

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

_____)
Joint Application of)
)
 SOCIÉTÉ AIR FRANCE) Docket DOT-OST-2002-13958
 and)
 ALITALIA – Compagnia Aerea Italiana)
 S.p.A.)
)
 for blanket statements of authorization)
_____)

COMMENTS OF UNITED AIR LINES, INC.

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DATED: May 21, 2009

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Dated: May 20, 2009

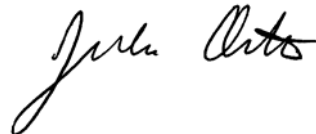
COMMENTS OF UNITED AIR LINES, INC.

By their May 18, 2009 Notice, Alitalia and Air France seek to expedite the effectiveness of Alitalia/Air France code-share services in the Paris-Philadelphia market. Normally, such a request would be granted as a matter of course since both carriers are from Open-Skies countries. In this case, however, one of the parties (Alitalia) is the flag carrier of a country that, for over nine years, has discriminatorily denied access to Milan's Linate Airport to U.S. carriers seeking to offer code-share services to U.S. origin & destination (O&D) traffic on flights operated by their code-share partners between Linate and connecting points in Europe. United is uncertain when this problem will be resolved and is concerned that United continues to be denied code-share access to an otherwise Open-Skies point while its competitors make full use of rights available under the U.S.-EU Open-Skies Agreement.

In fact, during the US-EU Joint Committee meetings held in February, the EU and Italy were unable to offer a resolution of this issue by the March 30, 2009 deadline set by the United States. In a letter dated March 30, 2009, the EU suggested that a resolution would be forthcoming under which U.S. carriers would be able to offer code-share service to Linate for U.S. O&D traffic, but not until the end of June 2009 at the earliest, due to the need of Italy for more time to formulate such a resolution. A Joint U.S.-EU Committee meeting has been scheduled on June 24, 2009, to resolve this long-standing issue of discriminatory treatment.

Given Italy's continued delay in allowing nondiscriminatory U.S. carrier code-share access to Linate Airport, DOT should decline to allow Alitalia and Air France to expedite implementation of their Paris-Philadelphia code-share service. Moreover, before allowing that service to take effect on the full 30 days' notice, DOT should ensure that neither Alitalia nor Air France will use that or any other code-share service to carry Linate-Philadelphia traffic under either carrier's designator code.

Respectfully submitted,



JULIE OETTINGER
Managing Director – International &
Regulatory Affairs
UNITED AIR LINES, INC.

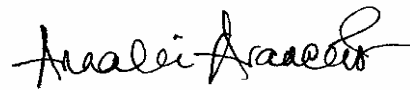
DATED: May 21, 2009

CERTIFICATE OF SERVICE

I hereby certify that I have this date served a copy of the foregoing document on all persons named below by causing a copy to be sent via e-mail.

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