders above the rest in this proceeding, offering unparalleled connectivity and convenience to consumers as well as injecting much-needed competition in important markets.

United's DCA-SFO proposal will provide consumers with round trip connections to 25 domestic and seven international destinations served beyond San Francisco. *See* sources cited *id.* United has explained in detail the connectivity benefits of its proposal, demonstrating United's focus on consumers and communities. *See* Exhibits UA-104; UA-C103. No other non-limited incumbent in this proceeding comes close to matching the sheer number of round trip connections that United's proposal delivers.

United's proposal will provide online one-stop connecting opportunities to twice the number of cities proposed by American and 1.3 times more connecting opportunities than Southwest's proposal. *See* Exhibits UA-C104, 105. And with a closer look, JetBlue's proposed DCA-SJU-DCA schedule *actually* provides **zero** same-day, round trip connections at SJU despite all of its boasting of enhancing connections and competition to U.S. points beyond San Juan. *See* Exhibit UA-C106. Delta, oddly enough, does not reference any beyond connectivity for its flights between DCA and SEA in its application. Either there are no connections, which is unlikely, or a more likely scenario is that Delta did not think to consider consumer connecting benefits in the midst of its usual exaggeration<sup>15</sup> about its competitive position and presence.

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<sup>15</sup> *See, e.g.,* Motion for Leave to File and Sur-Reply of United, Docket DOT-OST-2019-0014 (“Delta . . . is singularly focused on enhancing its own competitive position at the expense of the public interest...”); *see also* Answer of Delta at 7 (May 25, 2022), 2022 US-South Africa

Moreover, both of United's proposals will inject much needed competition into crucial markets in both the nonstop and beyond connecting cities. United's first-priority proposal for additional SFO service offers a chance for United to provide needed supply in a route where demand has long out-paced supply and go head-to-head with airlines that are larger at DCA (*e.g.*, American) and those with a stronger foothold on routes between DCA and California and the West Coast (*e.g.*, Alaska). *See* Exhibits UA-111, 112, 113; UA-C118, 119, 120.

### **C. United's Proposals Will Offer Consumers Unparalleled Itinerary Choices**

United's proposed DCA-SFO service will operate at non-congested times at DCA and will provide enhanced time-of-day itinerary options for consumers traveling from beyond SFO or between SFO and DCA in either direction. *See* Exhibit UA-C101. Travelers can mix and match segments from United's current flight and the proposed new flight to best suit their travel plans. *See* Exhibits UA-104, 105; UA-C103. Likewise, United's backup proposal for LAX will offer consumers new itinerary choices by representing a fourth competitive offering on the route.

United is setting firsts in this proceeding with its proposed flight schedules: (1) the only morning departure from DCA to SFO and 12 hours earlier than United's existing flight, (2) the only afternoon departure from SFO to DCA, (3) the earliest arrival at LAX of all airlines operating the route, and (4) the last morning departure from LAX of all airlines operating the same.<sup>16</sup> No other applicant has gone to the same lengths as United in considering how best to give consumers more time-of-day choice to plan their trips, (*e.g.*, to be able to fly across the country from DCA

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Combination Frequency Allocation Proceeding, Docket-DOT-OST-2022-0050 (complaining about United's "structural advantage," "three-frequency advantage," and needing "parity").

<sup>16</sup> *See* United's Application, at 6-8.

and arrive at SFO at the beginning of the day and/or to depart SFO mid-way through the California work day and what is nearly the end of the East Coast time zone work day). Delta certainly did not give time-of-day coverage any thought. Its proposed SEA-DCA-SEA flights are planned within 40 minutes of current flights operated by Alaska. *See* Exhibit UA-C132. United's commitment to consumer choice and convenience makes its proposals stand out in this proceeding.

Moreover, United's backup proposal to initiate nonstop service to/from LAX will inject fresh competition on the DCA-LAX route, which is currently served by three incumbent airlines (Alaska, American, and Delta) that operate a total of four daily departures. *See* Exhibits UA-119, 120; UA-C114, 115. United's proposed flight will depart DCA in the early morning, offering the only opportunity for a full day in Los Angeles with a pre-10:00am arrival, and a departure from LAX uniquely and conveniently scheduled in the late morning hours. *See* Exhibits UA-120; UA-C115. United's proposed new service will offer consumers a much-needed competitive alternative, breaking the status quo, and providing more choices for flights between DCA and LAX.

#### **D. United's Sustainability Leadership: A Cut Above the Rest**

Some applicants have highlighted their sustainability efforts in their applications. If sustainability is a priority for the Department in this proceeding, United is well placed. United is the undisputed industry leader on the subject, especially in the development and use of Sustainable Aviation Fuel (SAF). United is the first global airline to commit to achieving net zero GHG emissions by 2050, without relying on the use of voluntary carbon offsets. To achieve that, United is prioritizing changes to its fuels, aircraft, operations, and equipment rather than merely offsetting its emissions.

This leadership has earned recognition globally – not just among airlines, but among all leading corporations. United’s sustainability reporting and initiatives were rated the highest among major U.S. airlines by the Climate Disclosure Project (CDP)<sup>17</sup> for 2023, and they earned United a spot on TIME’s list of the 100 Most Influential Companies this year – the only airline to make the list. TIME wrote:

To accelerate a paradigm shift beyond petroleum-based jet fuel, United Airlines last year launched the industry’s first-of-its-kind investment fund dedicated to supporting startups focused on the production of sustainable aviation fuel (SAF). If researchers can figure out how to use alternative fuel feedstocks efficiently, SAF could work in existing planes, so the industry is embracing it as the fastest path to decarbonization. The United Airlines Ventures Sustainable Flight Fund now has more than \$200 million in investments from the airline as well as corporate partners including Google, Boeing, and Air New Zealand; United customers have also chipped in nearly \$500,000.

Notably, the United Airlines Ventures Sustainable Flight Fund is acknowledged as a leader in sustainability by its 21 global corporate partners that represent the full aviation value chain. These partners include OEMs like Boeing and GE, financial institutions like JP Morgan, Bank of America, and American Express, and four airlines (JetBlue Ventures, Air Canada, Air New Zealand, and Hawaiian Airlines).

In addition to its global leadership, United is taking considerable action in California. In 2016, United became the first airline globally to use a blend of SAF in regular operations on a continuous basis in California. Since 2023, United has used a blend of SAF in its regular operations from both SFO and LAX. Last year, United used twice as much SAF in its operations as any other U.S. carrier, with the majority consumed on its flights from California. United anticipates more activity on SAF use in the future thanks to another first-of-its-kind program, United’s Eco-Skies

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<sup>17</sup> See United Airlines Disclosure, Carbon Disclosure Project, *available at* [CDP](#).

Alliance, wherein United partners with its corporate customers to reduce their GHG emissions from travel with United by funding the green premium. Since the program's launch, the Eco-Skies Alliance has grown to include nearly 40 corporate customers, supporting the use of over 11 million gallons of SAF and reducing the collective environmental impact by over 115,000 mT CO<sub>2</sub>e – an amount equivalent to removing 27,370 cars from the road for one year.<sup>18</sup>

As an airline, most of United's emissions are derived from the fuel it takes to fly a plane. But United is also tackling its emissions on the ground. As of December 2023, more than 35% of United's total ground support equipment fleet was electric. Notably, at its hubs like SFO, nearly half of United's entire ground service equipment has been electrified.

United's leadership in sustainability propels the industry forward in efforts to reduce GHG emissions and makes United the best-suited airline to leverage these slot exemptions, providing significant benefits to passengers, employees, and the broader community.<sup>19</sup>

## **II. OTHER NON-LIMITED INCUMBENT CARRIER APPLICATIONS MISS THE MARK; UNITED'S FIRST- OR SECOND-CHOICE PROPOSAL MERIT AN AWARD OF TWO OF THE SLOT EXEMPTIONS**

United comments on and objects to the applications of JetBlue, Delta, Southwest, and American (the other non-limited incumbent carriers).<sup>20</sup> United is not commenting on the application of Alaska, because the Department has indicated that Alaska is not eligible for the

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<sup>18</sup> Calculation based on EPA's Greenhouse Gas Equivalencies Calculator: <https://www.epa.gov/energy/greenhouse-gas-equivalencies-calculator#results>.

<sup>19</sup> See Exhibit II, Letters of Support from Senator Tammy Duckworth; Members of the Chicago, Illinois Congressional delegation; and Virginia House of Delegates Speaker Don Scott.

<sup>20</sup> See Notice, *supra* note 9, at 2.

same pool of slot exemptions as United.<sup>21</sup> Additionally, United is not commenting on the seemingly unauthorized applications by Spirit and Frontier because the Department has indicated that neither carrier is eligible to apply in this proceeding. United expressly reserves the right to provide supplementary comments on the non-limited incumbent carrier applications and any amendments, particularly in the event any aspect of the proceeding is modified from what is currently outlined in the Department's Notice.

United asserts that each applicant's proposal should be evaluated based on the decisional criteria set forth in the FAA Reauthorization Act. When scrutinized against that criteria,<sup>22</sup> United's proposal for a new route between DCA and SFO – or its backup plan to initiate service between DCA and LAX – emerges as the unequivocal frontrunner for two of the non-limited slot exemptions (one round trip).

Importantly, United has scheduled its proposed flights from DCA during non-congested hours. *See* Exhibits UA-C101, C114. In contrast, Southwest and Delta have proposed scheduling their LAS and SEA flights, respectively, during hours when operations are unavailable at DCA according to FAA's data on fully allocated hours. *See* Exhibit UA-C123. JetBlue did not even bother to propose a schedule for its DCA-LAX-DCA flight – a proposal United maintains is an afterthought.<sup>23</sup> *See id.* United's planning ensures that its flights operate when the data shows DCA can accommodate them, unlike its competitors who seem to have ignored this crucial factor.

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<sup>21</sup> *Id.*

<sup>22</sup> *See* 49 U.S.C. § 41718(i)(4)(B)(i) and (ii).

<sup>23</sup> *See* Objection of United Airlines (Jul. 9, 2024), Docket DOT-OST-2024-0065.

And in terms of substance, the other airline applications are also lackluster. JetBlue's application is a scattershot of half-baked ideas, built on hearsay and overly optimistic projections. Delta and Southwest have presented applications that fall short of the Department's criteria and ultimately are inferior proposals when compared to United's. The Department should view Delta's application with skepticism given Delta's relentless pursuit of its self-interested commercial agenda at DCA. And as for American, it filed the briefest of proposals that was light on substance, seemingly wanting to rest on its laurels that a new beyond-perimeter route from DCA would be a shoo-in win. While that may seem to be the case on the surface, San Antonio is a smaller metropolitan area than many others in consideration; the route has limited booking demand, and evidently American, despite all its scale and scope at DCA, cannot connect SAT to more than 12 cities behind DCA on a same day, round trip basis. And to be clear, no applicant's current beyond-perimeter route performs demonstrably better on a load factor basis than any other route. *See* Exhibit UA-C122.

Last, but certainly not least, of all applicants in the same category, JetBlue stands out because it already commands a significant share of booking demand on its proposed route, DCA-SJU, at a glaring 81% share. *See* Exhibit UA-C124. It is hard to believe there is much room for incremental gain for the traveling public by JetBlue when JetBlue already commands such a large portion of traffic.

**A. JetBlue's Application for DCA Slot Exemptions is Fundamentally Flawed and Fails to Meet the Criteria that Should Guide the Department's Decision Making**

United's proposal clearly has more positive impact on competition than JetBlue's focus-lacking and misinformed proposal. JetBlue implausibly claims that there are competitive benefits



for what would become a second JetBlue flight on an already well-served route. Instead of demonstrating the benefits of its proposal, JetBlue's application is replete with pleas to be saved from their own poor business decisions. JetBlue is not struggling because they are small.<sup>24</sup> Alaska Airlines and JetBlue are nearly the exact same size,<sup>25</sup> yet in 2023 JetBlue lost \$310 million<sup>26</sup> while Alaska generated a \$235 million<sup>27</sup> profit. Even Allegiant Airlines, an airline nearly 75% smaller than JetBlue, generated a profit in 2023. JetBlue seems to operate under the mistaken belief that the Department is a bailout agency for airlines that cannot manage the consequences of their own commercial decisions. However, the Department's mission in this proceeding is to select proposals that will benefit consumers and enhance competition, not to prop up airlines that find themselves at a disadvantage of their own making. The Department should not reward JetBlue for blaming the government for its failed network and business development plans<sup>28</sup> by granting it another route when it has failed to demonstrate the merits of its proposal and when its proposed flight fails to generate meaningful consumer benefits.

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<sup>24</sup> See, e.g., JetBlue's Application at 21 ("JetBlue, like most smaller airlines, has struggled financially since the COVID pandemic.").

<sup>25</sup> Diio Mi, FY 2023 ASMs

<sup>26</sup> SEC filings, JetBlue Airways Corporation, Annual Report (Form 10-K) (Feb. 12, 2024).

<sup>27</sup> SEC filings, Alaska Air Group, Inc., Annual Report (Form 10-K) (Feb. 14, 2024).

<sup>28</sup> See JetBlue's Application at 22 ("To date, the federal government has taken steps to prevent JetBlue from addressing these significant and increasingly existential scale challenges on its own but it has not otherwise sought to identify a path for smaller airlines such as JetBlue to grow. As a result, JetBlue and other smaller airlines are being forced to make extremely difficult decisions such as JetBlue's recent decision to close some stations and drastically shrink its position at Los Angeles International Airport (LAX) and abandon most intra-West flying.")

Further, the JetBlue Application is disjointed and places emphasis on non-decisional criterion, *e.g.*, JetBlue’s humanitarian efforts for the island of Puerto Rico, as exhaustively detailed in its application.<sup>29</sup> While such efforts are commendable, they are not relevant or significant to this proceeding. The Department should remain focused on what truly matters: the statutory criteria, consumer benefits, and enhancing competition.

### **1. JetBlue’s Primary Application Falls Woefully Short of Deserving an Award**

*First*, JetBlue’s primary application *is inferior* as it fails to meet either criterion outlined in the Notice. A second flight between DCA and San Juan operated by JetBlue neither adds service to a new point – since JetBlue already operates this route – nor does it provide any new nonstop competition, as JetBlue is the sole operator on the route. Furthermore, it does not offer meaningful competition in the markets to be served.

*Second*, JetBlue’s proposal *is inferior* to United’s because it serves one of the smallest demand markets among all primary routes in this proceeding. *See* Exhibit UA-C107. JetBlue places significant emphasis on an expansion occurring in San Juan,<sup>30</sup> as if this alone guarantees future demand. But the Department should prioritize routes where demand is already established, not routes based on speculative future scenarios. Currently, the Washington, D.C. – San Juan route represents the second smallest market by passenger demand out of all primary routes applied for

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<sup>29</sup> *See id.* at 15-16.

<sup>30</sup> *See id.* at 7-8 (“While travel patterns have fluctuated in many markets and regions, they have not in Puerto Rico; more customers are travelling to the Caribbean than ever before. New hotels are opening, and the important Port of San Juan is expanding to handle the world’s largest cruise ships.”).

by non-limited incumbents in this proceeding, and DCA-SJU is half the size of United's proposed DCA-SFO route, with 288,776 annual bookings.<sup>31</sup> *See* Exhibits UA-C107, 110. And despite having more DCA service than SJU, SFO still has higher booking demand per DCA nonstop departing seats than DCA-SJU. *See* Exhibit UA-C107.

*Third*, JetBlue's Application *is inferior* to United's because it will result in fewer consumer benefits. Based on United's review of schedules, JetBlue's proposal lacks any connectivity as it will result in *no same-day, round trip beyond connections via SJU*. *See* Exhibit UA-C106. United's proposal, on the other hand, will provide round trip connections between DCA and 25 Western U.S. destinations via SFO. *See id.*

JetBlue boasts connecting opportunities to/from seven destinations beyond SJU,<sup>32</sup> yet no connection occurs on the same day that the proposed JetBlue flight is scheduled to arrive and depart at SJU. *See* Exhibit UA-C127. JetBlue's SJU-DCA flight departs early in the day, while its DCA-SJU flight arrives late,<sup>33</sup> making same-day onward connections nonexistent. The online connections beyond San Juan that JetBlue highlights are either overly circuitous from Washington National (*e.g.*, Cancún, Medellín), predominantly non-U.S. points (*e.g.*, Cancún, Medellín, Punta Cana, Santiago, Santo Domingo), or served on a codeshare or interline basis by partner airlines,

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<sup>31</sup> *See id.* at 4. Even JetBlue acknowledges that San Juan is the 25<sup>th</sup> largest market from the Washington, D.C. metropolitan area.

<sup>32</sup> *See id.*

<sup>33</sup> *See id.* For its DCA-SJU flight, JetBlue has proposed a DCA departure time of 2:00pm and a SJU arrival time of 6:40pm (all local times). For its SJU-DCA flight, JetBlue has proposed a SJU departure time of 9:45am and a DCA arrival time of 12:50pm (all local times).

which can alter their network structure without JetBlue's commercial control.<sup>34</sup> These connections are often operated with small aircraft to mostly non-U.S. destinations. JetBlue even mentions an interline partner flight to Madrid, Spain via San Juan<sup>35</sup> – clearly not what the drafters of the FAA Reauthorization Act envisioned for meeting the U.S. destination-focused criteria. In the 2019 Haneda proceeding, the Department decided against a Haneda slot at Las Vegas as it “proposes to offer connections to only five U.S. points over Las Vegas.” Here, the Department is even more justified in rejecting JetBlue's proposal outright due to its non-existent connections.<sup>36</sup>

*Fourth*, JetBlue's application is *inferior* because San Juan is not as underserved as United's proposal and JetBlue has failed to establish any convincing argument that they will improve fares. JetBlue asserts that its second DCA-SJU service will lower fares even more than the launch of their first flight on the route. This claim is highly suspect. Specifically, JetBlue notes a 9% drop in fares in a single quarter after their launch of DCA-SJU.<sup>37</sup> However, a more honest examination of fares across multiple quarters after JetBlue's launch reveals that the SJU-DCA average fare generally increased – the average DCA-SJU fare in Q4 2013 was 10% above the fare seen prior to JetBlue's SJU-DCA launch, and continued to stay above pre-launch levels for nearly the entirety of 2014. *See* Exhibit UA-C126.

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<sup>34</sup> *See id.* at 4-6.

<sup>35</sup> *See id.* at 6.

<sup>36</sup> *See* DOT Order to Show Cause at 8, DOT Order 2019-5-13 (May 16, 2019), Docket DOT-OST-2019-0014 (denying American's proposed gateway of LAS-HND as it “proposes to offer connections to only five U.S. points over Las Vegas. . .”).

<sup>37</sup> *See* JetBlue's Application at 12.

In fact, there is no historical precedent of an increase in JetBlue's frequency on a comparable DCA route resulting in more than a 9% fare reduction and an average fare reduction of only 7% as seen across five DCA routes that received increased JetBlue flights. *See* Exhibit UA-C125. Therefore, JetBlue's assertions that increasing frequency on the DCA-SJU route could yield up to a 30% reduction in fare are dubious. Additionally, JetBlue's claim that "the average DCA-SJU fare will be less expensive" than United's IAD-PUJ fare,<sup>38</sup> and any other mix-matched comparison JetBlue may try to drive, conveniently ignores the fact that United offers a first-class cabin with naturally higher yields while JetBlue does not.

United is careful to not make future pricing assertions given air travel is priced on many dynamic factors that an additional flight on a route cannot necessarily or reliably control. But what United can show is that on a selection of 20 routes where it has substantially increased the amount of seats year over year, and including routes to/from its proposed SFO gateway, average fares have decreased between 11% and 26%. *See* Exhibit UA-C121.

## **2. The Department Should Discard JetBlue's After-Thought of a Backup Proposal**

The Department should discard JetBlue's "backup" proposal to serve LAX. JetBlue undermines its own proposal by relegating it to a mere footnote,<sup>39</sup> failing to provide the required

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<sup>38</sup> *Id.* at 10-11.

<sup>39</sup> *See id.* at 22 n.46 (providing only the following information about its proposed DCA-LAX service: "Pursuant to Footnote 5 of the Notice, we hereby inform DOT that our backup proposal would be to serve DCA-LAX with Mint-equipped 160-seat Airbus A-321NEO aircraft. Because DOT did not request detailed information regarding backup proposals, JetBlue is not submitting any narrative information or data in support of its backup proposal but will promptly do so, if requested.").

schedule information, and to discuss or even mention any consumer benefits. This half-hearted attempt is not only insufficient but also indicative of JetBlue's lack of commitment to the route.

