

BEFORE THE
DEPARTMENT OF TRANSPORTATION
WASHINGTON, D.C.

Motion of

DELTA AIR LINES, INC.

in the matter of 2019 U.S. Haneda Combination
Services Allocation Proceeding

Docket DOT-OST-2019-0014

OBJECTION OF
UNITED AIRLINES, INC.

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May 8, 2023

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United¹ hereby submits the following objection to Delta’s motion for U.S.-Tokyo Haneda (Haneda) gateway flexibility. United strongly disagrees with Delta² and American³ that the current demand environment warrants a sudden departure from the Department’s long-standing procedure and precedent. The Department should reject Delta’s latest self-serving scheme for an unprecedented, and untested “pilot program” for “limited” gateway flexibility at Tokyo Haneda just as the Department has rejected Delta’s⁴ and others’⁵ prior requests for gateway flexibility, and should continue to use its own unbiased judgment in allocating rights based upon a full and complete assessment of public benefits. Despite the challenges of the COVID pandemic, the U.S.-

¹ Common names are used for airlines.

² See Motion of Delta Air Lines, Inc. for Limited U.S.-Haneda Gateway Flexibility, Docket DOT-OST-2019-0014 (May 1, 2023).

³ See Answer of American Airlines, Inc., Docket DOT-OST-2019-0014 (May 2, 2023).

⁴ See DOT Order 2019-2-5 (Feb. 7, 2019) (denying Delta’s request for gateway flexibility for U.S.-Haneda slots).

⁵ See also DOT Order 2018-11-5 (November 9, 2018) (denying American’s motion for U.S.- Cuba gateway flexibility).

Japan market is rebounding, and access to limited entry route rights should continue to be about consumers, communities, and shippers as it always has been, not about carriers' financial performance. It is the Department that should be the ultimate arbiter of the best U.S. gateways to ensure maximum benefits of the Haneda slots – not Delta or American, who are appearing to prioritize their own profits over benefitting consumers.

As the Department knows, the Tokyo Haneda slots were the product of long and difficult negotiations between the U.S. and Japanese delegations over the course of several years. Once secured, the Department undertook a series of proceedings to implement the bilateral agreements and to ensure the valuable rights were allocated in a manner that would maximize benefits to consumers. The Department's primary concern in route allocation proceedings has always been to find a carrier that is best positioned to "offer and maintain the best service for the traveling and shipping public."⁶ Carriers and gateway communities partnered together in these proceedings and invested significant time, money, and resources to secure and operationalize the slot pairs to the benefit of their consumers. Delta and American now ask the Department to simply disregard all of the prior efforts and investments by the government regulators, carriers, and cities alike, instead suggesting that their own judgments are an appropriate substitute for the Department's. This is not in the public interest.

For the reasons above and as set forth below, United urges the Department to deny Delta's motion and continue to ensure that the Department's hard-fought efforts in obtaining Haneda slots and maximizing their use are not squandered. United also moves the Department to reject the "me-too" answer of American, whose half-page text clearly shows American gave the issue no serious

⁶ See DOT Order 2019-2-5 at 2 (Feb. 7, 2019), Docket DOT-OST-2016-0048.

