

BEFORE THE
DEPARTMENT OF TRANSPORTATION
WASHINGTON, D.C.

Application of	:	
	:	
MN Airlines, LLC d/b/a	:	
SUN COUNTRY AIRLINES	:	
	:	Docket DOT-OST-2016-0021
For an exemption pursuant to	:	
49 U.S.C. §40109 to provide scheduled service	:	
between the United States and Cuba and Order	:	
2016-2-12 for allocation of newly available	:	
frequencies between the United States and Cuba	:	

**APPLICATION OF MN AIRLINES LLC,
D/B/A SUN COUNTRY AIRLINES
FOR AN EXEMPTION AND ALLOCATION OF FREQUENCIES**

Communications with respect to this document should be addressed to:

Thomas W. Ting
General Counsel
MN Airlines, LLC
1300 Mendota Heights Road
Mendota Heights, MN 55120
Telephone: (651) 905-2729
Fax: (651) 681-3911
thomas.ting@suncountry.com

March 2, 2016

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**APPLICATION OF MN AIRLINES LLC,
D/B/A SUN COUNTRY AIRLINES
FOR AN EXEMPTION AND ALLOCATION OF FREQUENCIES**

MN Airlines, LLC d/b/a Sun Country Airlines (Sun Country), pursuant to 49 U.S.C. §40109 and Order 2016-2-12 (2016 U.S.-Cuba Frequency Allocation Proceeding), hereby applies for an exemption order and allocation of frequencies to provide year-round, scheduled foreign air transportation of persons, property and cargo between Minneapolis/St. Paul (MSP) and Havana (HAV), 1-stop via Fort Myers, Florida (RSW), year-round nonstop service between RSW and HAV, and winter seasonal service between Minneapolis/St. Paul (MSP) and Santa Clara (SNU) and Matanzas (VRA) Cuba and a year-round, non-stop between MSP and HAV.

Sun Country proposes to commence twice-a-week, Friday and Monday, year-round scheduled service from Minneapolis/St. Paul International Airport (MSP) with one stop at Southwest Florida International Airport (RSW) to Havana's José Martí International Airport (HAV) on Friday, November 11, 2016. Sun Country would further like to commence once-a-

week Saturday, seasonal service from MSP to Juan Gualberto Gomez Airport in Matanzas, Cuba (VRA) on Saturday, December 17, 2016 through April 29, 2017, and once-a week seasonal service from MSP to Abel Santamaria Airport in Santa Clara (SNU) on Sunday, December 18, 2016 through April 30, 2017. Sun Country also proposes a second, twice-a-week, Saturday and Sunday, year-round scheduled service from MSP to HAV to commence on Saturday, December 17, 2016.

Sun Country will provide this new service utilizing Boeing 737-800 aircraft with 162 seats or Boeing 737-700 aircraft with 126 seats.

In support of this application, Sun Country submits the following:

Required Showings

1. Applicant. Sun Country is a Minnesota Limited Liability Company with its principal place of business at 1300 Mendota Heights Road, Mendota Heights, Minnesota 55120.
2. Citizenship. Sun Country is a citizen of the United States within the meaning of 49 U.S.C. § 40102 (15)(C). The president and more than two-thirds of the officers and directors of Sun Country are citizens of the United States. At least 75 percent of Sun Country's voting stock is owned by citizens of the United States.
3. Fitness. Sun Country is presently engaged in scheduled air transportation of persons, property, and cargo pursuant to certificates of public convenience and necessity issued under Section 401 of the Federal Aviation Act. Sun Country is fit, willing and able to perform the foreign air transportation applied for herein. Sun Country has considerable experience serving Cuba from points within the U.S.

4. Aircraft. All Sun Country service to Cuba is provided using Boeing 737-800 and 737-700 aircraft. Sun Country's Boeing 737-800 aircraft have a total of 162 seats each with 12 first class seats included. The 737-700 aircraft have 126 seats also with 12 first class seats included. Cargo capacity is 18,540 pounds on the 737-800 and 11,4202 pounds on the 737-700.

5. Fuel Consumption. Sun Country's fuel consumption for this service would not exceed the ten million gallon threshold specified in Section 313.4 of the Department's regulations.