When compared to United's robust backup proposal to serve LAX, JetBlue's plan falls woefully short. First, JetBlue proposes to use a smaller aircraft than United (Exhibit UA-115),<sup>40</sup> demonstrating a lack of capacity and ambition. While United is investing at LAX, JetBlue is retreating significantly with a 24% reduction in departures 2024 versus 2023. *See* Exhibit UA-C128. Though JetBlue attributes this reduction to their size, similarly sized Alaska has not had a similar reduction at LAX. A more notable distinction between JetBlue and other carriers at LAX is JetBlue's operational unreliability. JetBlue's on-time percentage at LAX trailed far behind LAX's industry average in 2023 (the latest year available for data<sup>41</sup>). This suggests that JetBlue's failings at LAX are a result of its own making in providing an unreliable product.

In summary, JetBlue's backup proposal to serve LAX is inadequate and indicative of a broader pattern of underperformance. The Department should focus on proposals that offer genuine consumer benefits and robust connectivity, not on half-hearted attempts that fail to meet even basic requirements. United is committed to its backup proposal for DCA-LAX, making it the clear choice for maximizing consumer benefits and enhancing competition.

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<sup>40</sup> *See id.* at 22 n.46 (JetBlue is proposing to utilize 160-seat Airbus A321/A321NEO aircraft on DCA-LAX flight).

<sup>41</sup> *See* Air Travel Consumer Report (Issued: Feb. 2024), *available at* <https://www.transportation.gov/sites/dot.gov/files/2024-03/February%202024%20ATCR.pdf>.

The Department should also unequivocally reject any additional information JetBlue may attempt to provide for its backup proposal.<sup>42</sup> The Department’s Notice was clear: carriers were required to submit sufficient details for each proposal in their applications to ensure the purported benefits can be reviewed and commented on at the July 17 submission deadline. JetBlue’s failure to provide this information at the July 8 application deadline is too critical to overlook. JetBlue had its chance to provide supporting information for its backup proposal when it initially filed its application on July 8 rather than relegating the matter to a footnote and commenting that information on the back-up proposal may be supplied later should the Department so request.<sup>43</sup> Allowing JetBlue to supplement its proposal now would undermine the integrity of the process and “create significant due process concerns for those carriers that submitted compliant applications.”<sup>44</sup>

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<sup>42</sup> United firmly stands behind its objection to JetBlue’s motion to disqualify, which is devoid of both procedural grounds and substantive merit. And to be clear: the domestic round-trip connectivity offered by a United 6:30 am departure from DCA to SFO remains unchanged with a 7:00 am departure from DCA to SFO. The same 25 western U.S. cities will maintain round-trip connections with DCA via SFO. The same 16 U.S. cities will gain new round-trip connectivity with DCA through the newly proposed DCA-SFO-DCA flight, and the same 10 U.S. cities will benefit from an additional connecting opportunity via SFO. The only loss from shifting to a 7:00 am DCA departure is westbound connectivity at SFO to certain international destinations, which are not claimed to be integral to the consumer and community benefits of United’s newly proposed DCA-SFO-DCA flight. United’s proposal remains robust and beneficial, despite JetBlue’s baseless objections. *See* Objection of United Airlines (Jul. 10, 2024), Docket DOT-OST-2024-0065.

<sup>43</sup> JetBlue’s Application at 22 n.46.

<sup>44</sup> *See* Motion of JetBlue Airways at 3 (Jul. 10, 2024), Docket DOT-OST-2024-0065.

## **B. Delta's History of Self-Serving DCA Advocacy and Application Should Lose it the Slot Exemptions**

Delta's tactics at DCA and in its Application establish that it does not merit award of a slot pair over United's first- or second-choice proposal.

### **1. Delta's Irresponsible and Self-serving Actions Regarding DCA Should Raise Questions About its Application**

Delta has been far from a responsible party at DCA. Delta was the principal instigator and chief antagonist in the campaign for 56 beyond-perimeter slot exemptions (28 round trips). It's clear that Delta aimed to secure the lion's share of these newly created slots, which would have exacerbated congestion at DCA.

Delta not only failed to acknowledge capacity issues at DCA, but Delta also has been dismissive of concerns raised by the FAA and scornful of the wishes of Virginia's elected leaders who unanimously opposed adding new DCA slots, all the while making false claims as they advocated not 10 but 56 slot exemptions at DCA. Such an increase, as estimated by the FAA, would increase delay at DCA by more than 33%<sup>45</sup> due to the fact that DCA's main runway is already the busiest runway in the country.<sup>46</sup>

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<sup>45</sup> See Memorandum of FAA (May 25, 2023), available at: [2023-05-25 DCA Air Service Analysis Memo.pdf \(washingtonpost.com\)](#).

<sup>46</sup> See Metropolitan Washington Airports Authority pushes back on effort to increase number of DCA flights, says main runway is 'most heavily utilized' in nation, Washington Business Journal (May 31, 2023), available at: <https://www.bizjournals.com/washington/news/2023/05/31/dca-flights-long-haul-congress-runway-mwaa.html>; see also Reagan National's Runway is Busiest In America, Metropolitan Washington Airports Authority (May 30, 2023), available at: <https://www.mwaa.com/news/reagan-nationals-runway-busiest-America>.



Delta brought its employees in from around the country to lobby Congress to pass the Direct Capital Access (DCA) Act,<sup>47</sup> and Delta continues to lead the Capital Access Alliance, whose spokesman attacked Virginia elected officials<sup>48</sup> for expressing concerns about DCA capacity and continues to advocate irresponsible expansion of DCA. With great irony, Delta has proposed its new flights to arrive at and depart from DCA – 4:00pm and 5:00pm (all local times) respectively – at times that even its mouthpiece the Capital Access Alliance states are not available at the airport.<sup>49</sup> The Department should proceed with skepticism when considering Delta’s claims about the consumer and community benefits of its proposal and take Delta’s expressions of concerns about DCA airport management with a grain of salt. Delta’s actions show it is anything but concerned about DCA congestion.

## **2. Delta’s Beyond-Perimeter Route Selection is Less Meritorious than United’s First- and Second-Choice Proposals**

Delta’s proposal to serve SEA should not be selected over United’s superior proposal to serve SFO. Delta’s focus on SEA for additional beyond-perimeter service, while understandable given that it is its primary West Coast hub, pales in comparison to United’s choice of the far more globally connected SFO. In terms of passenger demand by annual bookings, the numbers speak for themselves: United’s Washington, D.C. – San Francisco route is 1.4 times larger than Delta’s

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<sup>47</sup> See Delta Press Release (Jun. 22, 2023), <https://news.delta.com/delta-employees-advocate-modernizing-dca-perimeter-capitol-hill>.

<sup>48</sup> See *Up in the Air: Bil could add flights at DCA; some concerned about overcrowding* (May 10, 2024), available at <https://www.nbcwashington.com/news/local/up-in-the-air-bill-could-add-flights-at-dca-some-concerned-about-overcrowding/3613724/>

<sup>49</sup> See Memorandum at 3, Capital Access Alliance (Jun. 6, 2023), available at: <https://capitalaccessalliance.com/wp-content/uploads/2023/06/CAA-FAA-Interested-Parties-Memo-June-6.pdf>.

Washington, D.C. – Seattle route. *See* Exhibit UA-C109. Because each of these routes – DCA-SEA and DCA-SFO – has only two flights today, clearly United’s larger route of DCA-SFO, which is more underserved, will have a more positive impact than Delta’s proposal. While United’s proposal will provide round trip connections between DCA and 25 Western U.S. destinations via SFO, Delta has not provided any beyond-connectivity data. And, unlike United’s proposal, Delta’s DCA-SEA-DCA schedule does not provide any time-of-day enhancements for consumers compared to flight times offered by Alaska. *See* Exhibit UA-C132.

While United’s backup proposal provides new entrant competition on the DCA-LAX-DCA route, Delta proposes no competitive enhancements with its backup proposal for the DCA-SLC-DCA route. *See* Exhibit UA-C133.

Finally, Delta’s application has pages and pages of text congratulating itself on Delta’s operational metrics, awards, and employee programs. These may be important to Delta’s business objectives but none of them are decisional criteria for the Department in route case proceedings. The Department should prioritize applications and routes that hit the mark by maximizing connectivity and consumer options, and in this regard, United’s proposal clearly surpasses Delta’s.

**C. Southwest’s Application for LAS-DCA is Underwhelming and Should Not Be Selected Over United’s Application**

Similarly, Southwest’s application is a weak *gamble* compared to United’s strong application. In terms of passenger demand by annual bookings, the Washington, D.C. – San Francisco route is 1.2 times larger than the Washington, D.C. – Las Vegas route. *See* Exhibit UA-C108. Demand for SFO clearly *out-strips* that for LAS, making United’s proposal far more likely to maximize consumer benefits.

And as for Southwest's *gaming* this process by offering a through flight to/from Sacramento that really does nothing except potentially get a Californian excited for a flight to Washington National that really will be a flight first-to or last-from Nevada, contrary to Southwest's claims,<sup>50</sup> travel time on the DCA-LAS-SMF route is hardly an improvement over current one-stop alternatives for DCA-SMF by United; current options show the difference is not worth considering. *See* Exhibit UA-C129. There is no substantive difference between a "single plane" offering by Southwest and the many "one-stop" connections offered by United. The Department should not credit Southwest's attempt to portray their SMF service as "nonstop" or any attempt to claim that Sacramento satisfies the first Section 502 criteria – the Department should give equal weight to the competitive benefit of Southwest's "single plane" service and every other carrier's "one-stop" connections.

Finally, Southwest asserts that it will charge a \$188 fare for DCA-LAS travel, which is \$3 more than the average fare offered by Southwest today on a connecting basis and far lower than the Las Vegas fare offered by Southwest from Baltimore (BWI).<sup>51</sup> *See* Exhibit UA-C130. Southwest's claims are inconsistent with their current business practices – the most comparable route to Southwest's proposal, their BWI-LAS service, has fares that far exceed what would be predicted by Southwest's "Domestic Fare Curve." *See* Exhibit UA-C131. It is unbelievable that Southwest would do anything different than business as usual on DCA-LAS and charge a fare

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<sup>50</sup> *See* Southwest's Application at Exhibit WN-308.

<sup>51</sup> The Department cannot rely upon Southwest's pricing claim in this proceeding. For example, does Southwest commit – similar to pricing advertisements covered by 14 CFR 399.84 – to block sufficient seats at this price for the duration of its use of the slot? Does this price include taxes and fees? Are there no material restrictions to this fare (e.g., purchase-by-dates; travel-by-dates; round-trip-requirements; advanced purchase requirements)?

similar to what they charge today on BWI-LAS. Southwest's many claims on consumer benefits and stimulation are predicated on this unbelievable lower fare and should be given no weight in the Department's consideration. If making the benefits from these fare levels become the basis of an award to Southwest, the Department should periodically review to make sure Southwest is offering the fares they have promised and promptly rescind the award if they do not.

**D. American's Proposal Fails to Meet the Department's Criteria and its Proposed Primary Beyond-Perimeter Route SAT is Highly Inferior to SFO**

American is seemingly resting on its laurels rather than putting forth an application that shows it cares about service in the public interest. While American's proposed DCA-SAT proposal technically meets the first criterion outlined in the Notice, the Department should be wary of awarding American any slot exemptions based on its:

- large size at DCA;
- outsized holdings of beyond perimeter slots – six – or triple that of United's with service to three beyond-perimeter destinations versus United's two destinations; and
- partnership with Alaska which increases American's presence between DCA and the entire West Coast.

Granting additional slots to American would only serve to further solidify its presence at DCA, reducing the potential for competition, and potentially harming consumer choice. An award to American would be antithetical to the intentions of the FAA Reauthorization Act. Such an award would have a negative effect on competition in the DCA market by further cementing American's stronghold at DCA at the expense of competition. American already has the ability to serve SAT from any of its existing flexible DCA slots, which it has not done, despite having previously moved beyond perimeter slots from one U.S. point to another. The record notably lacks any mention of the consumer benefits for American's proposal.

Ironically, American falsely claims in its own application that United holds a “monopoly” on nonstop service between SAT and IAD or DCA,<sup>52</sup> conveniently ignoring the fact that United does not currently offer service between DCA and SAT. American, on the other hand, carries over a quarter of San Antonio passengers from Washington National, and United only has 11% share of the DCA-SAT booking demand. *See* Exhibit UA-C124. Moreover, unlike DCA, there are no restrictions on entry at IAD where United serves SAT. In sum, American could serve SAT from IAD or DCA if it was actually invested in the route and market. Instead, American has waited to initiate an additional SAT route until it came with the promise of valuable beyond perimeter slots to further enrich its holdings at DCA.

Additionally, SAT is not a leader in terms of passenger demand from DCA. It does not offer much in the way of beyond-connectivity, and its demand pales in comparison to SFO. Of note, United’s DCA-SFO route is 2.6 times larger than American’s proposed DCA-SAT route. *See* Exhibit UA-C111. And United’s proposal will provide round trip connections between DCA and 25 Western U.S. destinations via SFO, while American will provide San Antonio connections with only 12 Eastern U.S. destinations. *See* Exhibit UA-C104. Indeed, out of all primary routes applied for in this proceeding, the Washington National – San Antonio route represents the smallest route by passenger demand at 221,831 annual bookings. *See* Exhibit UA-C107. The Department should prioritize routes that offer robust connectivity and have higher levels of demand, ensuring that the awarded slots are used to their fullest potential to benefit the greatest number of travelers.

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<sup>52</sup> *See* American’s Application, at 3 (“As of June 2024, United Airlines has a monopoly as the only carrier operating any nonstop service from San Antonio to either IAD or DCA.”).

American's proposal should not be selected over United's simply because SAT does not currently have nonstop service. The Department's mission in this proceeding is to enhance competition and maximize consumer benefits, not to bolster American's competition position at DCA. American's proposal will have a net negative impact on the overall level of competition at DCA and should be judged accordingly.

### **CONCLUSION**

United has presented the strongest, most thoughtful, and evidence-backed application – for both its first- and second-choice proposals – in this proceeding and merits an award of two of the eight slot exemptions (one round trip) designated for non-limited incumbent carriers. The Department should remain steadfast and focused on the criteria in its Notice and, more broadly, on the public benefits that will stem from the award of new slot exemptions at DCA. In so doing, the Department should recognize that it is United's proposals that will truly maximize the use of these beyond-perimeter slot exemptions in the best possible way, *while also* simultaneously mitigating congestion at DCA. Other non-limited incumbent carriers have not demonstrated the strength of their proposals and how they best meet the Department's criteria. Regardless of how the Department allocates six of the eight slot exemptions for non-limited incumbents, United urges the Department to allocate two of them to the communities and consumers in California who demand, and indeed prefer, additional service to DCA.

WHEREFORE, United reiterates its request to the Department to grant it two slot exemptions for its first-choice proposal for Washington National – San Francisco service, or in the alternative, United’s second-choice proposal for Washington National – Los Angeles service, and such other relief that the Department may deem necessary or appropriate.

Respectfully submitted,



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July 17, 2024

# **EXHIBIT I**



**Before The  
Department Of Transportation**

**Slot Exemption Proceeding at Ronald  
Reagan Washington National Airport**

**DOT-OST-2024-0065**

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**Washington National - San Francisco (Primary)  
Washington National - Los Angeles (Back-Up)**

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**United Airlines Exhibits**

| <b>Exhibit Number</b> | <b>Slot Exemption Proceeding at Ronald Reagan Washington National Airport</b>   | <b>Page Count</b> |
|-----------------------|---|-------------------|
| UA-C100               | United Proposes A New Year-Round Washington National - San Francisco Flight   | 1                 |
| UA-C101               | United's New Washington National - San Francisco Flight Will Operate At Non-Congested Times At DCA And Will Provide Enhanced Time-Of-Day Coverage On The Route                                      | 1                 |
| UA-C102               | United's New Washington National - San Francisco Flight Will Provide Round Trip Connections To 25 Domestic And Seven International Destinations Served Behind San Francisco                         | 1                 |
| UA-C103               | The Proposed Washington National - San Francisco Flight Provides New Round Trip And Additional Connecting Opportunities To/From DCA   | 2                 |
| UA-C104               | United's Proposal Will Provide Round Trip Connections Between DCA And 25 Western U.S. Destinations Via SFO Compared To American Providing San Antonio Connections With 12 Eastern U.S. Destinations | 1                 |
| UA-C105               | United's Proposal Will Provide Round Trip Connections Between DCA And 25 Western U.S. Destinations Via SFO Compared To Southwest's LAS Proposal With 20 Same Day Round Trip Connections             | 1                 |
| UA-C106               | United's Proposal Will Provide Round Trip Connections Between DCA And 25 Western U.S. Destinations Via SFO Compared To JetBlue's SJU Proposal With Zero Same Day Round Trip Connections             | 1                 |

| <b>Exhibit Number</b> | <b>Slot Exemption Proceeding at Ronald Reagan Washington National Airport</b>  | <b>Page Count</b> |
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| UA-C107               | The Washington D.C. - San Francisco Route Is The Largest Route Filed For Primary Consideration Among Non-Limited Incumbents, And Has The Second Highest Demand Per DCA Seats | 1                 |
| UA-C108               | The Washington National - San Francisco Route Is 1.2 Times Larger Than Southwest's Proposed DCA - Las Vegas Route  | 1                 |
| UA-C109               | The Washington National - San Francisco Route Is 1.4 Times Larger Than Delta's Proposed DCA - Seattle Route  | 1                 |
| UA-C110               | The Washington National - San Francisco Route Is 2.0 Times Larger Than JetBlue's Proposed DCA - San Juan Route   | 1                 |
| UA-C111               | The Washington National - San Francisco Route Is 2.6 Times Larger Than American's Proposed DCA - San Antonio Route   | 1                 |
| UA-C112               | The Washington National - San Francisco Route Serves The Largest U.S. Metropolitan Area Of All Primary Routes Under Consideration In This Proceeding                         | 1                 |
| UA-C113               | United's Back Up Proposal Is A First-Ever For United Washington National - Los Angeles Flight  | 1                 |
| UA-C114               | United's Washington National - Los Angeles Flight Will Operate At Non-Congested Times At DCA   | 1                 |
| UA-C115               | United's Washington National - Los Angeles Flight Will Provide A Competitive Alternative To The Three Incumbent Airlines Which Operate A Total Of Four Daily Departures      | 1                 |

| <b>Exhibit Number</b> | <b>Slot Exemption Proceeding at Ronald Reagan Washington National Airport</b>   | <b>Page Count</b> |
|-----------------------|---|-------------------|
| UA-C116               | The Washington National - Los Angeles Route Is The Largest Beyond Perimeter Route From The Washington, D.C. Area Totaling 865,000 Annual Bookings                               | 1                 |
| UA-C117               | The Washington National - Los Angeles Route Serves The Largest U.S. Metropolitan Area Of All Routes Under Consideration In This Proceeding                                      | 1                 |
| UA-C118               | United Is The Fifth Largest Carrier At Washington National In Terms Of Annual Seats (7% Share) And Destinations Served (Five Cities) And Is Fourth Largest In Daily Departures  | 1                 |
| UA-C119               | United Is One Of Two Smallest Carriers Between Washington National And California In Terms Of Annual Seats And United Operates One Departure To One California City             | 1                 |
| UA-C120               | United Is One Of Two Smallest Carriers Between Washington National And The West Coast In Terms Of Annual Seats And United Operates One Departure To One City                    | 1                 |
| UA-C121               | United Offers Multiple Examples Of Additional United Capacity On A Route Leading To Reduced Fares Between 11% And 26%   | 1                 |
| UA-C122               | All Beyond Perimeter Flights Are Within A Range Of 86% To 91% Load Factor, Thus No Current Route Performs As An Outlier   | 1                 |
| UA-C123               | United's Proposed Flights Are Scheduled In Non-Congested Hours According To FAA Guidance  | 1                 |
| UA-C124               | Of All Non-Limited Incumbent Carriers, JetBlue Has The Highest Share Of DCA Demand To/From Its Proposed Gateway - 81% - And Thus Limiting The Benefits Of More DCA - SJU Flying | 2                 |

| <b>Exhibit Number</b> | <b>Slot Exemption Proceeding at Ronald Reagan Washington National Airport</b>  | <b>Page Count</b> |
|-----------------------|--|-------------------|
| UA-C125               | United Does Not Find Evidence To Support The JetBlue Claim That Its Proposed Second DCA - SJU Flight Will Lower Fares By 30%   | 1                 |
| UA-C126               | Data Does Not Support JetBlue Claims About Lowered Average Fares On The DCA - San Juan Route Since JetBlue Entered   | 1                 |
| UA-C127               | JetBlue Boasts Connecting Opportunities To/From Seven Destinations Beyond SJU, Yet Only A Single One-Way, Same Day Connection Is Available With JetBlue's Proposed Schedule                            | 1                 |
| UA-C128               | In Considering Back-Up Proposals For DCA-LAX, United Is Investing In LAX Whereas JetBlue Is Retreating Significantly With A 24% Reduction In Departures 2024 Vs 2023                                   | 1                 |
| UA-C129               | Southwest Alleged Travel Time Improvements From DCA To Sacramento Via LAS Are Hardly An Improvement From United Single Connect Options For Washington National - Sacramento Travelers                  | 1                 |
| UA-C130               | Southwest Proposes A \$188 Average Fare For DCA - LAS Travelers, Which Is \$3 More Than The Current Fare Available By Southwest At \$185 And Substantially Less Than Southwest's BWI-LAX Fare At \$243 | 1                 |
| UA-C131               | Southwest's BWI-LAS Flight Is Priced \$54 Higher Than What Is Predicted By Southwest's "Domestic Fare Curve" Thus A DCA-LAS Fare Of \$188 Is Highly Doubtful   | 1                 |
| UA-C132               | Unlike United's Proposal, Delta's DCA-SEA-DCA Schedule Does Not Provide Any Time-Of-Day Enhancements For Consumers Compared To Flight Times Offered By Alaska  | 1                 |