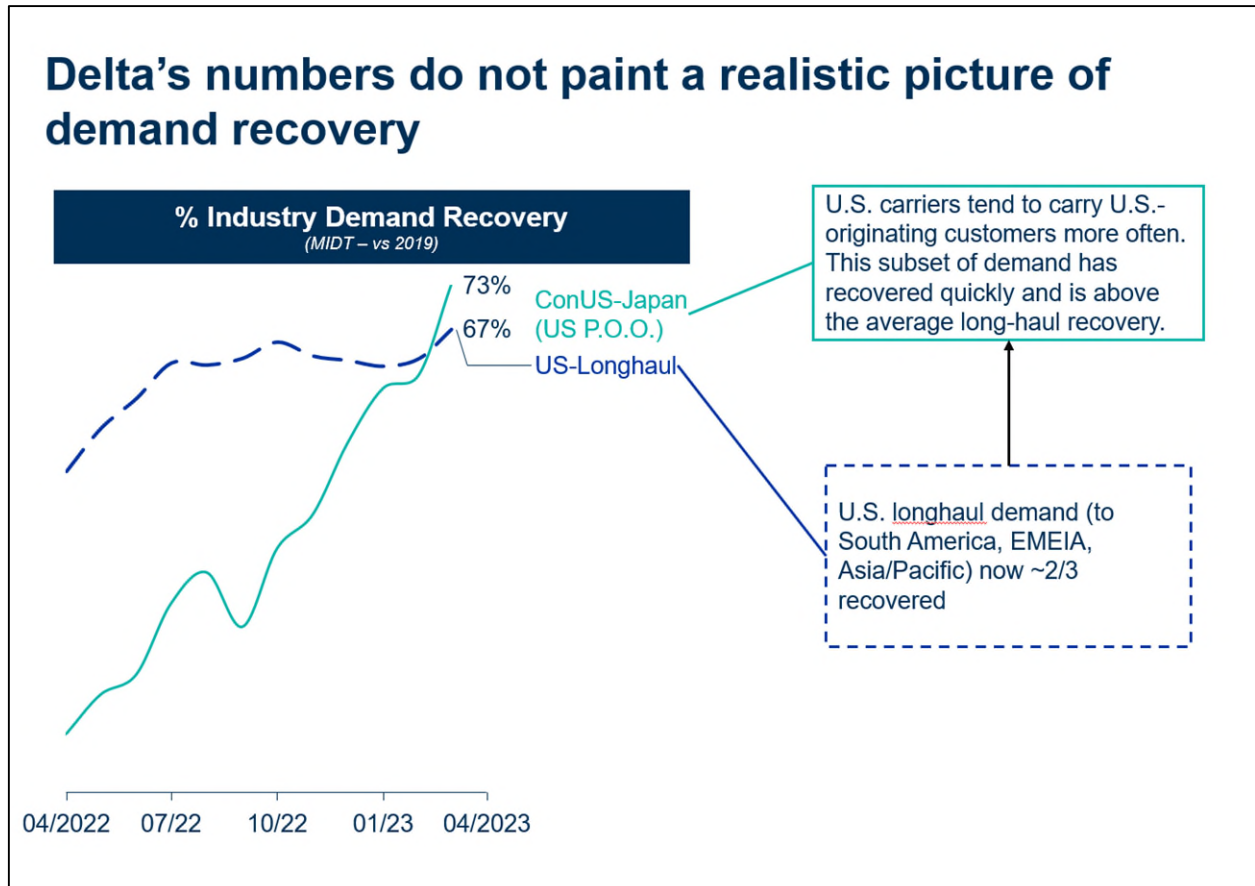
consideration. Should Hawaiian also file a pleading that contradicts long-standing Department precedent, United is on record now objecting to Hawaiian. United also requests that the Department require U.S. carriers that will not be prepared to operate their Tokyo Haneda slot pairs at termination of Japan's Haneda-only slot waiver, tentatively set to expire this July, to notify the Department now so that the slot pairs can be reallocated to carriers like United that stand ready to use these valuable assets.

Finally, United confirms to the Department that it stands ready, with the support of its gateways, to adjudicate this matter in a Department-administered carrier selection proceeding to reallocate the two slot pairs Delta is seemingly challenged to use to their maximum value.

United provides letters from the Mayor of Houston and the Governor of Guam, who stand together with United in objecting to what is being proposed by Delta, American, and potentially Hawaiian. These letters of support for United's position are filed in Exhibit A.

