

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

Application of)	
)	
PHILIPPINE AIRLINES, INC.)	Docket DOT-OST-2026-0892
)	
for an Exemption pursuant to 49 USC § 40109)	
(Manila-Chicago O'Hare))	
)	

**ANSWER OF
DELTA AIR LINES, INC.**

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March 11, 2026

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**ANSWER OF
DELTA AIR LINES, INC.**

Delta Air Lines, Inc. (“Delta”) ¹ hereby submits this Answer in response to the application of Philippine Airlines, Inc. (“PAL”) seeking authority to provide scheduled foreign air transportation of persons, property, and mail between Manila, Philippines, and Chicago, Illinois. For the reasons set forth below, Delta respectfully urges the Department to defer action on PAL’s application until Delta’s entry is assured by the Philippine Government.

I. DELTA DOES NOT OPPOSE PAL’S APPLICATION IN PRINCIPLE

Delta does not oppose PAL’s requested authority in principle. Delta recognizes that expanded service between the United States and the Philippines can provide public benefits, including enhanced consumer choice and increased trade and tourism between the two countries.

Delta is likewise committed to advancing these same public interest objectives. In furtherance of that goal, Delta is pursuing plans to launch its own Manila service next summer (2027) with daily Airbus A350-900 service from Los Angeles (LAX). Delta’s service would provide additional competition, new routing options, and expanded connectivity for U.S. and Philippine consumers alike. However, those benefits can only be fully realized if U.S. and Philippine carriers are afforded a level and reciprocal opportunity to access Manila on commercially viable terms.

¹ Common names are used for airlines and government entities.

II. LACK OF RECIPROCAL ACCESS AT MANILA UNDERMINES FAIR COMPETITION

Despite the clear intent of the U.S.–Philippines Air Transport Agreement to ensure fair and equal opportunity,² Delta—like other U.S. carriers—continues to face significant barriers to obtaining commercially viable slots, gates, and related airport infrastructure at Manila necessary to launch and sustain nonstop service.

At the same time, Philippine carriers have been able to expand their presence in the U.S. market, through new nonstop services and increased frequencies at major U.S. gateways including, most recently, launching Manila-Seattle nonstop service. In this docket PAL now requests further incremental authority for Manila-Chicago (ORD) service from the Department. Granting PAL additional U.S. authority while U.S. carriers remain unable to obtain reciprocal access at Manila would further entrench an uneven competitive landscape and would be inconsistent with the Department’s longstanding policy of promoting fair competition.

III. PUBLIC INTEREST AND DEPARTMENT PRECEDENT SUPPORT DEFERRAL

Delta submits that it is in the public interest to grant additional authority for expanded U.S.–Philippines service only after Delta and the U.S. Government received written assurances from the Philippine Government that Delta’s planned Manila service will receive necessary, commercially viable slots and infrastructure access at Manila. Acting on PAL’s application before Manila access issues are resolved would undermine the Department’s statutory mandate to ensure competitive fairness³ and would be contrary to the spirit and intent of the bilateral air transport agreement, as described above.

The Department has, in prior proceedings, appropriately deferred action on foreign carrier applications where U.S. carriers were denied the practical ability to exercise their bilateral rights,⁴

² Air Transport Agreement between the U.S. and the Philippines (Sep. 16, 1982), as amended by Protocol of November 20, 1995 (“U.S.-Philippines ATA”)

³ See, 49 U.S.C. § 40101(a)(15).

⁴ See, e.g., Objection of American Airlines, Inc. to Application of Air China Limited d/b/a Air China for Renewal of Exemption Authority (Jan. 30, 2017), Docket DOT-OST-2013-0001; *and*, Conditional Objection of Delta Air Lines (May 4, 2016), Docket DOT-OST-2016-0070.

including in the past with exemption applications by PAL.⁵ Delta's request for deferral here is fully consistent with that precedent and squarely within the Department's authority.

IV. DELTA SEEKS DEFERRAL, NOT DENIAL

Delta emphasizes that it is not requesting denial of PAL's application at this time. Rather, Delta respectfully asks the Department to defer action until Delta and the U.S. Government receive written assurances from the Philippine Government that the slots and airport access necessary to implement planned Manila service will be available on commercially viable terms. Resolving these access constraints would allow both U.S. and Philippine carriers to expand service in a manner that truly advances consumer welfare, competition, and the objectives of the U.S.–Philippines Air Transport Agreement.

WHEREFORE, for the reasons outlined above, Delta respectfully requests that the Department defer action on Philippine Airlines' Application for authority to provide Manila–Chicago (O'Hare) service until the Philippine Government is able to assure reciprocal access for Delta at Manila.

Respectfully submitted,



Christopher Walker
Director – Regulatory Affairs
DELTA AIR LINES, INC.

⁵ See, Answer of United Airlines, Docket DOT-OST-2019-0156 (Nov. 15, 2019); *and* Answer of United Airlines, Docket DOT-OST-2020-0012 (February 10, 2020).

CERTIFICATE OF SERVICE

On this 11th day of March 2026, a copy of the foregoing Answer of Delta Air Lines, Inc. was served by electronic mail on the following:

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