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| Exhibit<br>Number | Slot Exemption Proceeding at Ronald Reagan Washington<br>National Airport  | Page<br>Count |
|-------------------|--|---------------|
| UA-C133           | United's Backup Proposal Provides New Entrant Competition On<br>The DCA-LAX-DCA Route Whereas Delta Proposes No<br>Competitive Enhancements With Its Backup Proposal DCA-SLC-<br>DCA | 1             |

# United Proposes A New Year-Round Washington National - San Francisco Flight

## United's Current And Proposed Washington National (DCA) Service



| Current Routes |                         |
|----------------|-------------------------|
| DCA:           | EWR, ORD, IAH, DEN, SFO |



# United's New Washington National - San Francisco Flight Will Operate At Non-Congested Times At DCA And Will Provide Enhanced Time-Of-Day Coverage On The Route

## Proposed DCA-SFO-DCA Schedule

|   |           |               |          |               |           |   | Proposed Frequency |
|---|-----------|---------------|----------|---------------|-----------|---|--------------------|
| Carrier   | Equipment | SFO Dep. Time | DCA Time | SFO Arr. Time | Equipment | Carrier   |                    |
|   |           |               | 6:30     | 9:21          | MAX 8     |  |                    |
|  | 737-800   | 8:00          | 16:10    |               |           |   |                    |
|  | MAX 8     | 8:43          | 17:00    |               |           |   |                    |
|   |           |               | 17:10    | 20:11         | 737-800   |  |                    |
|   |           |               | 18:02    | 20:54         | MAX 8     |  |                    |
|  | MAX 8     | 13:00         | 21:19    |               |           |   |                    |

United's proposed new flight will depart SFO over four hours later than United's current morning departure, and will be the only afternoon departure from SFO to DCA

United's proposed new flight will depart DCA in the morning nearly 12 hours earlier in the day than United's current evening departure, and will be the only morning departure from DCA to SFO





# United's New Washington National - San Francisco Flight Will Provide Round Trip Connections To 25 Domestic And Seven International Destinations Served Behind San Francisco

## DCA-SFO-DCA Roundtrip Connections

### Domestic

| Destination     | Connect Time |      | Destination   | Connect Time |      |
|-----------------|--------------|------|---------------|--------------|------|
|                 | West         | East |               | West         | East |
| San Luis Obispo | 1:45         | 5:52 | San Diego     | 1:50         | 0:48 |
| Sacramento      | 3:33         | 1:52 | Orange County | 1:18         | 0:53 |
| Bakersfield     | 1:43         | 5:49 | Phoenix       | 1:48         | 0:53 |
| Reno            | 4:38         | 1:05 | Burbank       | 1:25         | 0:41 |
| Medford         | 1:18         | 5:37 | Fresno        | 1:58         | 4:27 |
| Los Angeles     | 1:48         | 1:17 | Spokane       | 3:33         | 4:15 |
| Santa Barbara   | 1:28         | 0:42 | Ontario       | 2:16         | 0:40 |
| Arcata/Eureka   | 1:18         | 5:29 | Eugene        | 1:13         | 4:09 |
| Las Vegas       | 1:46         | 0:44 | Seattle       | 1:13         | 1:11 |
| Bend/Redmond    | 1:21         | 5:17 | Monterey      | 3:33         | 3:42 |
| Boise           | 4:08         | 3:16 | Pasco         | 1:13         | 3:38 |
| Portland        | 1:33         | 0:46 | Palm Springs  | 3:34         | 3:10 |
| Salt Lake City  | 5:08         | 2:16 |               |              |      |

### International

| Destination | Connect Time |      |
|-------------|--------------|------|
|             | West         | East |
| Taipei      | 5:08         | 4:15 |
| Hong Kong   | 3:53         | 4:05 |
| Singapore   | 1:43         | 3:45 |
| Vancouver   | 1:27         | 3:36 |
| Tokyo – NRT | 2:23         | 2:30 |
| Osaka       | 1:28         | 2:00 |
| Tokyo – HND | 1:18         | 1:30 |

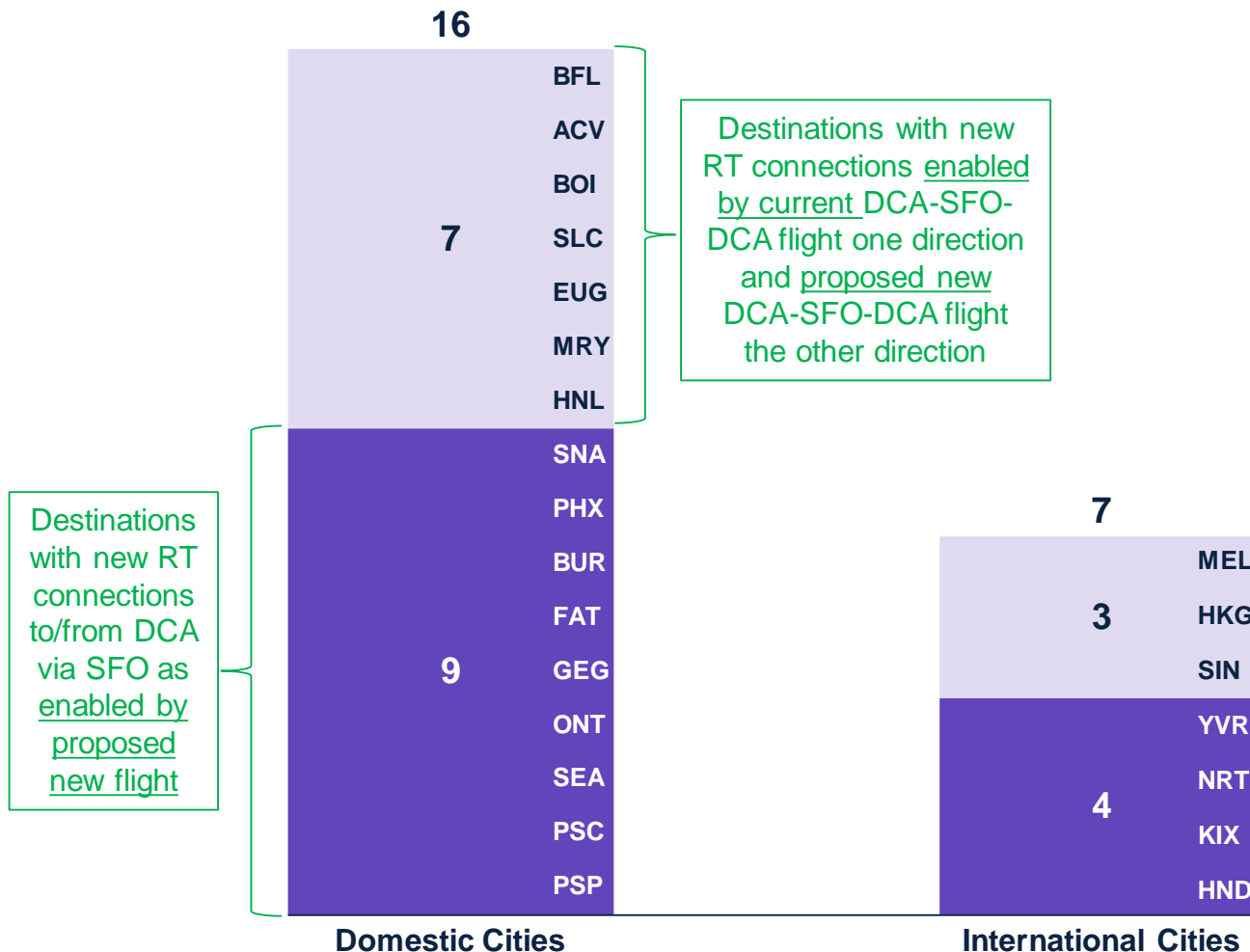


Note: Based on 6:30W/13:00E DCA-SFO-DCA depart times. Filtered for circuitry. Proposed schedule may vary by day of week, month, or season, depending on slot availability and/or operational constraints

Source: OAG October 2024 peak day schedule, United proposal in this proceeding

# The Proposed Washington National - San Francisco Flight Provides New Round Trip And Additional Connecting Opportunities To/From DCA

## Round Trip Connections Enabled By A New United DCA-SFO-DCA Flight

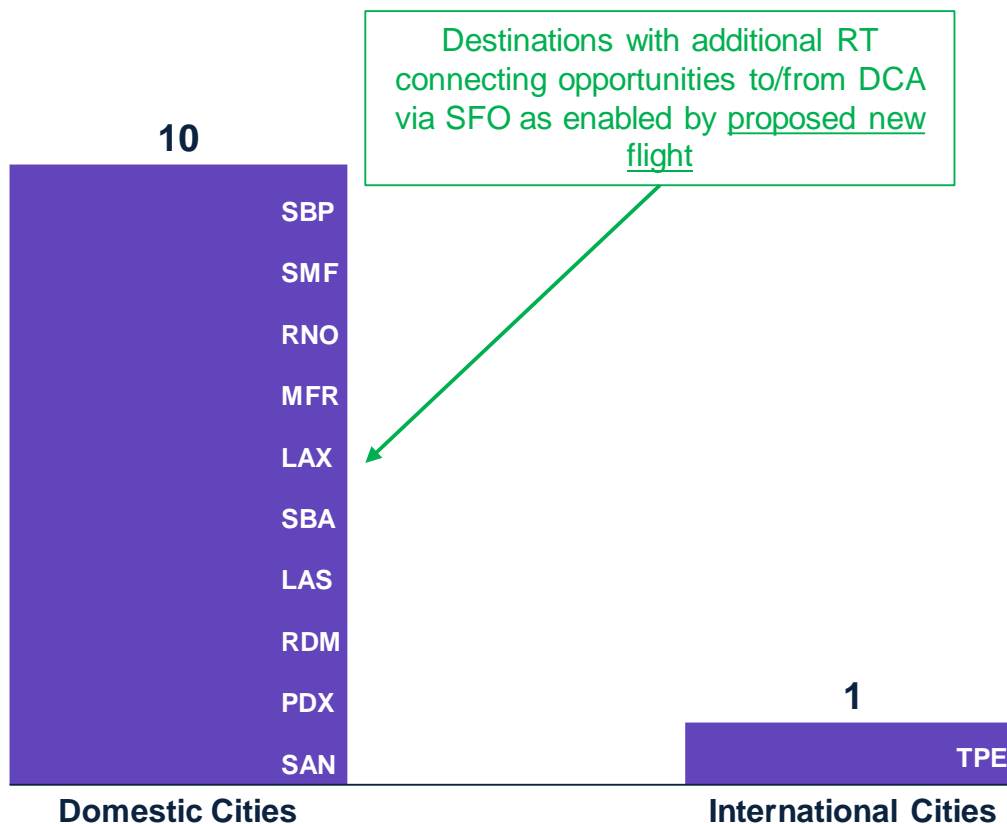


10 Note: Based on 6:30W/13:00E DCA-SFO-DCA depart times. Filtered for circuitry  
 Source: OAG October 2024 peak day schedule, United proposal in this proceeding



# The Proposed Washington National - San Francisco Flight Provides New Round Trip And Additional Connecting Opportunities To/From DCA

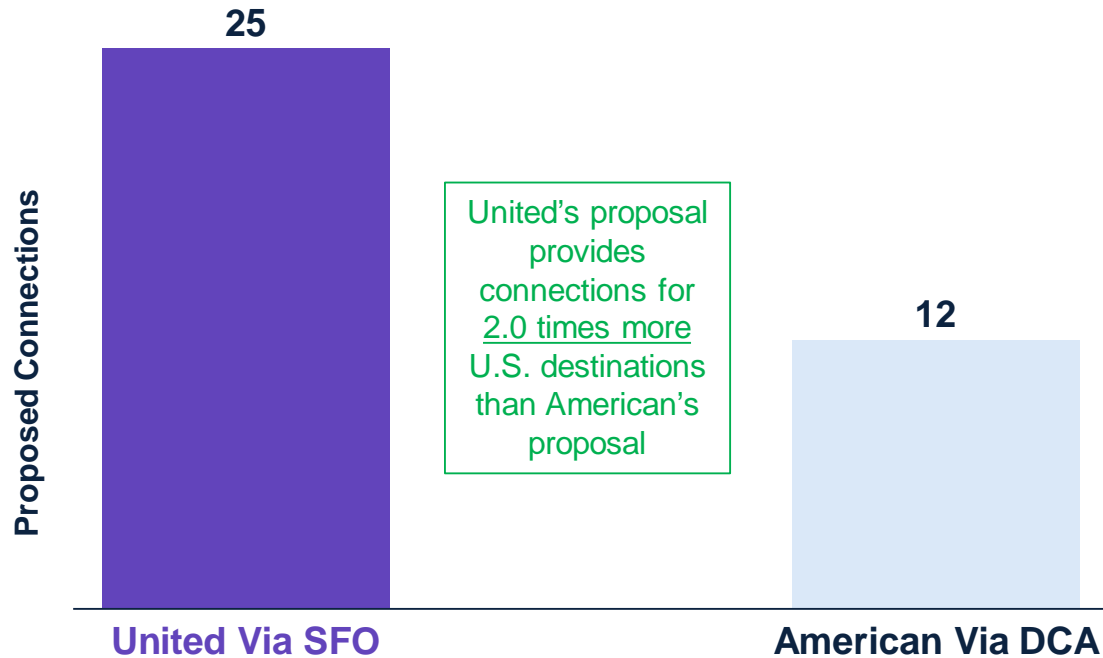
## Additional Connections To/From DCA At Ten U.S. Destinations



11 Note: Based on 6:30W/13:00E DCA-SFO-DCA depart times. Filtered for circuitry  
 Source: OAG October 2024 peak day schedule, United proposal in this proceeding

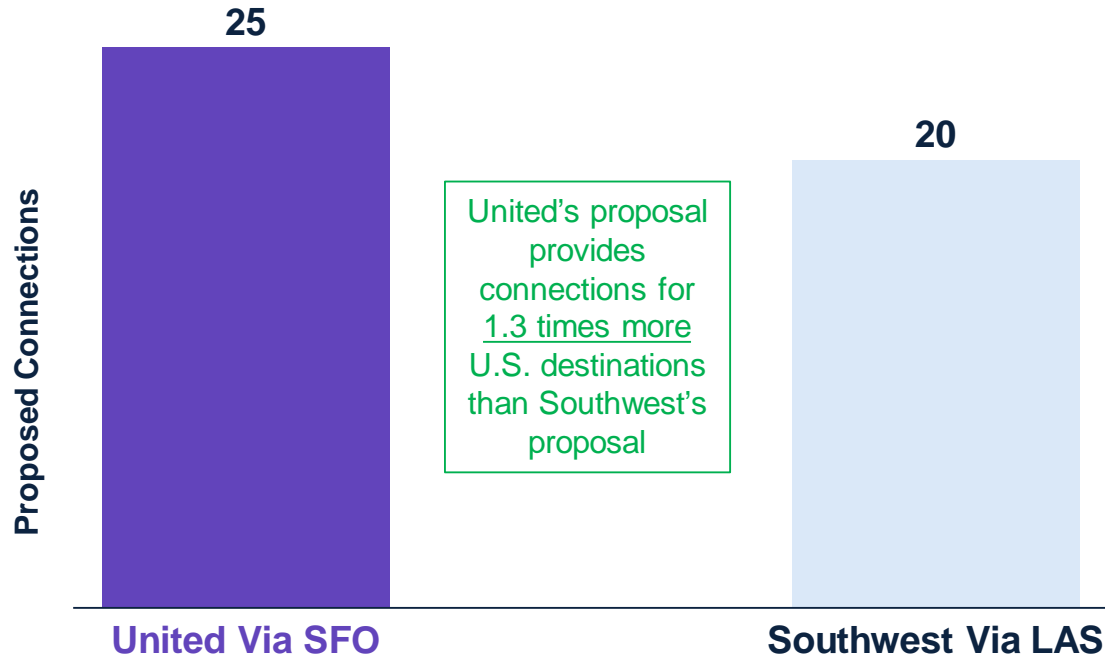
# United's Proposal Will Provide Round Trip Connections Between DCA And 25 Western U.S. Destinations Via SFO Compared To American Providing San Antonio Connections With 12 Eastern U.S. Destinations

## Same Day Round Trip Connection Comparisons



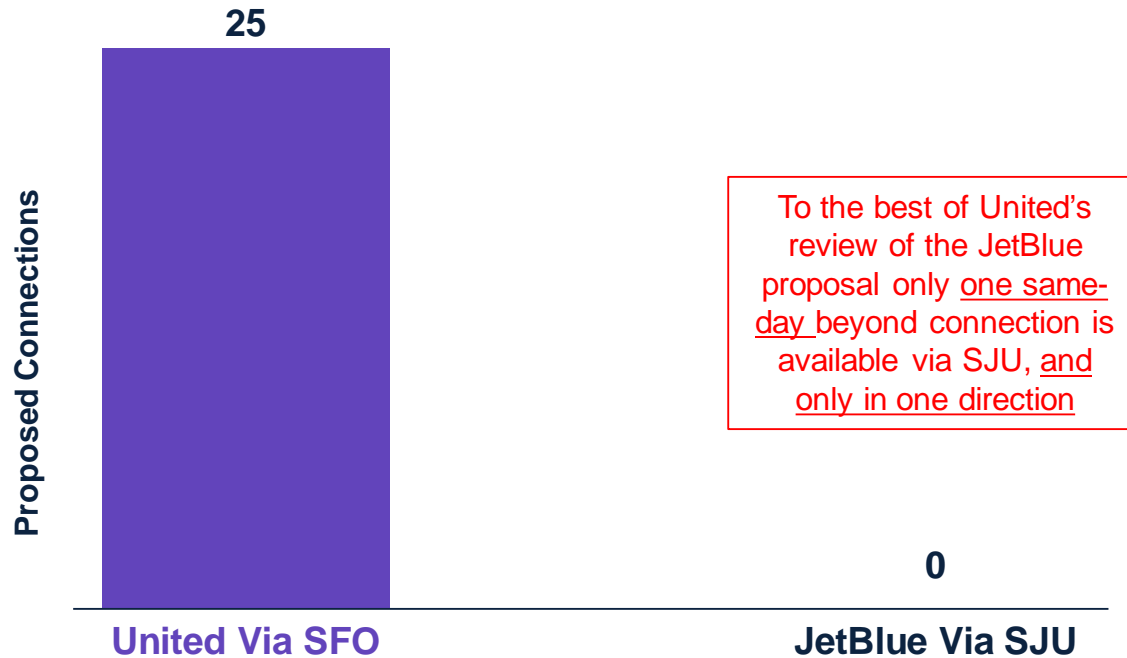
# United's Proposal Will Provide Round Trip Connections Between DCA And 25 Western U.S. Destinations Via SFO Compared To Southwest's LAS Proposal With 20 Same Day Round Trip Connections