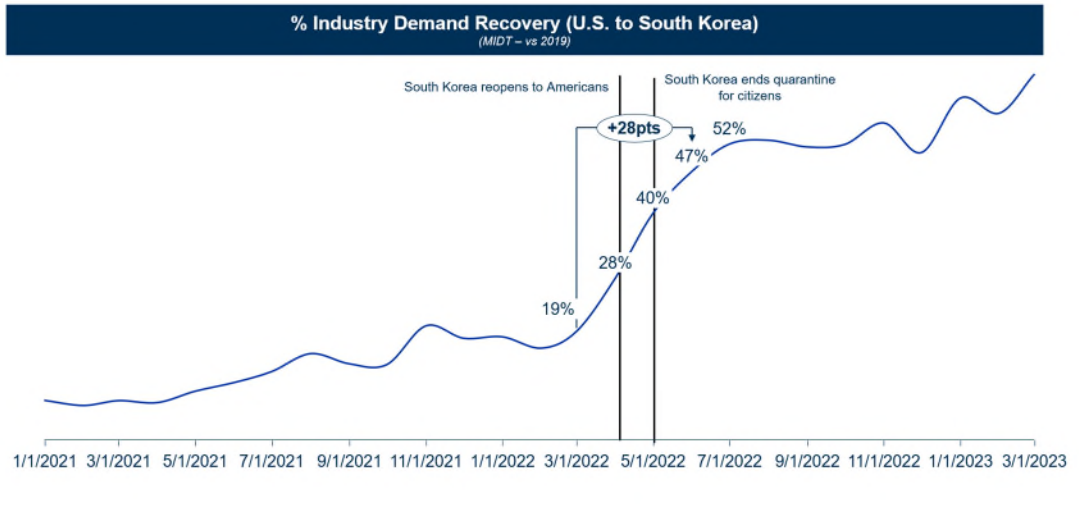
A. Delta Does Not Paint a Realistic Picture of U.S.-Japan Demand Recovery

There is no doubt that the COVID pandemic was unprecedented and that the repercussions are still being felt. However, Delta's depiction of the current demand recovery environment is not entirely accurate. In reality, U.S. carriers tend to carry U.S. originating customers more often and this subset of demand is 73% recovered, which is above an average long-haul flight demand recovery of 67%. Delta obscures this fact by including data in its pleading that includes U.S. *and* Japan originating customers. Naturally, Japan origin traffic remains lower than that of U.S. travelers but Japan in late April just fully opened with the final draw-down of its COVID protocols. The reason Delta decided to hide this segregation of demand data, likely, is to mislead the Department into thinking the demand environment Delta faces is less robust than it actually is.