Evidentiary Requirements:

1. The attached proposed schedule for Sun Country's scheduled service between the U.S. and Cuba to commence on November 11, 2016 includes firm dates for instituting service, the days of the week for the proposed services and seasonal service where applicable. Flight numbers, complete routings, departure/arrival times, and cargo capacity are also included.
2. Sun Country's schedule is listed in order of preference. For Priorities #1 (MSP/RSW/HAV/RSW/MSP), #2 (MSP/VRA/MSP) and #3 (MSP/SNU/MSP) Sun Country's minimum frequency is proposed. For Priority #4 (MSP/HAV/MSP) Sun Country would accept a minimum of one frequency per week, Saturday or Sunday.
3. Between July 2013 and September 2015, Sun Country provided charter service for Cuba Travel Services (CTS) a tour operator based in Miami authorized to arrange trips to/from various cities in Cuba. Sun Country operated charter flights to Cienfuegos (CFG), Camaguey (CMW), Holguin (HOG), Santiago (SCU), Santa Clara (SNU) and Havana (HAV) from Miami (MIA), Tampa (TPA), and New York (JFK) during this time.

4. Sun Country would accept backup authority with a condition that permits DOT to implement the authority within the first year should the primary carrier withdraw from the market and, should the authority not be activated, the authority would expire at the end of one year.

Grant of this application is in the public interest because it will allow Sun Country Airlines to provide quality low fare airline service on the routes between Minneapolis/St. Paul and Ft. Myers, Florida in the United States and Havana, Santa Clara and Matanzas in Cuba.

WHEREFORE, Sun Country respectfully requests that the Department grant the exemption and allocation of frequencies as sought above and grant such other relief as the Department deems necessary and appropriate.

Respectfully submitted,



Zarir H. Erani
President and CEO
MN Airlines, LLC
d/b/a Sun Country Airlines
1300 Mendota Heights Road
Mendota Heights, MN 55120
Telephone: (651) 681-3900
Fax: (651) 681-3911
zarir.erani@suncountry.com



Sun Country Airlines, proposed service US-Cuba									
Priority #1 <u>MSP-HAV 1-stop, 2x weekly (Monday and Friday), year-round</u>									
<u>RSW-HAV nonstop, 2x weekly (Monday and Friday), year-round</u>									
	<u>Start Date</u>	<u>End Date</u>	<u>DOW</u>	<u>Flt #</u>	<u>Dept Arp</u>	<u>Arvl Arp</u>	<u>Dept Time</u>	<u>Arrv Time</u>	<u>Aircraft*</u>
	11-Nov-16	Open	1,5	703	MSP	RSW	6:50	11:50	B737
	11-Nov-16	Open	1,5	703	RSW	HAV	11:50	13:05	B737
	11-Nov-16	Open	1,5	704	HAV	RSW	14:05	15:20	B737
	11-Nov-16	Open	1,5	704	RSW	MSP	17:00	19:37	B737
Priority #2 <u>MSP-VRA (Juan Gualberto Gomez Airport in Matanzas, serving the city of Veradero) non-stop, Saturday only, winter season</u>									
	<u>Start Date</u>	<u>End Date</u>	<u>DOW</u>	<u>Flt #</u>	<u>Dept Arp</u>	<u>Arvl Arp</u>	<u>Dept Time</u>	<u>Arrv Time</u>	<u>Aircraft</u>
	17-Dec-16	29-Apr-17	6	705	MSP	VRA	7:00	11:40	B737
	17-Dec-16	29-Apr-17	6	706	VRA	MSP	12:40	15:25	B737
Priority #3 <u>MSP-SNU (Abel Santamaria Airport in Santa Clara) non-stop, Sunday only, winter season</u>									
	<u>Start Date</u>	<u>End Date</u>	<u>DOW</u>	<u>Flt #</u>	<u>Dept Arp</u>	<u>Arvl Arp</u>	<u>Dept Time</u>	<u>Arrv Time</u>	<u>Aircraft</u>
	18-Dec-16	30-Apr-17	7	707	MSP	SNU	6:40	11:40	B737
	18-Dec-16	30-Apr-17	7	708	SNU	MSP	12:40	15:45	B737
Priority #4 <u>MSP-HAV non-stop, Saturday and Sunday only, year-round</u>									
	<u>Start Date</u>	<u>End Date</u>	<u>DOW</u>	<u>Flt #</u>	<u>Dept Arp</u>	<u>Arvl Arp</u>	<u>Dept Time</u>	<u>Arrv Time</u>	<u>Aircraft</u>
	17-Dec-16	Open	6,7	701	MSP	HAV	7:25	12:00	B737
	17-Dec-16	Open	6,7	702	HAV	MSP	13:00	16:15	B737
	<u>* Aircraft</u>	<u>Fleet</u>	<u>Class of Svc</u>	<u>Cargo Cap(lbs)</u>					
		B737-800	12F/150Y=162	18,540					
		B737-700	12F/114Y=126	11,422					