## Same Day Round Trip Connection Comparisons



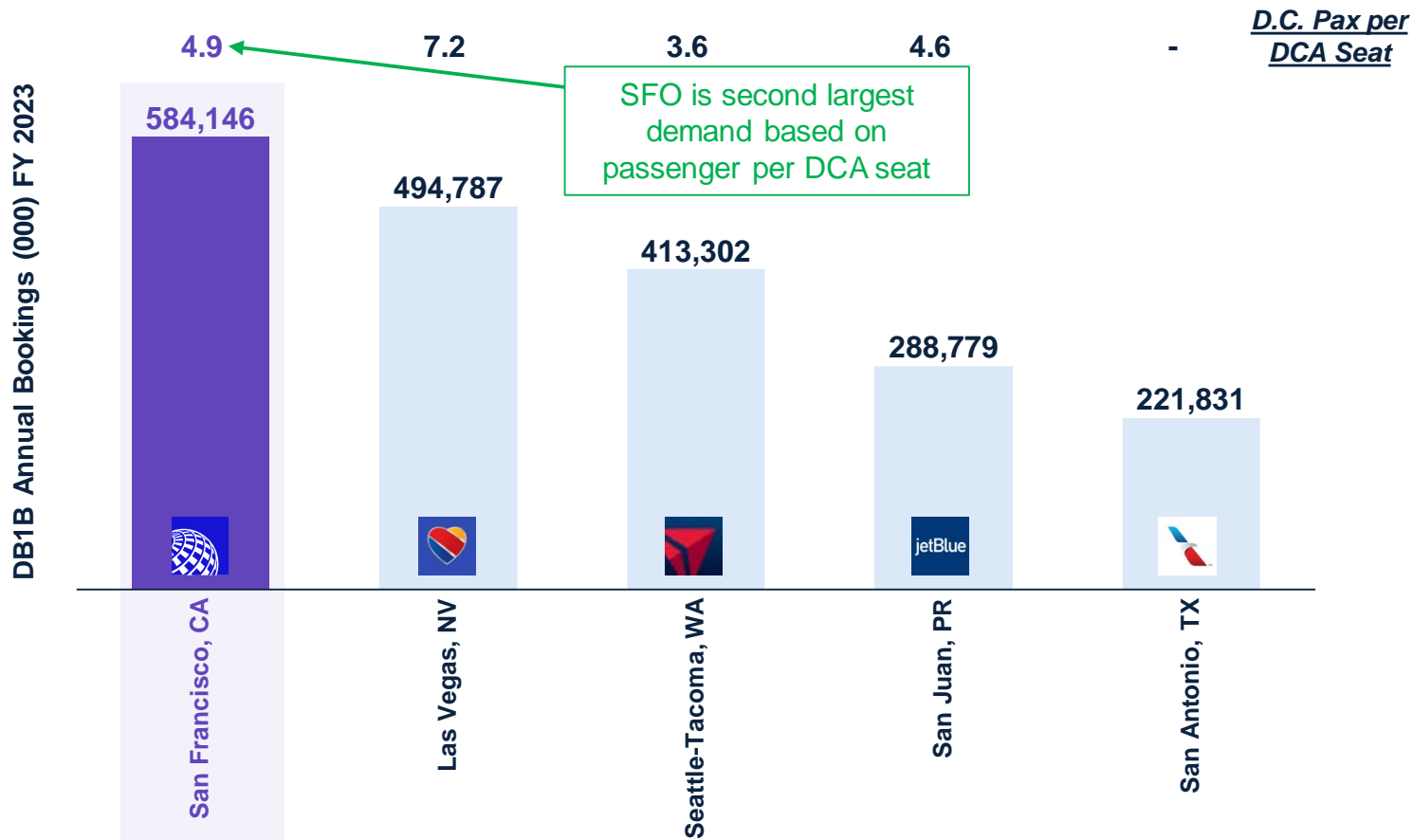
# United's Proposal Will Provide Round Trip Connections Between DCA And 25 Western U.S. Destinations Via SFO Compared To JetBlue's SJU Proposal With Zero Same Day Round Trip Connections

## Same Day Round Trip Connection Comparisons



# The Washington D.C. - San Francisco Route Is The Largest Route Filed For Primary Consideration Among Non-Limited Incumbents, And Has The Second Highest Demand Per DCA Seats

## Washington, D.C. Area Booking Demand For Destinations Included In This Proceeding

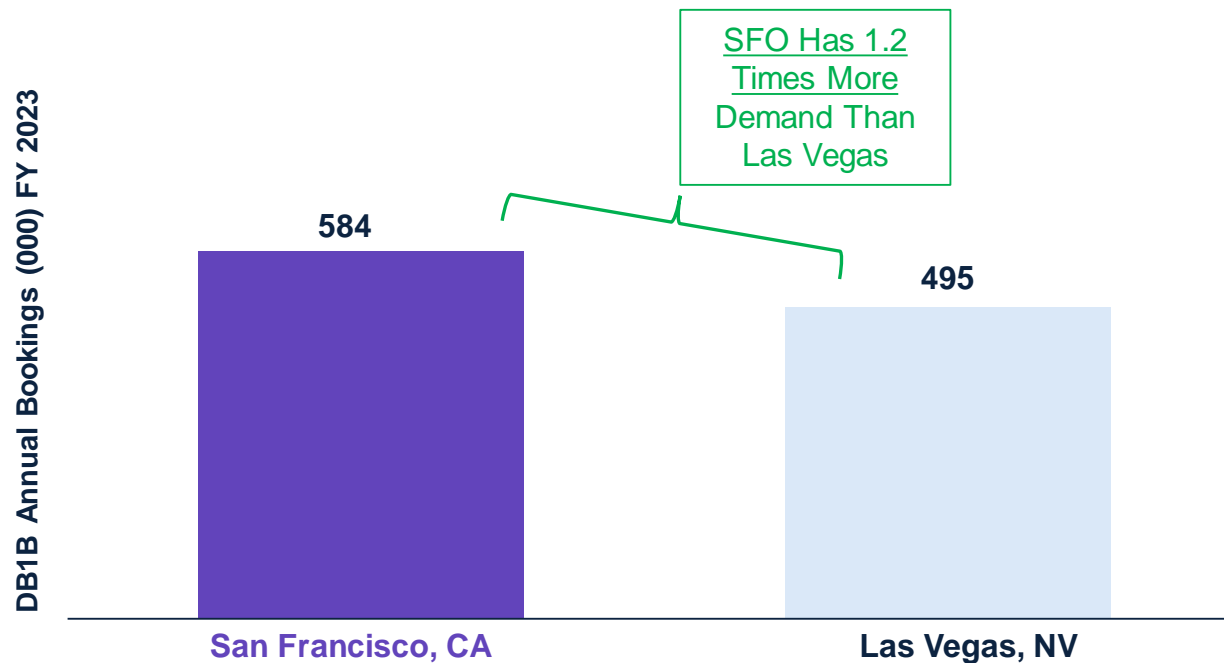


Note: "Washington, D.C." includes DCA, IAD, BWI. Seat = non-stop departing seats from DCA. Assumes FY 2023 passengers (PAX) divided by existing DCA FY 2023 seats  
 Source: DB1B annual booking FY 2023, nondirectional average



## The Washington National - San Francisco Route Is 1.2 Times Larger Than Southwest's Proposed DCA - Las Vegas Route

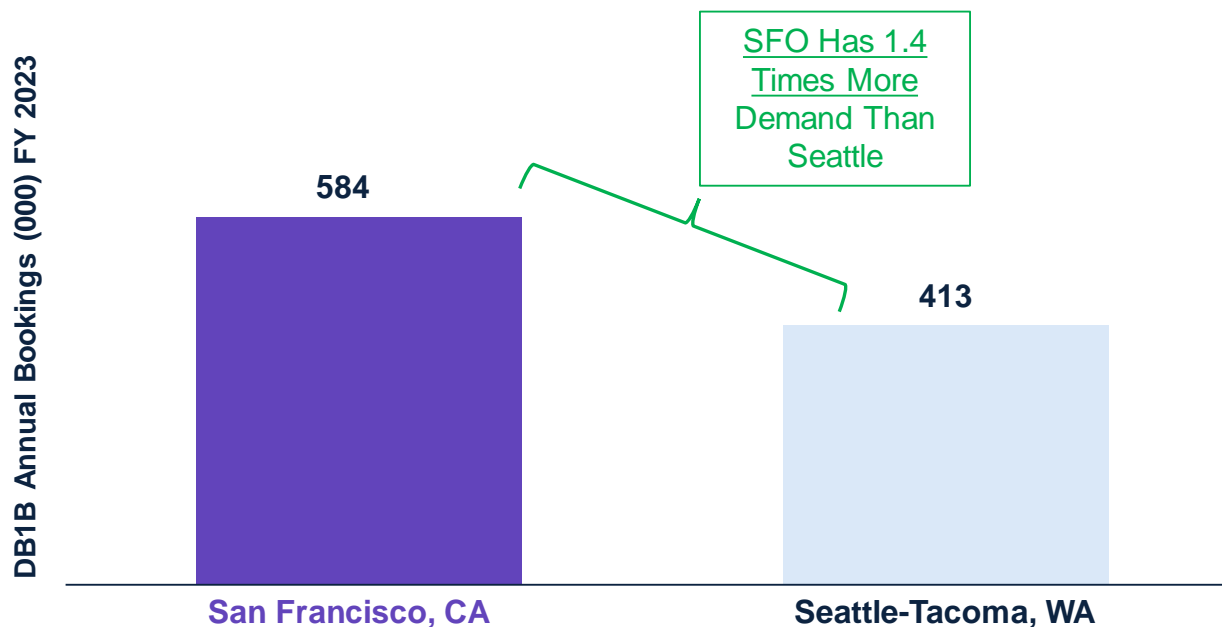
### Washington, D.C. Area Booking Demand For Destinations Included In This Proceeding





## The Washington National - San Francisco Route Is 1.4 Times Larger Than Delta's Proposed DCA - Seattle Route

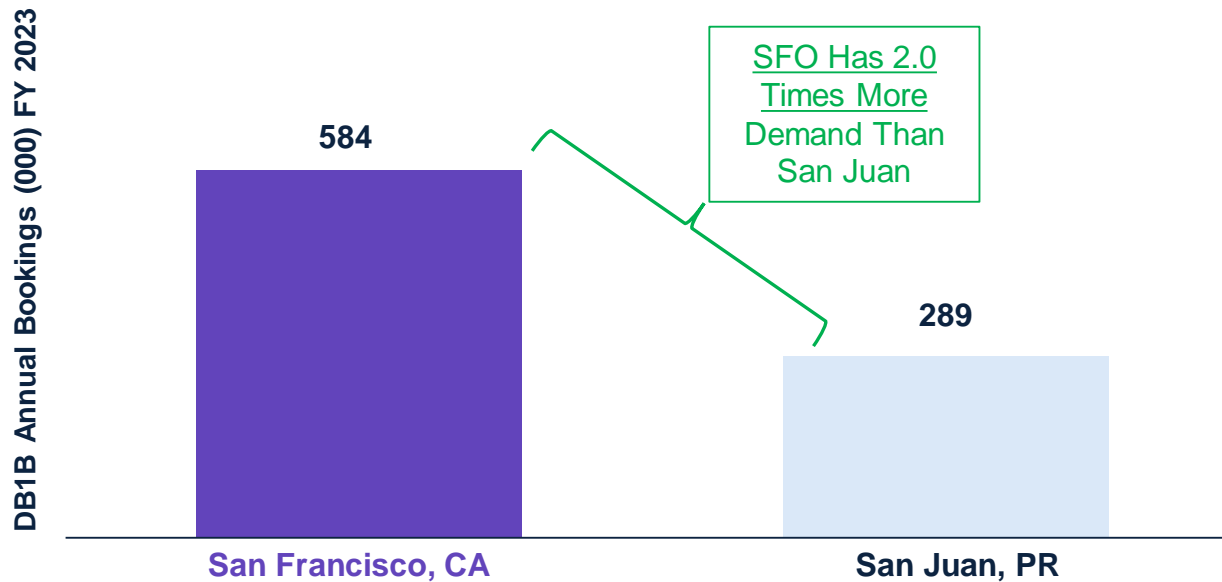
### Washington, D.C. Area Booking Demand For Destinations Included In This Proceeding



17 Note: "Washington, D.C." includes DCA, IAD, BWI  
Source: DB1B annual booking FY 2023, nondirectional average

## The Washington National - San Francisco Route Is 2.0 Times Larger Than JetBlue's Proposed DCA - San Juan Route

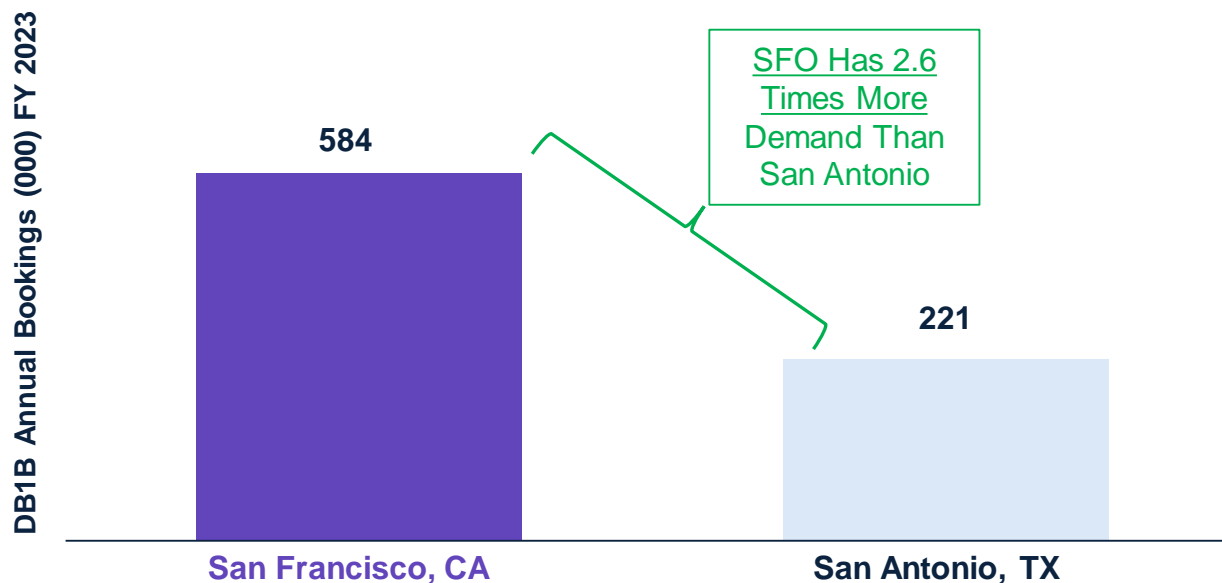
### Washington, D.C. Area Booking Demand For Destinations Included In This Proceeding



18 Note: "Washington, D.C." includes DCA, IAD, BWI  
Source: DB1B annual booking FY 2023, nondirectional average

## The Washington National - San Francisco Route Is 2.6 Times Larger Than American's Proposed DCA - San Antonio Route

### Washington, D.C. Area Booking Demand For Destinations Included In This Proceeding



19 Note: "Washington, D.C." includes DCA, IAD, BWI  
Source: DB1B annual booking FY 2023, nondirectional average

# The Washington National - San Francisco Route Serves The Largest U.S. Metropolitan Area Of All Primary Routes Under Consideration In This Proceeding

## Metropolitan Statistical Areas Of All Primary Routes Under Consideration For New Washington National Service

| <u>U.S. Metropolitan Area</u>                  | <u>Population MM (07/01/23)</u> | <u>Departures to DCA</u> |
|--|---------------------------------|--------------------------|
| 1) Los Angeles/Long Beach/Anaheim <sup>1</sup> | 12.9                            | 4/Day                    |
| <b>2) San Francisco/Oakland/Freemont</b>       | <b>4.6</b>                      | <b>2/Day</b>             |
| 3) Seattle/Tacoma/Bellevue                     | 4.0                             | 2/Day                    |
| 4) San Diego/Chula Vista/Carlsbad              | 3.3                             | 0/Day                    |
| 5) San Antonio/New Braunfels                   | 2.7                             | 0/Day                    |
| 6) Las Vegas/Henderson/North Las Vegas         | 2.3                             | 1/Day                    |
| 7) San Juan/Bayamon/Caguas                     | 2.0                             | 1/Day                    |

1. Los Angeles is United's back-up proposal

Source: Annual estimates of the resident population for Metropolitan Statistical Areas in the United States and Puerto Rico – July 1, 2023. List of cities based upon publicly announced plans by other airlines for this proceeding. OAG June 2024











20 Note: DCA departures includes: Los Angeles: AA 2, AS 1, DL 1. San Francisco: AS 1, UA 1. Seattle: AS 2. Las Vegas: AA 1, San Juan: B6 1

# United's Back Up Proposal Is A First-Ever For United Washington National - Los Angeles Flight

## United's Current And Proposed Washington National Service

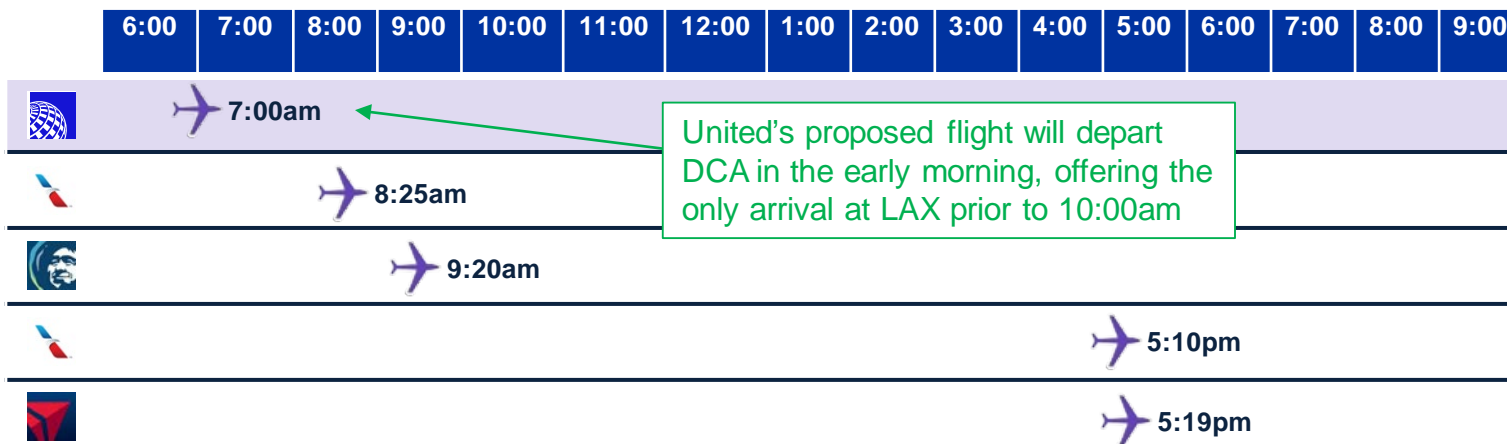


# United's Washington National - Los Angeles Flight Will Operate At Non-Congested Times At DCA

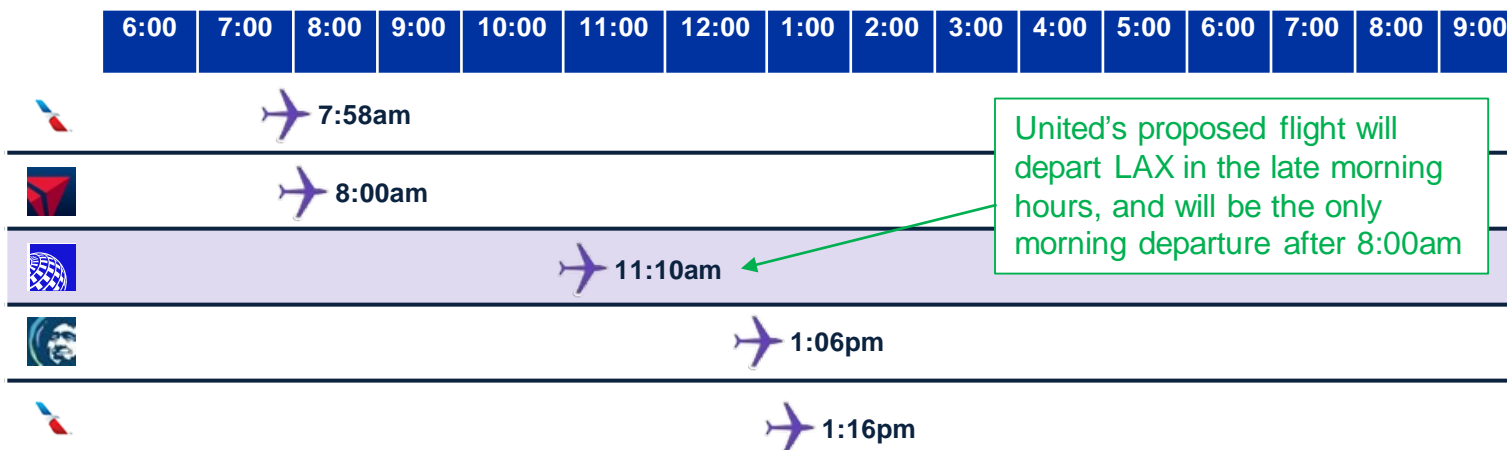
| Carrier   | Equipment | LAX Dep. Time | DCA Time | LAX Arr. Time | Equipment | Carrier   |
|---|-----------|---------------|----------|---------------|-----------|---|
|   |           |               | 7:00     | 9:27          | MAX 8     |  |
|   |           |               | 8:25     | 11:06         | A321neo   |  |
|   |           |               | 9:20     | 12:05         | 737-800   |  |
|  | A321neo   | 7:58          | 15:57    |               |           |   |
|  | 757-200   | 8:00          | 16:03    |               |           |   |
|   |           |               | 17:20    | 20:11         | A321neo   |  |
|   |           |               | 17:25    | 20:19         | 757-200   |  |
|  | MAX 8     | 11:10         | 19:20    |               |           |   |
|  | MAX 8     | 13:06         | 20:59    |               |           |   |
|  | 321neo    | 13:16         | 21:14    |               |           |   |