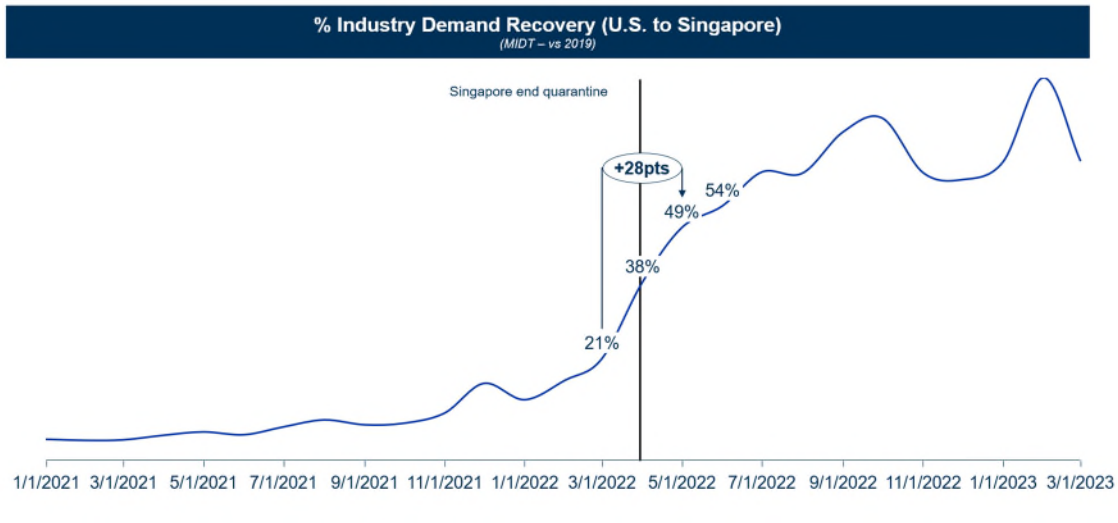


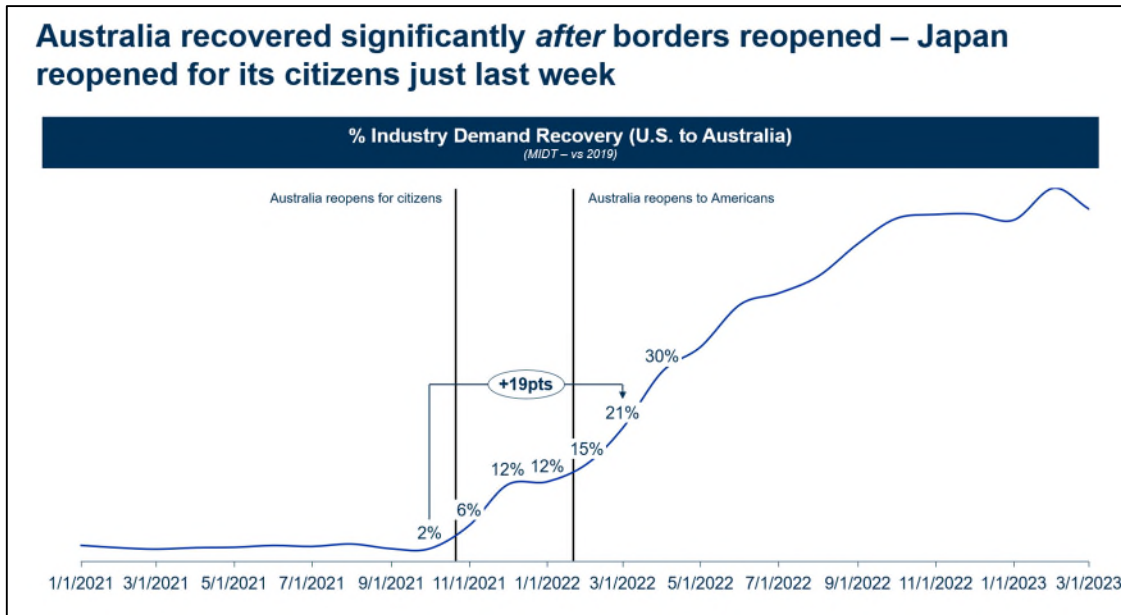
In addition, historic precedent in the Asia/Pacific region shows that international travel experiences a sharp increase once COVID restrictions are lifted. With these restrictions fully lifted in Japan as of April 28, 2023, we can reasonably expect the upward trend of demand recovery in Japan to continue and accelerate, just as it did in South Korea, Singapore, and Australia, for example. The below three charts show the significant increase in demand recovery after restrictions were lifted in these foreign jurisdictions. Specifically, South Korea and Singapore demand increased 28 points shortly after their COVID restrictions dropped. Australia saw a 19-point increase.

South Korea recovered significantly *after* borders reopened – Japan reopened for its citizens just last week



Singapore recovered significantly *after* borders reopened – Japan reopened for its citizens just last week





As such, current conditions and the expected upward trend of demand recovery following the lifting of COVID restrictions do not warrant the extreme recourse that Delta and American suggest. And for the avoidance of doubt, United is anticipating a full return of demand in Summer 2023 and thereafter. United is operating its network of Japan flights and specifically its five Haneda slot pairs. United does not see a need for, nor does it support, calls for potential extensions of current Tokyo Haneda dormancy and slot waivers. United also takes this opportunity to confirm the reinstatement of its Los Angeles – Tokyo Narita service effective October 28, 2023.

With the above facts clarified by United, it would be wrong for the Department to entertain Delta's proposal and not use the tried and trusted Department process of a carrier selection proceeding to allocate Delta-held languishing Haneda slot pairs.

B. The Public Interest Requires that the Department Deny Delta’s Fiscally Driven Proposal

Delta’s proposal is without merit and is totally arbitrary. But what is for certain is that Delta’s proposed pilot program is tailor-made to benefit Delta’s financial performance (and, presumably, also that of American, though that is unclear from its abridged answer). Delta has not provided any basis for its cherry-picked selection of two slot pairs for “limited flexibility,” nor why exactly a three-year trial period is necessary.

