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Mr. Paul Gretch  
Director, Office of International Aviation  
U.S. Department of Transportation  
1200 New Jersey Avenue SE  
Washington, DC 20590

**Re: U.S.-Haneda Final Order 2015-6-14  
Docket DOT-OST-2010-0018**

Dear Mr. Gretch:

We appreciate the Department's decision in Order 2015-6-14 to allow the Seattle-Haneda slot to remain with Delta. Delta has worked hard to develop Seattle-Haneda service under the difficult operating conditions imposed by the U.S.-Japan bilateral agreement, and we have relied on dormancy rights to adjust our services in response to seasonal market conditions. However, we understand the Department in Order 2015-6-14 to be recommending that carriers return Haneda slots to DOT if operating them on a year-round, daily basis is not commercially feasible.

We have determined that it is not commercially feasible to operate the slots allocated to Delta for Seattle-Haneda service on a consistent daily basis year-round because: (i) demand for Seattle-Haneda service is highly variable, peaking in the summer and declining in the winter; and (ii) Delta lacks a Japan airline partner to provide connectivity beyond Haneda to points in Japan and other countries in Asia. While Delta would prefer to continue to develop Seattle-Haneda service in competition with the American/JAL and United/ANA alliances at Haneda, Delta will follow DOT's guidance in Order 2015-6-14 and return the slots to DOT.

In order to provide a smooth transition and avoid disruption to currently booked passengers, Delta plans to operate Seattle-Haneda service under the terms of the Order through September 30, 2015, when our last eastbound flight will depart Haneda for Seattle. We will then return the slots to the Department for reallocation effective October 1, 2015. Due to currently booked loads, it is not possible to re-accommodate passengers who are booked on flights before that date. In addition, we will dismiss the pending D.C. Circuit litigation, which is currently subject to an abeyance order.

Every U.S. carrier serving Japan will now have one pair of Haneda slots. Delta remains strongly opposed to any further changes to the Haneda operating rules unless and until Japan is willing to open the airport under normal open skies terms and allow Delta to relocate its Tokyo hub operation to the preferred airport. Any incremental or phased deal effective before then would

be harmful and unfair to Delta as a Narita hub operator. Accordingly, we urge the U.S. government to aggressively pursue a full opening of Haneda to allow fair and equal access by U.S. carriers and their customers.

Sincerely,

A handwritten signature in dark ink, appearing to read "A. Van der Bellen". The signature is fluid and cursive, with the first letters of the first and last names being capitalized and prominent.

Alexander Van der Bellen

cc: Brian Hedberg  
Ben Taylor  
Thomas Engle  
Steve Cristina  
Eugene Alford