# United's Washington National - Los Angeles Flight Will Provide A Competitive Alternative To The Three Incumbent Airlines Which Operate A Total Of Four Daily Departures

## DCA-LAX Westbound

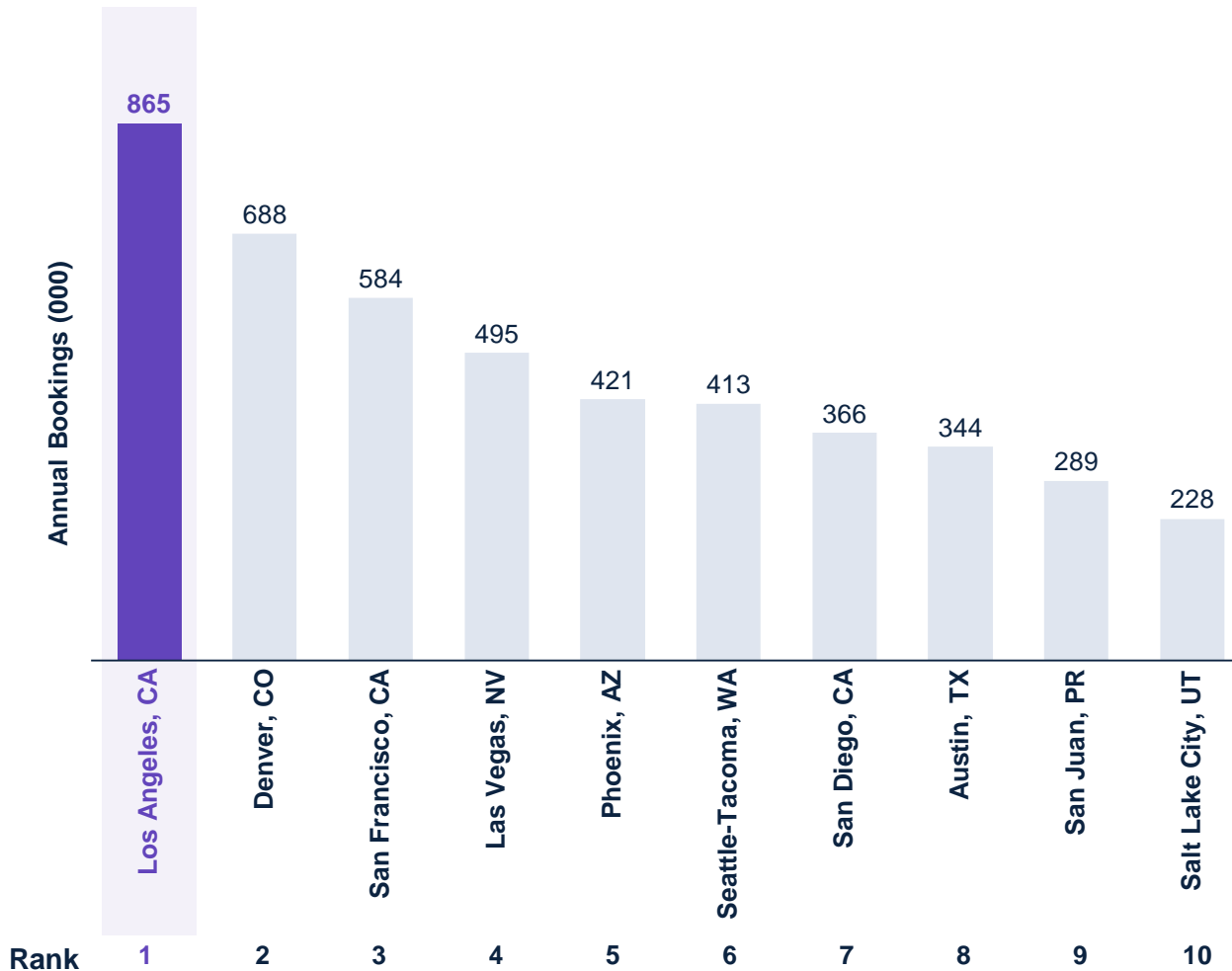


## LAX-DCA Eastbound



# The Washington National - Los Angeles Route Is The Largest Beyond Perimeter Route From The Washington, D.C. Area Totaling 865,000 Annual Bookings

## Rank Of Washington, D.C. Area Booking Demand For Beyond Perimeter Destinations



24 Note: "Washington, D.C." includes DCA, IAD, BWI  
Source: DB1B annual booking FY 2023, nondirectional average





# The Washington National - Los Angeles Route Serves The Largest U.S. Metropolitan Area Of All Routes Under Consideration In This Proceeding

## Metropolitan Statistical Areas Of All Routes Under Consideration For New Washington National Service

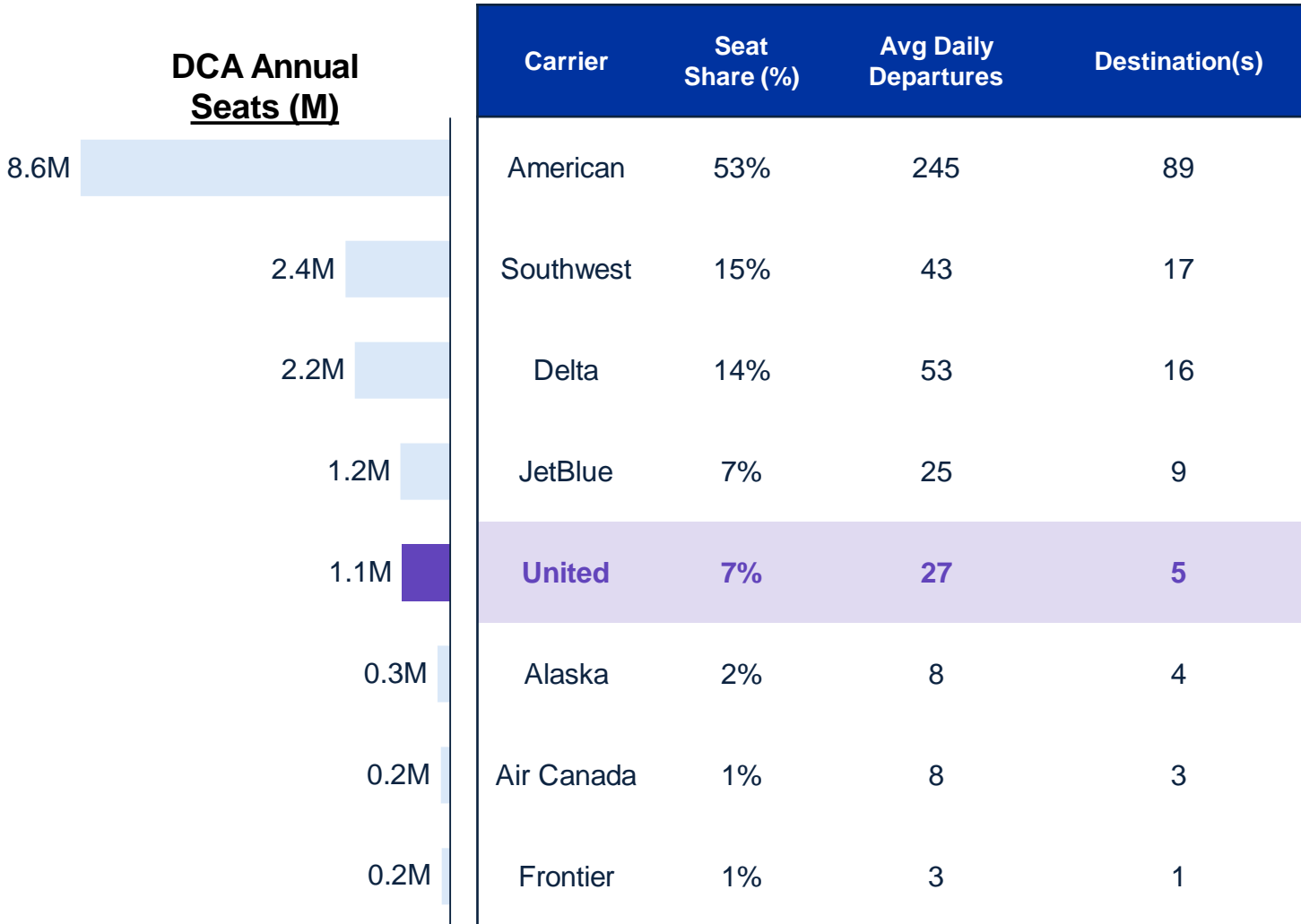
| <u>U.S. Metropolitan Area</u>                  | <u>Population MM (07/01/23)</u> | <u>Departures to DCA</u> |
|--|---------------------------------|--------------------------|
| 1) Los Angeles/Long Beach/Anaheim <sup>1</sup> | 12.9                            | 4/Day                    |
| 2) San Francisco/Oakland/Fremont               | 4.6                             | 2/Day                    |
| 3) Seattle/Tacoma/Bellevue                     | 4.0                             | 2/Day                    |
| 4) San Diego/Chula Vista/Carlsbad              | 3.3                             | 0/Day                    |
| 5) San Antonio/New Braunfels                   | 2.7                             | 0/Day                    |
| 6) Las Vegas/Henderson/North Las Vegas         | 2.3                             | 1/Day                    |
| 7) San Juan/Bayamon/Caguas                     | 2.0                             | 1/Day                    |
| 8) Salt Lake City/Murray                       | 1.3                             | 1/Day                    |

1. Los Angeles is United's back-up proposal

Source: Annual estimates of the resident population for Metropolitan Statistical Areas in the United States and Puerto Rico – July 1, 2023. List of cities based upon publicly announced plans by other airlines for this proceeding. OAG June 2024

25 Note: DCA departures includes: Los Angeles: AA 2, AS 1, DL 1. San Francisco: AS 1, UA 1. Seattle: AS 2. Las Vegas: AA 1, San Juan: B6 1

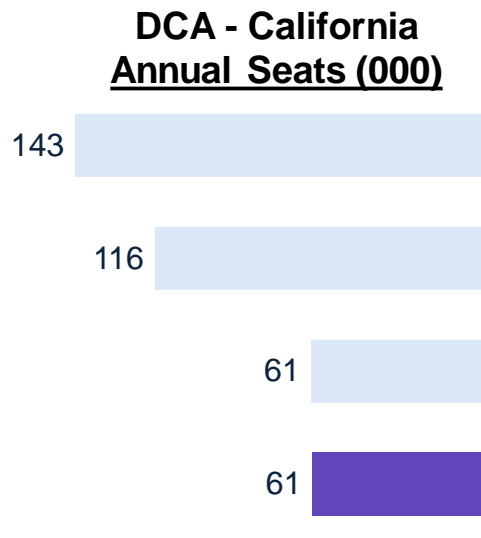
# United Is The Fifth Largest Carrier At Washington National In Terms Of Annual Seats (7% Share) And Destinations Served (Five Cities) And Is Fourth Largest In Daily Departures



26 Note: Only destinations flown with more than 0.1 weekly flights included  
Source: OAG Full Year 2024



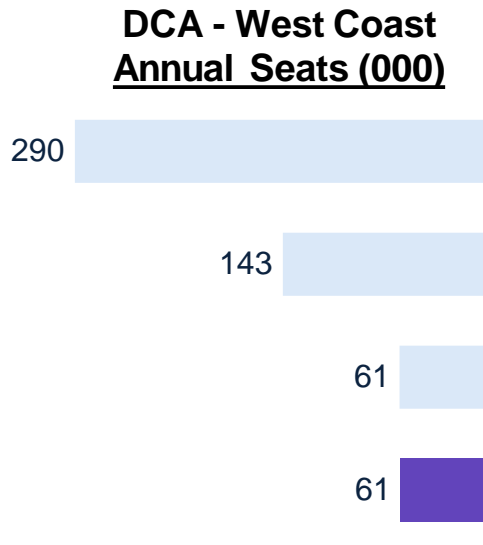
# United Is One Of Two Smallest Carriers Between Washington National And California In Terms Of Annual Seats And United Operates One Departure To One California City



| Carrier  | Seat Share (%) | Avg Daily Departures | Destination(s) |
|----------|----------------|----------------------|----------------|
| American | 38%            | 2                    | LAX            |
| Alaska   | 30%            | 2                    | LAX,SFO        |
| Delta    | 16%            | 1                    | LAX            |
| United   | 16%            | 1                    | SFO            |

*United's seat count and share slightly below Delta's*

# United Is One Of Two Smallest Carriers Between Washington National And The West Coast In Terms Of Annual Seats And United Operates One Departure To One City



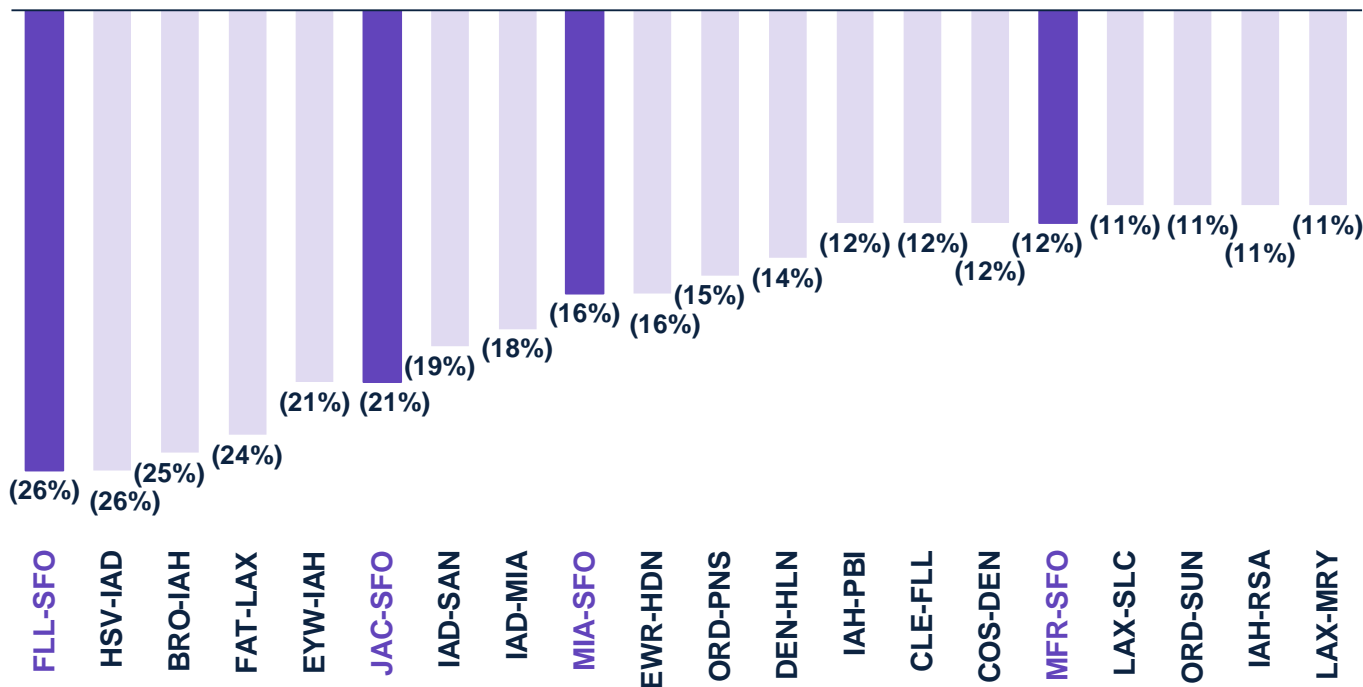
| Carrier       | Seat Share (%) | Avg Daily Departures | Destination(s)     |
|---------------|----------------|----------------------|--------------------|
| Alaska        | 52%            | 5                    | LAX, SFO, PDX, SEA |
| American      | 26%            | 2                    | LAX                |
| Delta         | 11%            | 1                    | LAX                |
| <b>United</b> | <b>11%</b>     | <b>1</b>             | <b>SFO</b>         |

*United's seat count and share slightly below Delta's*



## United Offers Multiple Examples Of Additional United Capacity On A Route Leading To Reduced Fares Between 11% And 26%

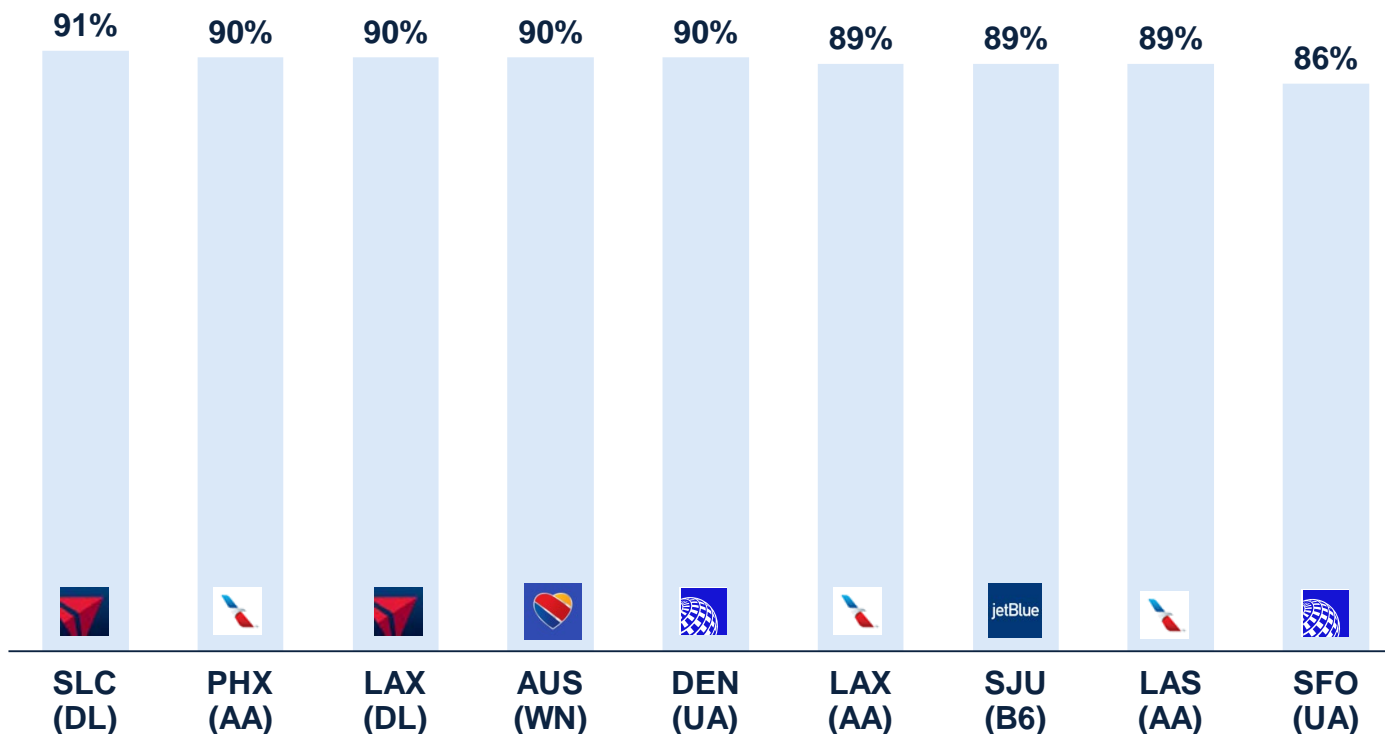
### 1Q24 vs 1Q23 O&D Fares For Routes With 50% Or More United Seats Year Over Year



*United's San Francisco flights highlighted*

## All Beyond Perimeter Flights Are Within A Range Of 86% To 91% Load Factor, Thus No Current Route Performs As An Outlier

### Beyond Perimeter Flights Load Factors For Non-Limited Incumbent Carriers



## United's Proposed Flights Are Scheduled In Non-Congested Hours According To FAA Guidance

### Primary Proposals - DCA Schedule Times

| Carrier | Proposal | DCA Arr. Time | DCA Dep. Time | Operations Available? |
|---------|----------|---------------|---------------|-----------------------|
| UA      | SFO      | 21:19         | 06:30         | ✓                     |
| AA      | SAT      | 10:59         | 19:45         | ✓                     |
| B6      | SJU      | 12:50         | 14:00         | ✓                     |
| WN      | LAS      | 16:45         | 16:25         | ✗                     |
| DL      | SEA      | 16:00         | 17:00         | ✗                     |