One can surmise Delta picked two slot pairs for its pilot program because Delta is not operating two Haneda routes in this ongoing waiver period. United holds five Haneda slot pairs and is operating all five. Delta holds seven slot pairs and is not operating Portland and Honolulu – this is presumably where the two-slot pair proposal comes from. See chart below.

HND		
<i>(May 2023 Schedule – Source: Dijio)</i>		
Carrier	Total Slots	In Use
U.S.		
UA	5	5
DL	7	5 ¹
AA	3	3
HA	3	1 ²

1. DL resumes PDX and HNL in Oct
2. HA ramps up slot usage from Aug to Nov

And regarding the proposed three-year time frame of the Delta pilot program, one can assume the only basis is that Delta’s commercial teams have forecasted that the airline’s most underperforming Haneda routes will have better prospects of financial returns in three-years’ time.

Further, Delta is already acting as if it will not operate again between Portland and Tokyo Haneda. Certainly, Delta can take advantage of current dormancy and slot waivers issued by the U.S. and Japan. But effective at the end of summer, and as displayed in the table below from Delta’s website, Delta every day is offering a lowest fare of \$10,667 round-trip for Portland – Tokyo Haneda. This is not pricing to remain competitive. This is pricing to limit an influx of bookings and suggestive of a forthcoming service reduction. For comparison, and based on United’s website (May 5, 2023), United’s lowest round-trip fare for San Francisco – Haneda on November 12 with return November 19 is \$1,509. United’s lowest round-trip fare Portland – Haneda via connections at San Francisco on these same November travel dates is \$1,888.

	Sun, Nov 12	Mon, Nov 13	Tue, Nov 14	Wed, Nov 15	Thu, Nov 16	Fri, Nov 17	Sat, Nov 18
Sun, Nov 05	LOWEST \$10,667	LOWEST \$10,667	LOWEST \$10,667	LOWEST \$10,667	LOWEST \$10,667	LOWEST \$10,667	LOWEST \$10,667
Mon, Nov 06	LOWEST \$10,667	LOWEST \$10,667	LOWEST \$10,667	LOWEST \$10,667	LOWEST \$10,667	LOWEST \$10,667	LOWEST \$10,667
Tue, Nov 07	LOWEST \$10,667	LOWEST \$10,667	LOWEST \$10,667	LOWEST \$10,667	LOWEST \$10,667	LOWEST \$10,667	LOWEST \$10,667
Wed, Nov 08	LOWEST \$10,667	LOWEST \$10,667	LOWEST \$10,667	LOWEST \$10,667	LOWEST \$10,667	LOWEST \$10,667	LOWEST \$10,667

Wed, Nov 08 - Wed, Nov 15 | Non Stop
From \$10,667

[CONTINUE](#)

Source: Delta website on May 4, 2023, referencing fare availability in November 2023

Delta has not – and cannot – demonstrate that any consumer or community benefits will accrue from its request. Indeed, unknown and unexamined U.S. gateways that can change at the whims of the carrier and without any public review will inherently place consumers, communities, and shippers second to carriers’ self-interest. It would be irresponsible for the Department to delegate away its authority to adjudicate public benefits determinations for the slot pairs and

subject consumers to Delta's experimentation with maximizing profits for its network at consumers' expense.

The Department previously denied requests for gateway flexibility in the Haneda context and should remain consistent here to avoid undermining its own past processes and selections.⁷ In so denying, the Department has said that gateway flexibility "would introduce a complex and controversial element to the Department's standard approach to deciding carrier selection proceedings."⁸ Delta has not provided any information to support a deviation from the Department's firmly established precedent.

C. The Department Should View Delta's Proposal with Skepticism Given its Operating History at Haneda

Given Delta's checkered history at Haneda, the Department should view with skepticism its proposal or else risk permitting carriers the unfettered ability to hoard slots that may be better suited elsewhere to maximize public benefits. As Maya Angelou said, "When someone shows you who they are, believe them the first time." Delta has time and time again shown who it is and that its motivations at Haneda are to maximize profits and not benefit consumers, communities, and shippers. Specifically, regarding Tokyo Haneda, Delta has:

- Failed to deliver on capacity commitments to the public by downgauging aircraft;⁹

⁷ See DOT Order 2019-2-5 at 6 (Feb. 7, 2019), Docket DOT-OST-2016-0048; DOT OST-2019-0014 (denying Delta's motion for U.S.- Haneda gateway flexibility); see also DOT Order 2018-11-5 (November 9, 2018) (denying American's motion for U.S.- Cuba gateway flexibility).