CERTIFICATE OF SERVICE

I hereby certify that I served a copy of the foregoing Application of MN Airlines, LLC d/b/a Sun Country Airlines for an exemption and allocation of frequencies between the U. S. and Cuba on March 2, 2016 by e-mail or mail upon each of the following addresses:



Karen Erazo

SERVICE LIST

obrooks@naca.cc; agoerlich@ggh-airlaw.com; abigail.donovan@aa.com; amendelsohn@cozen.com;
anita.mosner@hklaw.com; Barbara.Russell@virginamerica.com; whcallaway@zsrlaw.com;
robert.cohn@hoganlovells.com; bob.kneisley@wnco.com; Robert.Letteney@delta.com;
rsilverberg@sbgdc.com; Robert.Wirick@aa.com; bruce.rabinovitz@wilmerhale.com; cbethke@airlines.org;
Charles.Donley@pillsburylaw.com; Charles.Hunnicut@thompsonhine.com; cjsimpson@zsrlaw.com;
Chris.Walker@delta.com; Chris.Pappaioanou@mesa-air.com; cefelts@fedex.com; dan.weiss@united.com;
dheffernan@cozen.com; dkirstein@yklaw.com; dpeterson@aci-na.org; don.casey@aa.com;
dhainbach@ggh-airlaw.com; dsmalls@ups.com; DDerco@eckertseamans.com;
edward.sauer@pillsburylaw.com; esahr@eckertseamans.com; Black@raa.org; gbleopard@fedex.com;
ggarofalo@ggh-airlaw.com; gmurphy@crowell.com; gpwicks@wicks-group.com; Howard.Kass@aa.com;
jmaddux@ggh-airlaw.com; jennifer.nowak@hklaw.com; Jeremy.Ross@alaskaair.com;
jamestello@earthlink.net; jcanny@amerijet.com; jyoung@yklaw.com; John Fredericksen;
jegillick@zsrlaw.com; john@mietuslaw.com; jrichardson@johnrichardson.com;
john.varley@virginamerica.com; jasilversmith@zsrlaw.com; jonathan.blank@klgates.com;
jonathan.echmalian@hoganlovells.com; romanow@pillsburylaw.com; Karen Erazo; KGlatz@airlines.org;
KHines@cozen.com; kquinn@pillsburylaw.com; kjackson@jetlaw.com;
kevin.montgomery@polaraircargo.com; Kyle.Levine@alaskaair.com; ldwasko@erols.com;
Leslie.Abbott@wnco.com; ldunn@xtraairways.com; mlbenge@zsrlaw.com; mwarren@crowell.com;
Mark.Arimoto@hawaiianair.com; matwood@sherblackwell.com; Megan.Lawrence@alaskaair.com;
mfrancesconi@ups.com; mgoldman@sbgdc.com; mroller@rollerbauer.com; nsspark@fedex.com;
npbreed@zsrlaw.com; Perkmann@dowlohn.com; pmurphy@gerchickmurphy.com;
patrick.rizzi@hoganlovells.com; patricia.snyder@thompsonhine.com; pdoell@naca.cc;
pmurphy@lop-murphy.com; rbtrinder@zsrlaw.com; rdaivson@eckertseamans.com;
robert.land@jetblue.com; russell.bailey@alpa.org; rpommer@atlasair.com; sametta.c.barnett@delta.com;
Scasey@ups.com; scott.mcclain@delta.com; sheryl.israel@hoganlovells.com; slacther@cozen.com;
salterman@cargoair.org; steve.morrissey@united.com; SSeiden@crowell.com;
tazewell.ellett@hoganlovells.com; Thomas.bolling@united.com; Thomas Ting;
tbrown@geminiairways.com; temerson@skywest.com; tgillies@southernair.com; vsmith@ggh-
airlaw.com; yrose@cargoair.org; brett.kruger@dot.gov

Via US Postal Service:

Mr. Jeffrey Hamiel, Executive Director/CEO
Minneapolis Airports Commission
Minneapolis/St. Paul International Airport
6040 28th Ave South
Minneapolis, MN 55450-2799

Lee County Port Authority
Southwest Florida International Airport
11000 Terminal Access Road, Ste 8671
Ft. Myers, FL 33913-8213