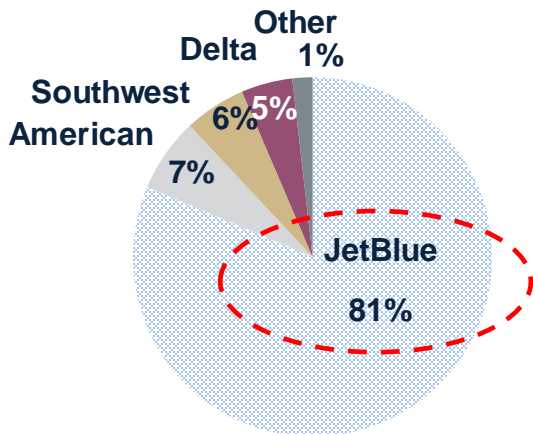
### Backup Proposals - DCA Schedule Times

| Carrier | Proposal | DCA Arr. Time                           | DCA Dep. Time | Operations Available? |
|---------|----------|---|---------------|-----------------------|
| UA      | LAX      | 19:20                                   | 07:00         | ✓                     |
| B6      | LAX      | <b>Incomplete, No Schedule Provided</b> |               |                       |
| DL      | SLC      | 23:55                                   | 07:00         | ✓                     |

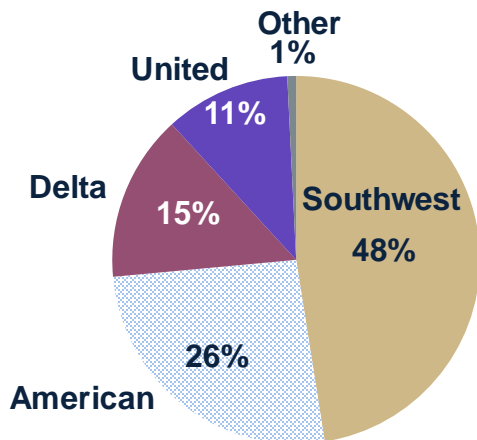
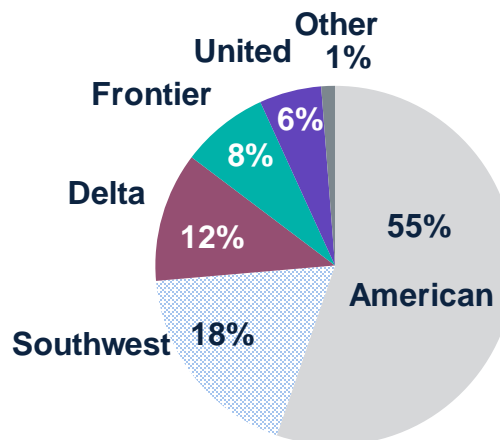
Note: Based on primary and back-up information provided in applications. American appears to not be interested in filing a back-up proposal  
 31 Source: Latest FAA guidance

# Of All Non-Limited Incumbent Carriers, JetBlue Has The Highest Share Of DCA Demand To/From Its Proposed Gateway - 81% - And Thus Limiting The Benefits Of More DCA - SJU Flying

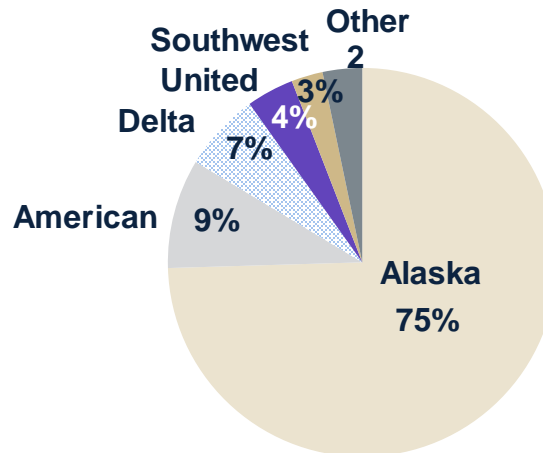
**DCA-SJU Demand Share  
JetBlue Proposal**



**DCA-LAS Demand Share  
Southwest Proposal**



**DCA-SAT Demand Share  
American Proposal**



**DCA-SEA Demand Share  
Delta Proposal**

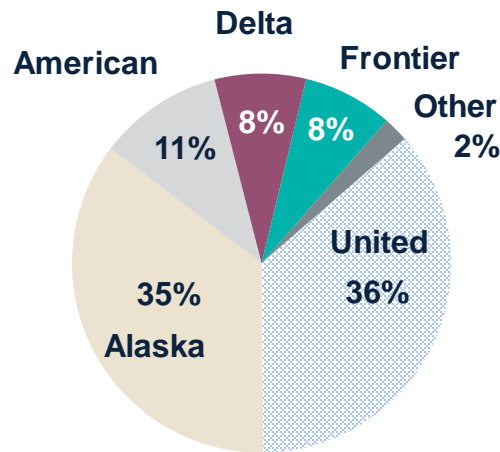
32 Note: Shares rounded to whole percent  
Source: DB1B O&D data, FY 2023



# Of All Non-Limited Incumbent Carriers, JetBlue Has The Highest Share Of DCA Demand To/From Its Proposed Gateway - 81% - And Thus Limiting The Benefits Of More DCA - SJU Flying

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**DCA-SFO Demand Share  
United Proposal**



33 Note: Shares rounded to whole percent  
Source: DB1B O&D data, FY 2023

## United Does Not Find Evidence To Support The JetBlue Claim That Its Proposed Second DCA - SJU Flight Will Lower Fares By 30%

### Fare Comparison For DCA Flights Before And After Additional JetBlue Capacity

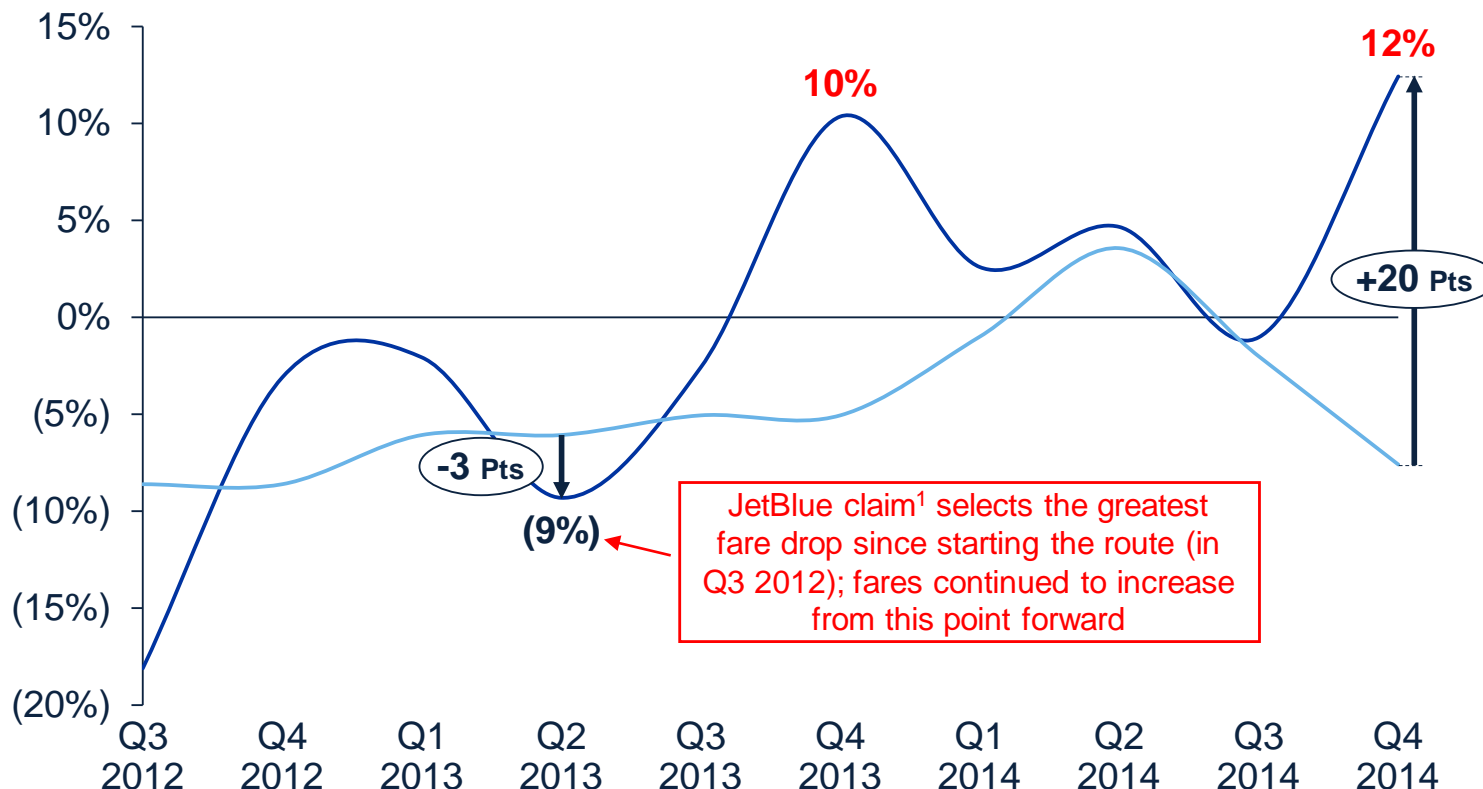
|       | Route   | Prior To JetBlue Flight Increase |            |        | Post JetBlue Flight Increase |          |            | Pax Change | Fare Change |        |             |
|-------|---------|----------------------------------|------------|--------|------------------------------|----------|------------|------------|-------------|--------|-------------|
|       |         | Period                           | B6 Flights | B6 Pax | B6 Avg Fare                  | Time     | B6 Flights |            |             | B6 Pax | B6 Avg Fare |
| 1     | DCA-FLL | TME 2Q12                         | 1 daily    | 206    | \$116                        | TME 2Q13 | 3 daily    | 634        | \$119       | 208%   | +3%         |
| 2     | DCA-MCO | TME 2Q12                         | 1 daily    | 219    | \$121                        | TME 2Q13 | 3 daily    | 630        | \$116       | 188%   | (4%)        |
| 3     | DCA-TPA | TME 2Q14                         | 1 daily    | 240    | \$113                        | TME 2Q15 | 2 daily    | 351        | \$106       | 46%    | (6%)        |
| 4     | DCA-FLL | TME 4Q14                         | 3 daily    | 656    | \$153                        | TME 4Q15 | 4 daily    | 763        | \$149       | 16%    | (3%)        |
| 5     | DCA-MCO | TME 4Q14                         | 3 daily    | 634    | \$139                        | TME 4Q15 | 4 daily    | 809        | \$127       | 28%    | (9%)        |
| Total |         |                                  |            | 1,954  | \$136                        | Total    |            | 3,186      | \$126       | 63%    | (7%)        |

Data shows JetBlue additional capacity leads to average 7% fare reduction across other DCA routes. No evidence of 30% fare reduction claimed by JetBlue

# Data Does Not Support JetBlue Claims About Lowered Average Fares On The DCA - San Juan Route Since JetBlue Entered

## The "JetBlue Effect": DCA-SJU Average Fares after JetBlue Entry

— DCA-SJU — DCA Domestic Average



JetBlue claim<sup>1</sup> selects the greatest fare drop since starting the route (in Q3 2012); fares continued to increase from this point forward

Note: Fares are % H/(L) of industry SJU-DCA fares vs Q2 2012, one quarter prior to JetBlue entry

Source: Diao O&D Report

35 <sup>1</sup>Application of JetBlue Airways Corporation at 12, footnote 27, where JetBlue reports Q3 2013 vs Q2 2012, but data shows JetBlue claim is for period Q2 2013 vs. Q2 2012



# JetBlue Boasts Connecting Opportunities To/From Seven Destinations Beyond SJU, Yet Only A Single One-Way, Same Day Connection Is Available With JetBlue's Proposed Schedule

| B6 Operated Flights: Caribbean, Latin America, and Proposed DCA #2 |        |        |      |          |          |          |      |        |        |         |  |
|--|--------|--------|------|----------|----------|----------|------|--------|--------|---------|--|
| Op Days  | Mkt AI | Flight | Orig | Dep Time | SJU Time | Arr Time | Dest | Mkt AI | Flight | Op Days |  |
|  |        |        |      |          | 9:45 AM  | 12:50 PM | DCA  | B6     | XXXX   | 1234567 |  |
|  |        |        |      |          | 10:20 AM | 11:19 AM | SDQ  | B6     | 1637   | 1234567 |  |
|  |        |        |      |          | 11:15 AM | 12:10 PM | PUJ  | B6     | 2631   | 1234567 |  |
|  |        |        |      |          | 11:25 AM | 12:25 PM | STI  | B6     | 1607   | 1234567 |  |
|  |        |        |      |          | 11:26 AM | 12:28 PM | SDQ  | B6     | 2537   | 1234567 |  |
|  |        |        |      |          | 12:10 PM | 2:30 PM  | CUN  | B6     | 2899   | 1.3..6. |  |
| 1234567  | B6     | 1638   | SDQ  | 12:19 PM | 1:19 PM  |          |      |        |        |         |  |
|  |        |        |      |          | 1:20 PM  | 3:05 PM  | MDE  | B6     | 2965   | .2.45.7 |  |
| .....6.  | B6     | 808    | STT  | 1:15 PM  | 1:57 PM  |          |      |        |        |         |  |
| 1234567  | B6     | 2632   | PUJ  | 1:10 PM  | 2:06 PM  |          |      |        |        |         |  |
| 1234567  | B6     | 1608   | STI  | 1:25 PM  | 2:25 PM  |          |      |        |        |         |  |
| 1234567  | B6     | 2538   | SDQ  | 1:28 PM  | 2:28 PM  |          |      |        |        |         |  |
|  |        |        |      |          | 2:29 PM  | 3:26 PM  | PUJ  | B6     | 2931   | 1234567 |  |
| .2.....  | B6     | 808    | STT  | 1:55 PM  | 2:37 PM  |          |      |        |        |         |  |
|  |        |        |      |          | 3:20 PM  | 4:00 PM  | STT  | B6     | 1036   | 1234567 |  |
|  |        |        |      |          | 3:35 PM  | 4:25 PM  | STX  | B6     | 2940   | ...4567 |  |
|  |        |        |      |          | 3:52 PM  | 4:46 PM  | PUJ  | B6     | 2831   | 1234567 |  |
| 1234567  | B6     | 2932   | PUJ  | 4:26 PM  | 5:24 PM  |          |      |        |        |         |  |
| 1234567  | B6     | 1135   | STT  | 4:47 PM  | 5:28 PM  |          |      |        |        |         |  |
| ...4567  | B6     | 2941   | STX  | 5:10 PM  | 6:00 PM  |          |      |        |        |         |  |
| 1234567  | B6     | XXXX   | DCA  | 2:00 PM  | 6:40 PM  |          |      |        |        |         |  |
| 1234567  | B6     | 2832   | PUJ  | 5:46 PM  | 6:41 PM  |          |      |        |        |         |  |
| 1.3..6.  | B6     | 2898   | CUN  | 3:30 PM  | 7:50 PM  |          |      |        |        |         |  |
| .2.45.7  | B6     | 2966   | MDE  | 4:05 PM  | 7:50 PM  |          |      |        |        |         |  |
|  |        |        |      |          | 7:52 PM  | 8:48 PM  | SDQ  | B6     | 1937   | 1234567 |  |
| 1234567  | B6     | 1938   | SDQ  | 9:48 PM  | 10:45 PM |          |      |        |        |         |  |

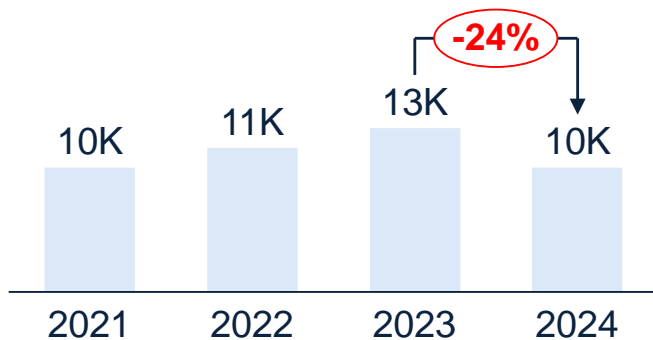
No same-day arrivals at SJU to connect to JetBlue proposed second departure from SJU

Only one same-day departure at SJU to connect to JetBlue proposed second arrival at SJU

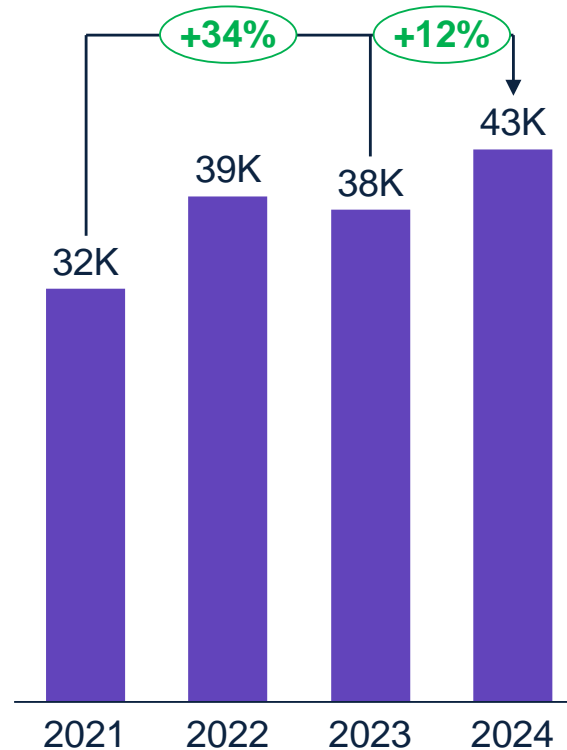


# In Considering Back-Up Proposals For DCA-LAX, United Is Investing In LAX Whereas JetBlue Is Retreating Significantly With A 24% Reduction In Departures 2024 Vs 2023

### JetBlue Annual Departures: LAX



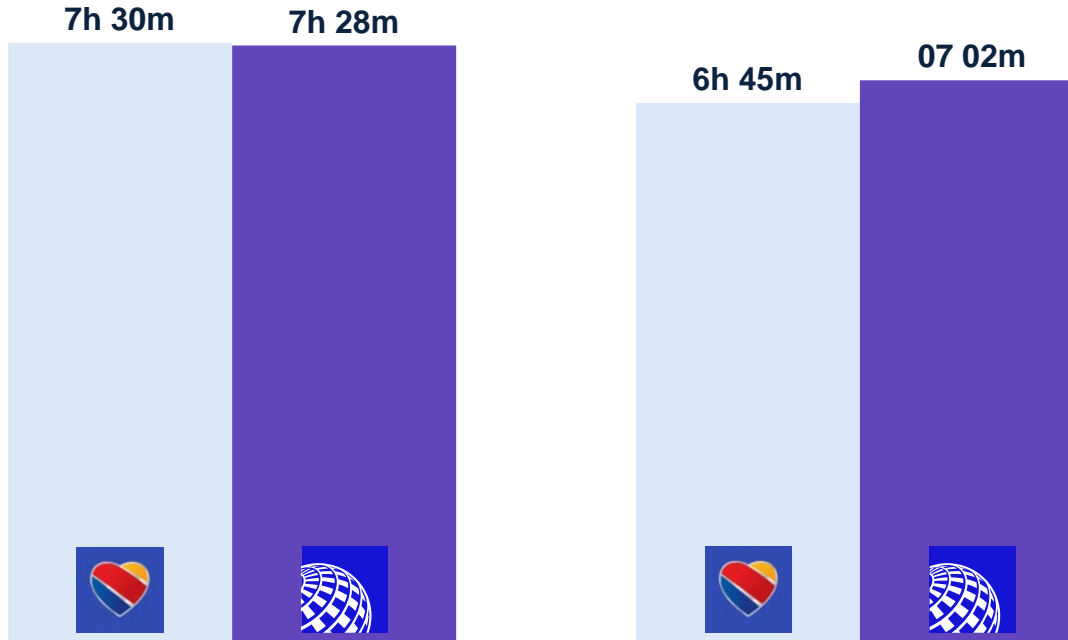
### United Annual Departures: LAX



Note: United maintains JetBlue has not complied with Department rules to provide schedule information for its  
37 back up proposal DCA-LAX-DCA  
Source: Diio Mi