⁸ See DOT Order 2019-2-5 at 6 (Feb. 7, 2019).

⁹ See Final Order, *2010 U.S.-Haneda Combination Services Allocation Proceeding*, Docket DOT-OST-2010-0018 (June 14, 2015), at 11-12 (discussing Delta's "virtual abandonment of the route for a full traffic season and the resulting loss of the positive attributes of the Seattle-Haneda service" as well as imposing conditions on Delta's slots).

- Hoarded unused slots in an effort to avoid returning them to the pool, in an affront to the Department’s dormancy rules;¹⁰
- Threatened to terminate its Minneapolis-Narita service to garner community support for Minneapolis-Haneda;¹¹
- Abandoned and equivocated on its stated commitments to routes/gateways.¹²

The Department should not countenance Delta’s proposal without considering the public benefits to consumers or the public benefits of other carriers’ proposals for the same slots. And given Delta’s – and seemingly American’s – lack of commitment to the market, the Department should reconsider awarding back-up authority for their underutilized slots, which is something United has and continues to advocate for.¹³ United reiterates its long-standing willingness to accept backup authority now and/or in any future Tokyo Haneda carrier selection proceeding with a condition permitting it to implement the authority within the first year should the primary carrier withdraw from the market.

D. United is Prepared to Demonstrate the Many Public Benefits of its Gateways

Rather than granting Delta’s proposal for a self-serving, risky “pilot program” scheme, the Department should institute a carrier selection proceeding for the two slot pairs that are evidently no longer being fully utilized by Delta. As the Department noted in its 2019 Final Order, “[s]hould any of the selected carriers not begin or maintain their proposed services, the Department believes,

¹⁰ See Final Order, 2010 U.S.-Haneda Combination Services Allocation Proceeding, Docket DOT-OST-2010-0018 (June 15, 2015), at 11.

¹¹ See Application of Delta Airlines, Docket DOT-OST-2016-0048 (April 21, 2016), at 19 (“However, Delta’s current projections showing increasing passenger demand for service to Haneda Airport suggest that NRT service from MSP will not be sustainable”).

¹² See, e.g., Slot Return of Delta Air Lines, Docket DOT-OST-2010-0018 (June 17, 2015); see also Final Order, (discussing Delta’s “virtual abandonment of the route for a full traffic season and the resulting loss of the positive attributes of the Seattle-Haneda service” as well as imposing conditions on Delta’s slots due to its unreliable history).

¹³ See Comments of United at 3 (May 30, 2019), Docket DOT-OST-2019-0014.

as it has in previous proceedings, that the public interest would be best served by awarding those unused rights on the basis of a fresh record and in light of the circumstances presented at that time.”¹⁴ A review of the fresh record would make the best use of Haneda slots that are being underutilized.

While United would be prepared to engage in a carrier selection proceeding to demonstrate the merits of any proposal, United agrees that one may not be necessary here given that there are already proven gateways within United’s network that are available and interested in using the slots – e.g., Houston and Guam.¹⁵ United has previously presented compelling information in favor of these proposed gateways, which ultimately were not selected in the 2019 Haneda carrier selection proceeding and United has indicated its interest in being considered for backup authority if a carrier ceases use of Haneda slot(s).¹⁶ United has no doubt the public interest would be better served by its proposals. As noted already, the Mayor of Houston and the Governor of Guam have both voiced their support for United in objecting to Delta’s proposal and for United engaging in a carrier selection proceeding to secure service for United operated Houston-Haneda and Guam-Haneda. *See* Letters of Support, attached as Exhibit A.

The Department should not overlook these previously proposed gateways and their demonstrated public benefits in Delta’s haste to gain a unilateral ability to select unvetted gateways that may provide lesser benefits than past proposals. Delta may claim it doesn’t want to

¹⁴ *See* DOT Order 2019-8-6 at 9 (Aug. 9, 2019), Docket DOT-OST-2019-0014.