# Southwest Alleged Travel Time Improvements From DCA To Sacramento Via LAS Are Hardly An Improvement From United Single Connect Options For Washington National - Sacramento Travelers

## Travel Time Comparisons DCA-SMF-DCA For Southwest And United



### DCA-SMF (West)

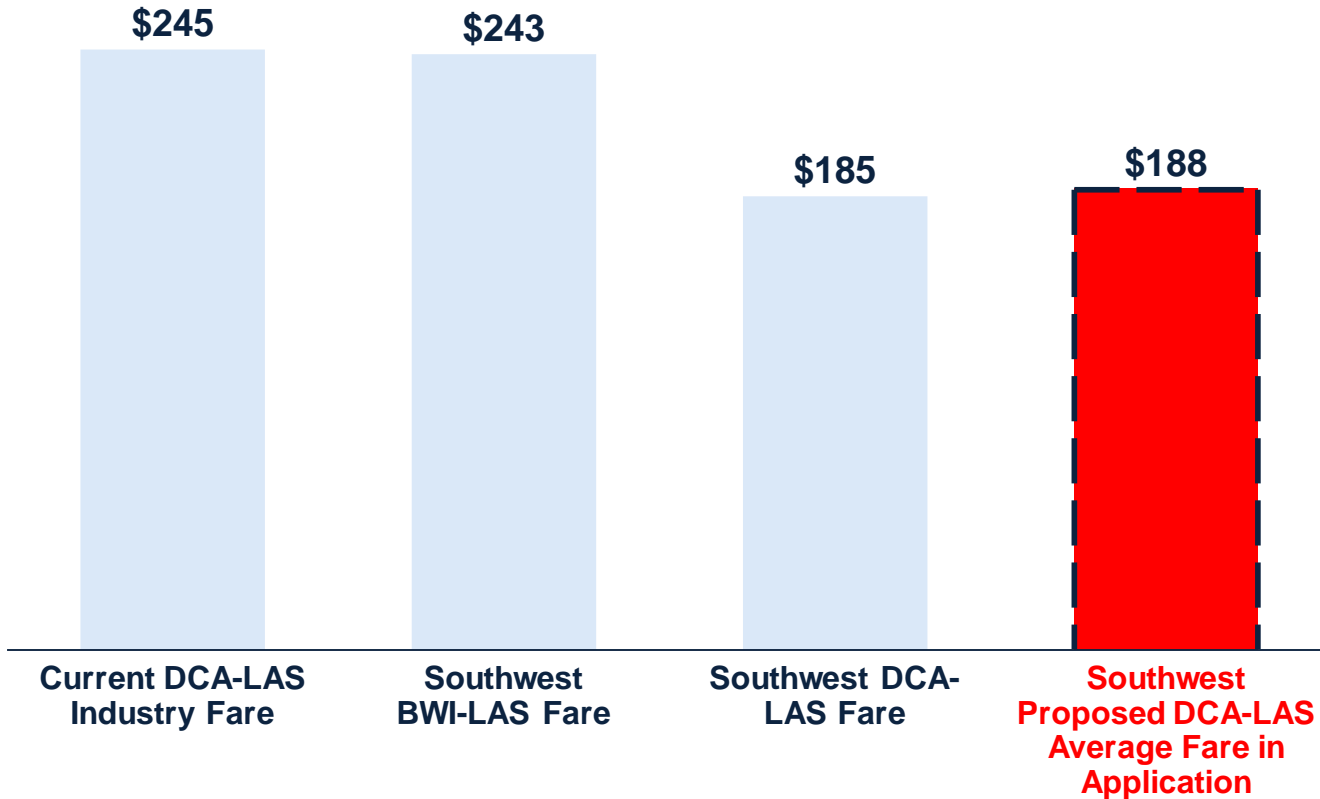
### SMF-DCA (East)

|               |          |         |          |         |
|---------------|----------|---------|----------|---------|
| Depart        | 4:25pm   | 6:02pm  | 7:00am   | 7:00am  |
| Connect Point | Thru LAS | Via SFO | Thru LAS | Via ORD |
| Arrive        | 8:55pm   | 10:30pm | 4:45pm   | 5:02pm  |



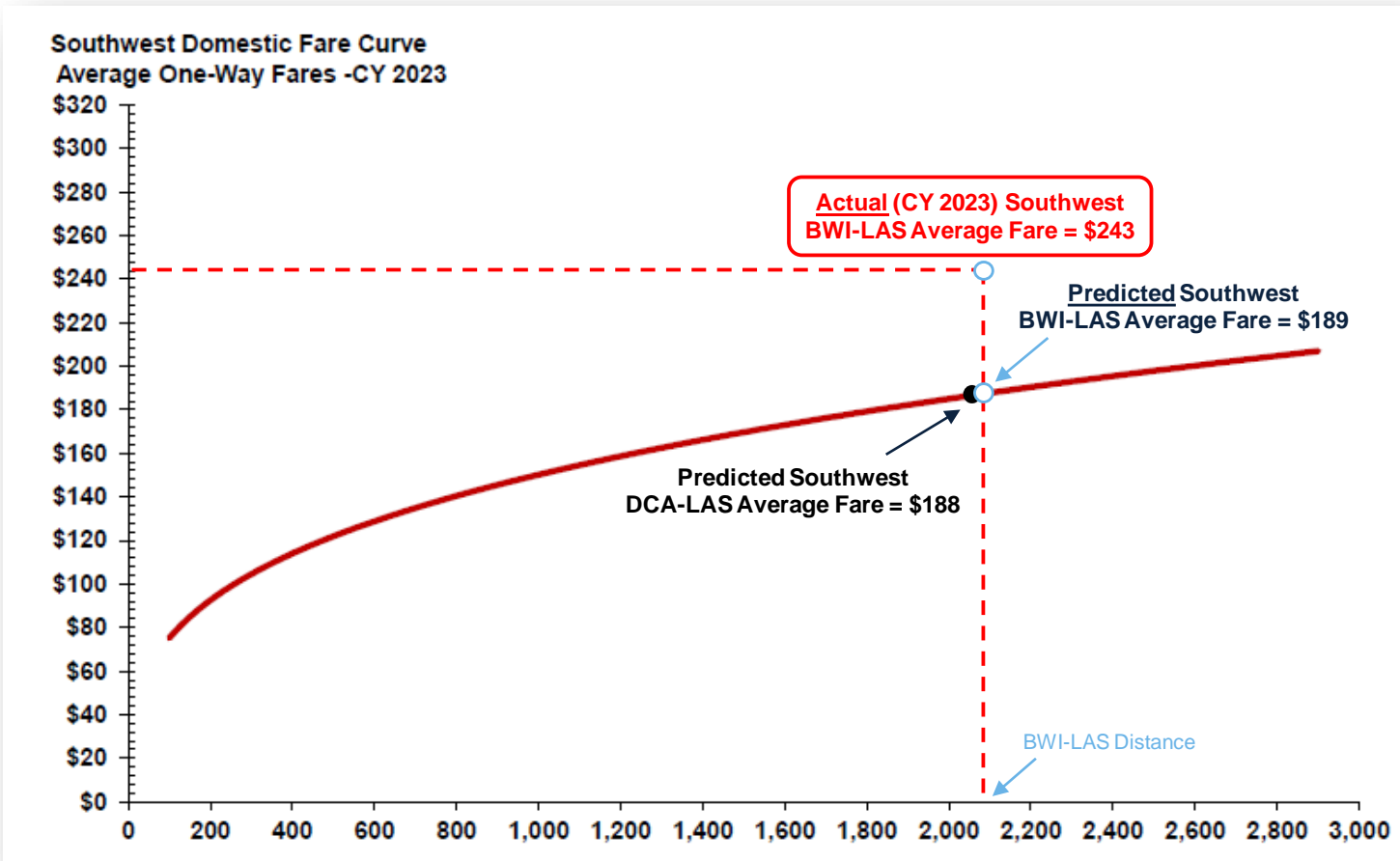
**Southwest Proposes A \$188 Average Fare For DCA - LAS Travelers, Which Is \$3 More Than The Current Fare Available By Southwest At \$185 And Substantially Less Than Southwest's BWI-LAX Fare At \$243**

**Washington D.C. - Las Vegas Fare Comparisons**



# Southwest's BWI-LAS Flight Is Priced \$54 Higher Than What Is Predicted By Southwest's "Domestic Fare Curve" Thus A DCA-LAS Fare Of \$188 Is Highly Doubtful

## Southwest Domestic Fare Curve





# Unlike United's Proposal, Delta's DCA-SEA-DCA Schedule Does Not Provide Any Time-Of-Day Enhancements For Consumers Compared To Flight Times Offered By Alaska

## DCA-SEA Westbound Departures

|      |      |      |      |       |       |       |      |      |      |      |      |      |      |      |      |
|------|------|------|------|-------|-------|-------|------|------|------|------|------|------|------|------|------|
| 6:00 | 7:00 | 8:00 | 9:00 | 10:00 | 11:00 | 12:00 | 1:00 | 2:00 | 3:00 | 4:00 | 5:00 | 6:00 | 7:00 | 8:00 | 9:00 |
|------|------|------|------|-------|-------|-------|------|------|------|------|------|------|------|------|------|



✈ 8:00am



✈ 5:00pm



✈ 5:40pm

Delta's proposed DCA-SEA-DCA flights are scheduled within 40 minutes of Alaska's flights

## SEA-DCA Eastbound Departures

|      |      |      |      |       |       |       |      |      |      |      |      |      |      |      |      |
|------|------|------|------|-------|-------|-------|------|------|------|------|------|------|------|------|------|
| 6:00 | 7:00 | 8:00 | 9:00 | 10:00 | 11:00 | 12:00 | 1:00 | 2:00 | 3:00 | 4:00 | 5:00 | 6:00 | 7:00 | 8:00 | 9:00 |
|------|------|------|------|-------|-------|-------|------|------|------|------|------|------|------|------|------|



✈ 8:00am



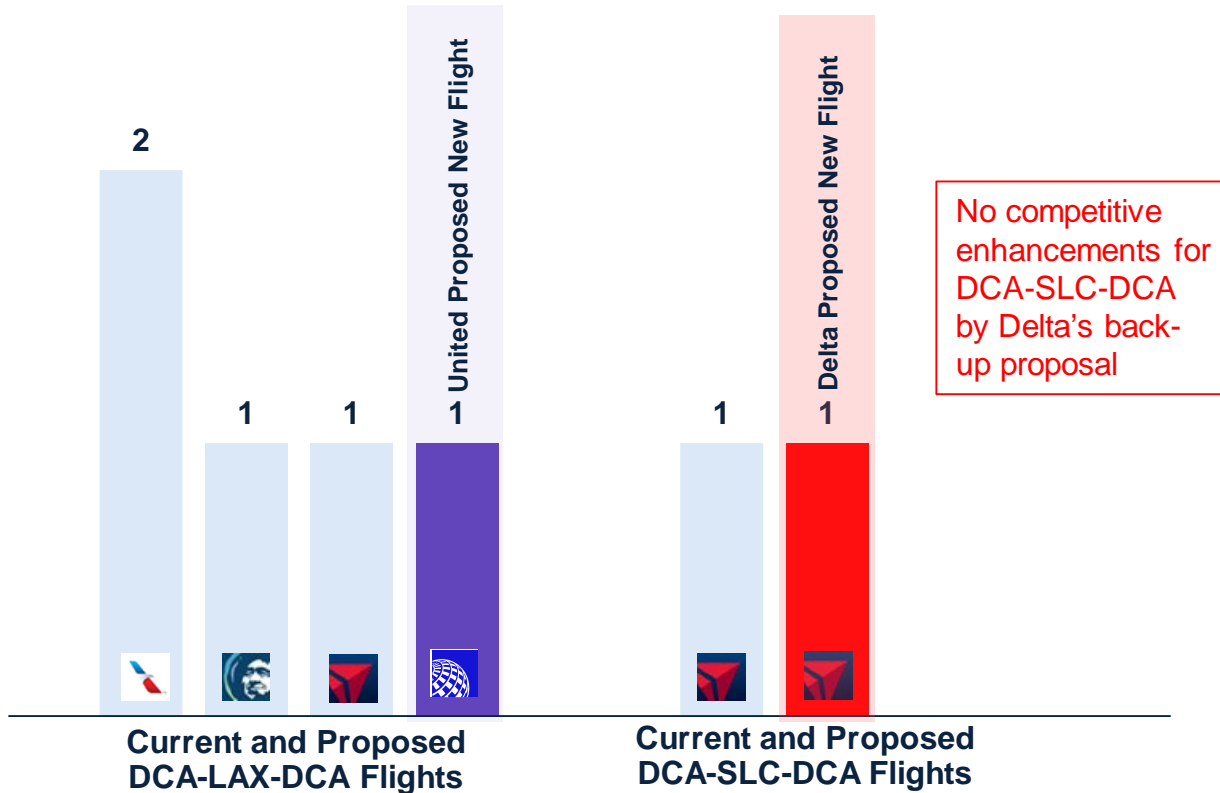
✈ 8:37am



✈ 1:57pm

# United's Backup Proposal Provides New Entrant Competition On The DCA-LAX-DCA Route Whereas Delta Proposes No Competitive Enhancements With Its Backup Proposal DCA-SLC-DCA

## Current And Proposed DCA Flights



# **EXHIBIT II**

# United States Senate

WASHINGTON, DC 20510

July 10, 2024

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

Dear Secretary Buttigieg:

As the U.S. Department of Transportation (DOT) implements Section 502 (“Additional Within and Beyond Perimeter Slot Exemptions at Ronald Reagan Washington National Airport”) of the FAA Reauthorization Act of 2024, I write to reiterate my concern with the imprudent decision to force the Federal Aviation Administration (FAA) and the Metropolitan Washington Airports Authority to implement new slot exemptions that will result in an additional 10 roundtrip long-haul flights arriving to, and departing from, Ronald Reagan National Airport (DCA)—one of our Nation’s most congested high density airports that requires Level 3 mandatory slot controls to prevent even worse delays due to DCA infrastructure that is inadequate to meet demand.

FAA must ensure implementation of additional slot exemptions is achieved in a careful manner that avoids compromising safety at DCA or the surrounding National Air Space (NAS). Our Nation has experienced a troubling aviation safety crisis, and the most responsible course of action would have been for Congress to allow FAA to fully implement the FAA Reauthorization Act’s urgently needed Air Traffic Organization safety reforms to enhance Air Traffic Controller hiring, training and deployment—*before* even considering mandating additional slot exemptions at DCA—which has experienced not one, but two alarming near-miss incidents since 2023.

In addition to safety concerns, FAA analysis indicates that Section 502 implementation carries a high risk of degrading DCA’s operational performance. As the FAA detailed in its May 25, 2023, memorandum summarizing its analysis of DCA performance since January 2022:

*“DCA has had the 5th largest number of Ground Delay Programs and Ground Stops (GDP and GS) in the NAS. The surrounding airspace, which includes DCA, Baltimore-Washington International Thurgood Marshall Airport (BWI), and Washington Dulles International Airport, is complicated, in part, due to a high volume of VIP and military operations. However, DCA has received 69% more GDPs and GSs than BWI and IAD combined. Additional flights at DCA would likely have a negative impact on operational performance and passenger experience.”*

FAA also provided evidence in its memorandum indicating that DCA’s limitations regarding operational capacity and gate availability likely drive DCA’s on-time flight performance challenges that harm passenger experience:

***“In terms of delay, DCA ranks 10th among the most delayed airports in the NAS, but only 19th in terms of operations, indicating that DCA is more delay prone than most other airports. About 20% of departures and 22% of arrivals experience average delays of 67 minutes coming in and out of DCA.***

***DCA is already in the Top 5 for ground delay program and ground stop counts among the Core 30, or the nation’s 30 busiest, airports for January 2022 through April 2023. Most delays at DCA are not attributable to the national airspace and may indicate other challenges at DCA such as gate availability***

***DCA also has more one loop airborne holds (less than 15 minutes) than all other airports and ranks 3rd in reportable airborne holding events per arrival (greater than 15 minutes) [emphasis added].”***

Since the FAA Reauthorization Act of 2024 did nothing to increase the size of DCA runways or expand DCA gate capacity, in implementing Section 502, I strongly urge DOT prioritize granting within or beyond perimeter slot exemptions to eligible air carriers that submit applications containing proposed additional flights with arrival and departure times that strategically **avoid** DCA’s most congested travel times.

Awarding beyond perimeter slot exemptions to air carriers seeking to add additional flights with arrival and departure times coinciding with DCA’s busiest hours would unacceptably degrade passenger experience and disrupt operations at DCA—an airport that is already experiencing operational performance challenges that according to FAA, are likely driven by DCA-specific factors, such as limited gate availability and inadequate infrastructure vis-à-vis demand.

Taking these facts into account, United Airlines, Inc. (United), is acting in a responsible manner with its DCA slot waiver application designed to mitigate harm to passenger experience and operational performance at DCA. Specifically, United applied for a slot exemption to operate a long-haul flight between DCA and San Francisco International Airport (SFO) that would feature a morning departure from DCA to SFO and an afternoon departure from SFO to DCA that strategically **avoid** DCA’s most congested hours.

Awarding United an exemption would incentivize competing air carriers to prioritize requesting additional long-haul flights that arrive and depart during less congested hours—along with enhancing market competition for travel between the greater Washington, D.C., metro region and San Francisco, a key priority for consumers in both regions. Demand for air travel is high across all travel categories and an additional flight for United between DCA and SFO would provide new scheduling options and help meet the broad range of consumers’ needs in communities on both coasts of the United States, without adding additional flights during DCA’s most overburdened operating hours.


Finally, awarding United with a slot exemption would support the Sustainable Aviation Fuel (SAF) Grand Challenge, the governmentwide initiative led by DOT and the U.S. Departments of Agriculture and Energy that seeks “...to accelerate the research, development, demonstration

and deployment needed for an ambitious government-wide commitment to scale up the production of SAF to 35 billion gallons per year by 2050.”

To achieve this admirable and ambitious goal, DOT should use every opportunity to support air carriers that prioritize SAF. This includes United, which in 2016 became the first air carrier globally to use SAF in regular operations on a continuous basis in California, and last year, used twice as much SAF in operations compared to competing U.S. air carriers. With respect to United’s slot exemption application, it should be noted that since 2023, United has used SAF in its regular operations from SFO—and awarding an exemption for flight connecting SFO with DCA would demonstrate DOT’s commitment to promoting air carrier best practices that will be necessary to meet the SAF Grand Challenge’s commendable goal of spurring the production of 3 billion gallons of SAF annually by 2030 and 35 billion gallons of SAF annually by 2050.

In closing, in evaluating slot exemption applications, I urge DOT to safeguard DCA passenger experience, safety and operational performance by prioritizing air carrier applications that enhance connectivity and service; strengthen competition; and propose strategically timed flights that proactively seek to mitigate against the threat of worsening DCA’s already troubling performance regarding ground delay programs and ground stops; and one loop airborne holds and reportable airborne holding events per arrival.

Sincerely,



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Tammy Duckworth  
Chair  
Subcommittee on Aviation  
Safety, Operations and  
Innovation  
Senate Committee on  
Commerce, Science and  
Transportation

# Congress of the United States

Washington, DC 20515

July 8, 2024

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

**Reference: Docket DOT-OST-2024-0065**

Dear Secretary Buttigieg,

We write today in strong support of the application by United Airlines, Inc. (United) to the U.S. Department of Transportation for an additional flight between Ronald Reagan Washington National Airport (DCA) and San Francisco International Airport (SFO).

An additional flight between DCA and SFO will enhance market competition for travel between the greater Washington, D.C., metro region and San Francisco, a key priority for consumers in both regions. Demand for air travel is high across all travel categories and an additional flight for United between DCA and SFO will provide new scheduling options and help meet the broad range of consumers' needs in communities on both coasts of the United States. Importantly, United's proposed flight would avoid the most congested travel times at DCA and provide additional scheduling options to customers by offering for the first time a morning departure from DCA to SFO and an afternoon departure from SFO to DCA.

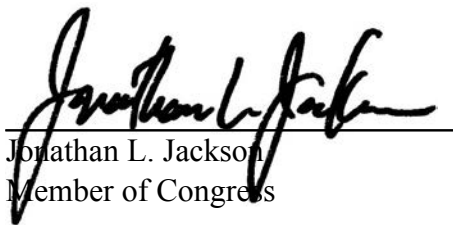
United Airlines is headquartered in our home state of Illinois, where it is among the largest private sector employers in Chicago. More than 80 percent of United's employees are represented by labor unions. Chicago's O'Hare International Airport is United's largest hub, and increasing connectivity between DCA and SFO will help enhance United's overall network.

Further, United is an industry leader in sustainability. In 2016, United became the first airline globally to use Sustainable Aviation Fuel (SAF) in regular operations on a continuous basis in California. Since 2023, United has used SAF in its regular operations from both SFO and Los

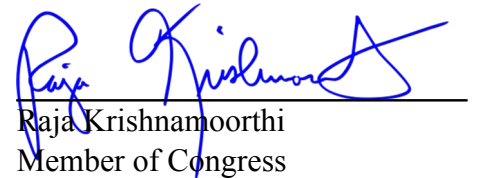
Angeles International Airport (LAX). Last year, United used twice as much SAF in its operations as any other U.S. carrier.

We strongly urge the Department of Transportation to approve United's request for new service between DCA and SFO, as it will improve connectivity, increase competition, and provide enhanced service.

Sincerely,




Jonathan L. Jackson  
Member of Congress



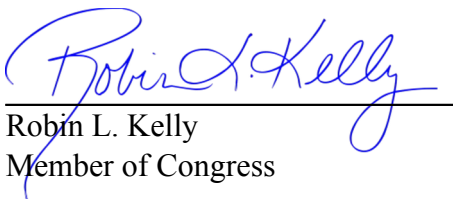
Raja Krishnamoorthi  
Member of Congress



Bradley Scott Schneider  
Member of Congress



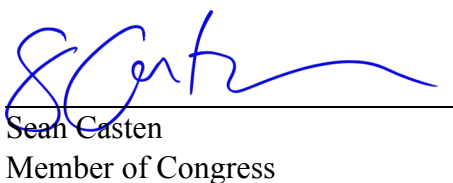
Mike Quigley  
Member of Congress



Robin L. Kelly  
Member of Congress



Danny K. Davis  
Member of Congress



Sean Casten  
Member of Congress



# Congress of the United States

Washington, DC 20515

July 10, 2024

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

Reference: Docket DOT-OST-2024-0065

Dear Secretary Buttigieg,

We are writing today regarding United Airlines, Inc. (United)'s application to the Department of Transportation (DOT) for nonstop air service between Ronald Reagan Washington National Airport (DCA) and San Francisco International Airport (SFO).

Demand for travel between the Washington, D.C. metro region and San Francisco remains high for business travelers, leisure and low-fare travelers, and families. According to United, an additional flight between DCA and SFO would enhance competition and help meet the broad range of consumers' needs in communities on both coasts of the United States. Importantly, United's proposed flight would avoid the most congested travel times at DCA and provide additional scheduling options to customers by offering for the first time a morning departure from DCA to SFO and an afternoon departure from SFO to DCA. This would improve options for our constituents who travel between both coasts for business and leisure.

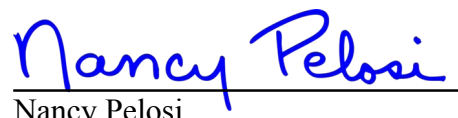
The San Francisco metropolitan statistical area is the largest in this proceeding (4.6 million people) based upon other airlines' announced plans for DCA slot applications – and San Francisco leads the next-largest likely candidate city (Seattle) by half a million people. Furthermore, San Francisco is the third largest beyond-perimeter destination from the Washington, D.C. metro region, at nearly 600,000 annual bookings, yet with only two daily flights it has half as much service as the top two routes (Los Angeles and Denver). According to United, an additional flight would help correct this imbalance and add additional connectivity to western U.S. cities, as well as Asia-Pacific points that United serves via its San Francisco hub.

We respectfully request you give United's request for new service between DCA and SFO full and fair consideration in accordance with all applicable laws, rules, and regulations.

Sincerely,



Eric Swalwell  
Member of Congress



Nancy Pelosi  
Member of Congress



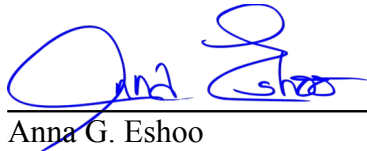
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Mike Thompson  
Member of Congress



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Barbara Lee  
Member of Congress



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Anna G. Eshoo  
Member of Congress



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Kevin Mullin  
Member of Congress



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Zoe Lofgren  
Member of Congress



---

Jimmy Panetta  
Member of Congress



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Josh Harder  
Member of Congress

**HOUSE OF DELEGATES**  
RICHMOND

**DON SCOTT**  
**SPEAKER**

Speaker's Room  
State Capitol  
Post Office Box 406  
Richmond, Virginia 23218

COMMITTEE ASSIGNMENTS:  
RULES (CHAIR)

July 12, 2024

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

Reference: Docket DOT-OST-2024-0065

Dear Secretary Buttigieg,

I write today in strong support of United Airlines' application to the U.S. Department of Transportation for an additional flight between Ronald Reagan Washington National Airport (DCA) and San Francisco International Airport (SFO). United is the only air carrier that operates a hub in Virginia and United employs roughly 8,000 people in Virginia.

Demand for travel between the Northern Virginia/Washington, D.C. metro region and San Francisco remains very high for business travelers, leisure and low-fare travelers, and families. An additional flight for United between DCA and SFO would enhance competition and provide new scheduling options and help meet the broad range of consumers' needs in communities on both coasts of the United States.

- The San Francisco metropolitan region is the largest in this proceeding (4.6 million people) based upon other airlines' announced plans for a DCA flight – and San Francisco leads the next largest likely candidate city (Seattle) by half a million people. San Francisco is the third largest beyond-perimeter destination from Washington, D.C. at 584,000 annual bookings, yet it has half as much service as the top two destinations from DCA with two daily flights, one of which is operated by Alaska Airlines and the other by United. An additional United flight would help correct this imbalance and add additional connectivity to western U.S. cities.
- Northern Virginia is home to ten Fortune 500 companies, and the Greater Washington region is home to an additional five Fortune 500 companies. Providing additional connectivity and competition between these two critical business hubs will strengthen economic growth in both regions.
- Additionally, awarding United with a slot exemption would support additional development and deployment of Sustainable Aviation Fuel (SAF), which is critical to reducing aviation emissions. United has been a leader in SAF development since 2016, when it became the

**HOUSE OF DELEGATES**  
RICHMOND

**DON SCOTT**  
**SPEAKER**

Speaker's Room  
State Capitol  
Post Office Box 406  
Richmond, Virginia 23218

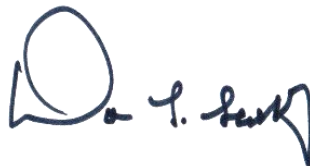
COMMITTEE ASSIGNMENTS:  
RULES (CHAIR)

first air carrier globally to use SAF in regular operations on a continuous basis in California. Last year, United used twice as much SAF in operations compared to competing U.S. air carriers. With respect to United's slot exemption application, it should be noted that since 2023, United has used SAF in its regular operations from SFO—and awarding an exemption for flight connecting SFO with DCA would demonstrate DOT's commitment to promoting air carrier best practices that will be necessary to meet the SAF Grand Challenge's commendable goal of spurring the production of 3 billion gallons of SAF annually by 2030 and 35 billion gallons of SAF annually by 2050. DOT should use every opportunity to support air carriers that prioritize SAF.

- Finally, and perhaps most importantly, United's proposed flight would avoid the most congested travel times at DCA and provide additional scheduling options to customers by offering for the first time a morning departure from DCA to SFO and an afternoon departure from SFO to DCA. United's proposed flight between DCA and SFO would help meet consumers' needs in communities on both coasts of the United States, without adding additional flights during DCA's most overburdened operating hours.

I strongly urge the Department of Transportation to approve United Airlines' request for new service between DCA and SFO, as it will improve connectivity, increase competition, and safely provide enhanced service for my constituents.

Sincerely,

A handwritten signature in black ink, appearing to read "Don Scott". The signature is stylized with a large, looped initial "D" and a cursive "S".

Speaker Don Scott  
Virginia House of Delegates



UAL MEC  
AIR LINE PILOTS ASSOCIATION, INTERNATIONAL

9550 W. Higgins Road • Suite 1000 • Rosemont, IL 60018 • 847-292-1700

July 10, 2024

The Honorable Pete Buttigieg  
Secretary  
U.S. Department of Transportation  
1200 New Jersey Avenue, SE  
Washington, DC 20590  
[DOTExecSec@dot.gov](mailto:DOTExecSec@dot.gov)

Reference: Docket DOT-OST-2024-0065

Dear Secretary Buttigieg,

We write today in strong support of the application by United Airlines to the Department of Transportation (DOT) for nonstop air service between Ronald Reagan Washington National Airport (DCA) and San Francisco International Airport (SFO).

Demand for travel between the Washington, D.C. metro region and San Francisco remains high for business travelers, leisure and low-fare travelers, and families. An additional United flight between DCA and SFO would enhance competition and help meet the broad range of customers' needs in communities on both coasts of the United States. A key feature of United's proposal is that it will not add to peak hour congestion at DCA, whose workers and air traffic controllers and infrastructure are operating beyond their intended capacity at peak times.

Additionally, United employs one of the largest number of unionized workers, with more than 80 percent employees represented by labor unions. That is a notable distinction in this proceeding, because one of the competing proposals is being advanced by an airline that has consistently opposed collective bargaining, and consequently only 20 percent of its employees are unionized.

We strongly urge the Department of Transportation to approve United's request for new service between DCA and SFO, as it will improve connectivity, increase competition, and provide enhanced service for our customers.

Sincerely,

Captain Anne Worster  
Chair - United Airlines Master Executive Council  
Air Line Pilots Association, International  
[Anne.Worster@alpa.org](mailto:Anne.Worster@alpa.org)



San Francisco International Airport

July 11, 2024

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

**Reference: Docket DOT-OST-2024-0065**

Dear Secretary Buttigieg:

I write today in strong support of the application by United Airlines, Inc. (United) to the Department of Transportation (DOT) for nonstop air service between Ronald Reagan Washington National Airport (DCA) and San Francisco International Airport (SFO).

SFO has seen great success with its current United flight to DCA for business travelers, leisure and low-fare travelers, and families. An additional United flight would improve connectivity, increase competition, and provide additional scheduling options to customers by offering, for the first time, a morning departure from DCA to SFO and an afternoon departure from SFO to DCA.

The San Francisco metropolitan statistical area is the largest in this proceeding (4.6 million people) based upon other airlines' announced plans for DCA slot applications, and San Francisco leads the next largest likely candidate city (Seattle) by half a million people. Furthermore, San Francisco is the third largest beyond-perimeter destination from the Washington, D.C. metro region, at nearly 600,000 annual bookings. Yet, it has half as much service as the top two routes (Los Angeles and Denver). An additional United flight would help correct this imbalance and increase connectivity to western U.S. cities, as well as Asia-Pacific points that United serves via its San Francisco hub.

I strongly urge the DOT to approve United's request for new service between DCA and SFO, as it will improve connectivity, increase competition, and provide enhanced service for SFO travelers.

Very truly yours,



Ivar C. Satero  
Airport Director

AIRPORT COMMISSION CITY AND COUNTY OF SAN FRANCISCO

LONDON N. BREED  
MAYOR

MALCOLM YEUNG  
PRESIDENT

EVERETT A. HEWLETT, JR.  
VICE PRESIDENT

JANE NATOLI

JOSE F. ALMANZA

MARK BUELL

IVAR C. SATERO  
AIRPORT DIRECTOR

July 15, 2024

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

Reference: Docket DOT-OST-2024-0065

Dear Secretary Buttigieg,

I write today in strong support of the application by United Airlines, Inc. (United) to the Department of Transportation (DOT) for nonstop air service between Ronald Reagan Washington National Airport (DCA) and San Francisco International Airport (SFO). An additional United flight between DCA and SFO would enhance competition and help meet the broad range of consumers' needs in communities on both coasts of the United States, including connectivity to Bakersfield, California through the Meadows Field Airport (BFL).

San Francisco is the third largest beyond-perimeter destination from the Washington, D.C. metro region, at nearly 600,000 annual bookings, yet with only two daily flights it has half as much service as the top two routes (Los Angeles and Denver). United's proposed flight would provide additional scheduling options to customers by offering for the first time a morning departure from DCA to SFO and an afternoon departure from SFO to DCA. This additional United flight would help correct this imbalance and increase connectivity. I believe that the community around Bakersfield, California through the Meadows Field Airport (BFL) stands to benefit from the enhanced choice and convenience that United's proposal will generate.

I strongly urge the Department of Transportation to approve United's request for new service between DCA and SFO, as it will improve connectivity, increase competition, and provide enhanced service for our customers.

Sincerely,



Ron Brewster

**YOUR GATEWAY TO BOUNDLESS TRAVEL**

3701 Wings Way, Suite 300, Bakersfield, CA. 93308 | 661.391.1800 | meadowsfield.com



## FRESNO YOSEMITE International Airport

### City of Fresno Airports Department

4995 E Clinton Way, Fresno, California 93727-1525  
(559) 621-4500 • [flyfresno.com](http://flyfresno.com)

July 8, 2024

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

Reference: Docket DOT-OST-2024-0065

Dear Secretary Buttigieg,

I write today in strong support of the application by United Airlines, Inc. (United) to the Department of Transportation (DOT) for nonstop air service between Ronald Reagan Washington National Airport (DCA) and San Francisco International Airport (SFO). An additional United flight between DCA and SFO would enhance competition and help meet the broad range of consumers' needs in communities on both coasts of the United States, including connectivity to Fresno Yosemite International Airport.

San Francisco is the third largest beyond-perimeter destination from the Washington, D.C. metro region, at nearly 600,000 annual bookings, yet with only two daily flights it has half as much service as the top two routes (Los Angeles and Denver). United's proposed flight would provide additional scheduling options to customers by offering for the first time a morning departure from DCA to SFO and an afternoon departure from SFO to DCA. This additional United flight would help correct this imbalance and increase connectivity. I believe that Fresno stands to benefit from the enhanced choice and convenience that United's proposal will generate.

I strongly urge the Department of Transportation to approve United's request for new service between DCA and SFO, as it will improve connectivity, increase competition, and provide enhanced service for our customers.

Sincerely,

Henry Thompson, A.A.E., IAP  
Director of Aviation  
City of Fresno, Airports Department  
Fresno Yosemite International Airport  
Fresno Chandler Executive Airport





**COUNTY OF HUMBOLDT**  
DEPARTMENT OF AVIATION  
3561 Boeing Ave., McKinleyville, CA 95519  
Phone: (707) 839-5401



July 8, 2024

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

Reference: Docket DOT-OST-2024-0065

Dear Secretary Buttigieg,

I write today in strong support of the application by United Airlines, Inc. (United) to the Department of Transportation (DOT) for nonstop air service between Ronald Reagan Washington National Airport (DCA) and San Francisco International Airport (SFO). An additional United flight between DCA and SFO would enhance competition and help meet the broad range of consumers' needs in communities on both coasts of the United States, including connectivity to the California Redwood Coast-Humboldt County Airport (ACV).

San Francisco is the third largest beyond-perimeter destination from the Washington, D.C. metro region, at nearly 600,000 annual bookings, yet with only two daily flights it has half as much service as the top two routes (Los Angeles and Denver). United's proposed flight would provide additional scheduling options to customers by offering for the first time a morning departure from DCA to SFO and an afternoon departure from SFO to DCA. This additional United flight would help correct this imbalance and increase connectivity. I believe that our rural and isolated Northern California Coastal Region stands to benefit from the enhanced choice and convenience that United's proposal will generate.

I strongly urge the Department of Transportation to approve United's request for new service between DCA and SFO, as it will improve connectivity, increase competition, and provide enhanced service for our customers.

Sincerely,

Cody Roggatz, C.M.  
Director of Aviation  
County of Humboldt



July 8, 2024

BOARD OF DIRECTORS

Mary Ann Leffel, Chair  
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Danial Pick  
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Executive Director  
Scott Huber  
District Counsel

The Honorable Pete Buttigieg  
Secretary  
**U.S. DEPARTMENT OF TRANSPORTATION**  
1200 New Jersey Avenue, SE  
Washington, DC 20590

Via Email

Reference: Docket DOT-OST-2024-0065

Dear Secretary Buttigieg,

I write today in strong support of the application by United Airlines, Inc. (United) to the Department of Transportation (DOT) for nonstop air service between Ronald Reagan Washington National Airport (DCA) and San Francisco International Airport (SFO). An additional United flight between DCA and SFO would enhance competition and help meet the broad range of consumers' needs in communities on both coasts of the United States, including connectivity to Monterey, CA (MRY).

San Francisco is the third largest beyond-perimeter destination from the Washington, D.C. metro region, at nearly 600,000 annual bookings, yet with only two daily flights it has half as much service as the top two routes (Los Angeles and Denver). United's proposed flight would provide additional scheduling options to customers by offering for the first time a morning departure from DCA to SFO and an afternoon departure from SFO to DCA. This additional United flight would help correct this imbalance and increase connectivity. I believe that Monterey, CA stands to benefit from the enhanced choice and convenience that United's proposal will generate.

I strongly urge the Department of Transportation to approve United's request for new service between DCA and SFO, as it will improve connectivity, increase competition, and provide enhanced service for our customers.

Best Regards,  
**MONTEREY REGIONAL AIRPORT**

Michael La Pier, A.A.E  
Executive Director



July 8, 2024

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

Reference: Docket DOT-OST-2024-0065

Dear Secretary Buttigieg,

I write today in strong support of the application by United Airlines, Inc. (United) to the Department of Transportation (DOT) for nonstop air service between Ronald Reagan Washington National Airport (DCA) and San Francisco International Airport (SFO). An additional United flight between DCA and SFO would enhance competition and help meet the broad range of consumers' needs in communities on both coasts of the United States, including connectivity to San Luis Obispo County Airport (SLO County Airport).

San Francisco is the third largest beyond-perimeter destination from the Washington, D.C. metro region, at nearly 600,000 annual bookings, yet with only two daily flights it has half as much service as the top two routes (Los Angeles and Denver). United's proposed flight would provide additional scheduling options to customers by offering for the first time a morning departure from DCA to SFO and an afternoon departure from SFO to DCA. This additional United flight would help correct this imbalance and increase connectivity. I believe that SLO County Airport stands to benefit from the enhanced choice and convenience that United's proposal will generate.

I strongly urge the Department of Transportation to approve United's request for new service between DCA and SFO, as it will improve connectivity, increase competition, and provide enhanced service for our customers.

Sincerely,

Courtney M. Johnson, C.M., C.A.E.  
Director of Airports



# City of Santa Barbara

Santa Barbara Airport



Airport Administration

July 8, 2024

601 Firestone Rd.

Santa Barbara, CA 93117

(805) 967-7111

(805) 964-1380 FAX

The Honorable Pete Buttigieg

Secretary

U.S. Department of Transportation

1200 New Jersey Avenue, SE

Washington, DC 20590

Airport Operations

Airport Patrol

(805) 681-4803

Reference: Docket DOT-OST-2024-0065

Badge Office

(805) 681-6385

Dear Secretary Buttigieg,

Engineering

(805) 692-6018

I write today in strong support of the application by United Airlines, Inc. (United) to the Department of Transportation (DOT) for nonstop air service between Ronald Reagan Washington National Airport (DCA) and San Francisco International Airport (SFO). An additional United flight between DCA and SFO would enhance competition and help meet the broad range of consumers' needs in communities on both coasts of the United States, including connectivity to SBA.

Maintenance

(805) 692-6060

San Francisco is the third largest beyond-perimeter destination from the Washington, D.C. metro region, at nearly 600,000 annual bookings, yet with only two daily flights it has half as much service as the top two routes (Los Angeles and Denver). United's proposed flight would provide additional scheduling options to customers by offering for the first time a morning departure from DCA to SFO and an afternoon departure from SFO to DCA. This additional United flight would help correct this imbalance and increase connectivity. I believe that Santa Barbara, Ca stands to benefit from the enhanced choice and convenience that United's proposal will generate.

Marketing

(805) 692-6024

Noise Abatement

(805) 967-1900

I strongly urge the Department of Transportation to approve United's request for new service between DCA and SFO, as it will improve connectivity, increase competition, and provide enhanced service for our customers.

Planning

(805) 692-6032

Property Management

(805) 692-6022

Sincerely,

Visitors Center

(805) 964-7622

Jonathan Abad

City of Santa Barbara – Airport Department Business Manager

601 Firestone Road


Santa Barbara, CA 93117

FlySBA.com

CERTIFICATE OF SERVICE

I certify that I have on 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:

|               |                   |                                |
|---------------|-------------------|--------------------------------|
| Air Canada    | Anita Mosner      | anita.mosner@hklaw.com         |
| Alaska        | David Heffernan   | dheffernan@cozen.com           |
| American      | Molly Wilkinson   | molly.wilkinson@aa.com         |
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| Delta         | Chris Walker      | chris.walker@delta.com         |
|               | Steve Seiden      | steven.seiden@delta.com        |
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Amna Arshad

July 17, 2024