¹⁵ *See* Application of United Airlines, Inc. (Feb. 21, 2019), Docket DOT-OST-2019-0014.

¹⁶ Comments of United at 3 (May 30, 2019), Docket DOT-OST-2019-0014.

“undermine or nullify” the Department’s prior determinations or “substitute its own self-interest” for the Department’s but make no mistake: Delta is asking for permission to do exactly that.¹⁷

If allowed, Delta or American would have the liberty of using the limited Haneda slots for a U.S.-Haneda route that is potentially smaller than a United hub city to Haneda. They could institute unbeneficial nonstop service from an already existing gateway, which does not enhance time-of-day flight coverage or which undermines the number of U.S. cities that would have a single connection service to Haneda. Any of these actions would not enhance or expand the service options consumers and communities would have between the U.S. and Tokyo Haneda.

E. The Department Should Deny Delta’s Gateway Flexibility Proposal as It Has Done Before and Institute a Carrier Selection Proceeding

Delta has repackaged its earlier proposal for Haneda gateway flexibility¹⁸ but the fundamentals remain the same. Delta again cites to the Department’s statutory obligations and an unrelated and inapplicable twenty-year old Brazil precedent, but these are all arguments that the Department has already considered and rejected.¹⁹ The fact is that overturning decades of Department policy as well as years of hard work in selecting carriers and gateways in prior Haneda dockets is not in the public interest.

Among the 16 public interest factors that the Secretary must consider, in addition to the two that Delta cherry-picked in its motion, is 49 U.S.C. § 40101(a)(7): “developing and maintaining a sound regulatory system that is responsive to the needs of the public....” In pushing for its pilot program, Delta asks the Department to effectively overturn the regulatory system that

¹⁷ See Motion of Delta Air Lines at 10 (May 1, 2023), Docket DOT-OST-2019-0014.

¹⁸ See Motion of Delta (Dec. 19, 2018), Docket DOT-OST-2016-0048.

¹⁹ See DOT Instituting Order, Order 2019-2-5 at 6 (Feb. 7, 2019), Docket DOT-OST-2019-0014.

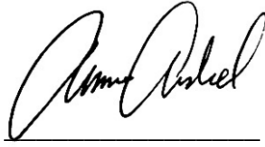
has been in place for decades that ensures scarce slots are put to their highest and best use for the public. Even the Department has held that competitive proceedings require the “expending of carrier and Department resources, time lost, uncertainty for both communities and consumers, and winners and losers,” and that the Department “would not look favorably on future conduct that undermined the Department’s process or the selections it made.”²⁰ Approving Delta’s experimental program would certainly be undermining the Department’s process and previous selections at the expense of the public interest, “introduce a complex and controversial element to the Department’s standard approach to deciding carrier selection proceedings,”²¹ and would be inconsistent with Department policy.

WHEREFORE, United requests that the Department deny Delta’s Motion and proposal for a pilot program granting limited gateway flexibility in U.S.-Haneda and instead continue to use its long-standing procedures to adjudicate access to limited entry routes in a manner that maximizes the public interest. The Department should equally disregard American’s Answer and the Department should require airlines to advise now if they will not operationalize Tokyo Haneda slot pairs once Japan’s Haneda-only slot waiver ends this summer, as tentatively scheduled. United stands ready with its gateway cities of Houston and Guam to participate in a carrier selection proceeding in order to best place the two Delta slot pairs that are evidently failing in their existing uses.

²⁰ See DOT Order 2016-7-14 at 9 (Jul. 20, 2016), Docket DOT-OST-2016-0048).

²¹ See DOT Instituting Order, Order 2019-2-5 at 6 (Feb. 7, 2019), Docket DOT-OST-2019-0014.

Respectfully submitted,

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

Amna Arshad
Freshfields Bruckhaus
Deringer LLP

Counsel for
United Airlines, Inc.

May 8, 2023

CERTIFICATE OF SERVICE

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

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Anna Arshad

May 8, 2023

EXHIBIT A



CITY OF HOUSTON

Office of the Mayor

Sylvester Turner

Mayor

P.O. Box 1562
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Telephone – Dial 311
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May 4, 2023

The Honorable Peter Buttigieg
Secretary
Department of Transportation
1200 New Jersey Avenue, SE
Washington, DC 20590

Re: Tokyo Haneda Air Service

Dear Secretary Buttigieg:

I am writing in strong support of nonstop United Airlines, Inc. (United) air service between Houston and Tokyo Haneda Airport (Haneda) and in opposition to Delta Air Lines' motion to allow airlines to unilaterally move some of their Haneda flights.

As you are likely aware, the U.S. Department of Transportation (DOT) conducted a thorough carrier selection proceeding in 2019 to award communities and airlines additional Haneda flights, and after reviewing statutory public interest criteria. I personally supported United getting a flight from Houston to Haneda and I was disappointed with the DOT's decision to exclude Houston in the 2019 proceeding.

Now, to allow Delta - or any airline - to unilaterally move Haneda flights stands contrary to the DOT's authority and duty to oversee allocations of limited air service rights in a fair, transparent, and effective manner. What Delta proposes, regrettably, does not give me comfort that Houston would be on a level playing field with other U.S. cities for another allocation of Haneda flights.

I support United on this matter as it aims to expand its current list of cities that have Tokyo Haneda service, including Houston. United's pleading indicates it is willing and able to immediately put into operations Haneda slot pairs that Delta seems to be struggling to use effectively. United also says it is ready to engage the DOT in another DOT administered carrier selection proceeding which I believe would give Houston an equal chance against cities Delta may select for more Haneda flights.

Having said the above, I encourage the DOT to reject the Delta motion and undertake the steps you deem necessary to institute a carrier selection proceeding. This is the best way to ensure fairness and equity in allocation of Tokyo Haneda slots.

Sincerely,

Sylvester Turner
Mayor

LOURDES A. LEON GUERRERO
GOVERNOR



JOSHUA F. TENORIO
LT. GOVERNOR

May 5, 2023

UFISINAN I MAGA'HÅGAN GUÅHAN
OFFICE OF THE GOVERNOR OF GUAM

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

Re: Tokyo Haneda Air Service

Hafa Adai Secretary Buttigieg,

I am writing in strong support of United Airlines, Inc. (“United”) nonstop air service between Guam and Tokyo Haneda Airport (“Haneda”).

I am informed that, in 2019, the U.S. Department of Transportation (“DOT”) conducted a thorough carrier selection proceeding to award communities and airlines additional Haneda flights. Based on the statutory public interest criteria in the 2019 proceeding, Guam strongly supported a United application to fly between Guam and Haneda. Unfortunately, Guam was not selected at that time.

I understand that, since the 2019 selection proceeding, another airline has submitted a motion to allow airlines awarded Haneda flights to unilaterally move their flights to other cities, regardless of whether such cities already enjoy Haneda service or participated in the 2019 proceeding. While I expect that this motion, if granted, would yield substantial short-term fiscal benefits for affected airlines, it would cause great detriment to the residents and businesses of the selected cities, which benefit from the economic opportunity these flights represent. While I understand that the motion, if it carries, would enable United itself to unilaterally transfer an existing Haneda flight to Guam, such actions would unfairly deprive another community of the important consumer and community benefits it derives from that flight.

I support United’s efforts to expand its current list of cities that have Tokyo Haneda service to include Guam. I understand United has the capacity to immediately operationalize Haneda slot pairs not presently effectively utilized by other airlines. United has also informed me it is prepared to engage in another DOT administered carrier selection proceeding to seek the DOT’s consideration of awarding Guam a Tokyo Haneda flight.

I encourage the DOT to deny the motion for unilateral airline transfer of Haneda flights, undertake the necessary steps to institute a carrier selection proceeding, and give full consideration to Guam-Tokyo Haneda service.

Senseramente,

LOURDES A. LEON GUERRERO

Maga'hågan Guåhan
Governor of Guam

cc: Joshua F. Tenorio, *Sigundo Maga'låhen Guåhan*, Lt. Governor of Guam