

**BEFORE THE
U.S. DEPARTMENT OF TRANSPORTATION
OFFICE OF THE SECRETARY
WASHINGTON, D.C.**

Application of)
)
)

SOUTHWEST AIRLINES CO.)

for an allocation of frequencies in the)
2016 U.S. – Cuba Allocation Proceeding)
_____)

Docket DOT-OST-2016-0021

**APPLICATION OF SOUTHWEST AIRLINES CO.
FOR AN ADDITIONAL DAILY FREQUENCY**

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April 25, 2017

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**APPLICATION OF SOUTHWEST AIRLINES CO.
FOR AN ADDITIONAL DAILY FREQUENCY**

Southwest Airlines Co. (Southwest)¹ hereby applies for one of the three daily U.S. - Havana (HAV) frequencies that will become available when Spirit and Frontier terminate their South Florida - HAV service on May 31, 2017 and June 4, 2017, respectively.² With this frequency, Southwest will provide one additional daily flight between Fort Lauderdale (FLL) and HAV, for a total of three daily FLL - HAV flights. Southwest proposes to begin this service no later than November 5, 2017, using either 143-seat 737-700 or 175-seat 737-800 aircraft.³ Southwest's large-jet, low-fare service will provide significant public benefits by offering consumers in South Florida and across the United States more travel options to HAV and an enhanced service pattern throughout the day.⁴

¹ Common names of carriers are used herein.

² See, e.g., <http://www.miamiherald.com/news/business/article144601199.html>

³ Exhibit WN-1 contains details of Southwest's service proposal.

⁴ Southwest is aware that JetBlue, Delta and American have each applied for a daily HAV frequency. Southwest objects to each of these applications to the extent they would prevent an allocation of the one daily frequency requested herein to Southwest.

Currently Southwest provides two daily FLL - HAV flights and one daily TPA - HAV flight. Southwest also provides twice daily FLL - Varadero (VRA) and once daily FLL - Santa Clara (SNU) service, all with mainline, large aircraft. As such, Southwest provides more frequencies and seats to Cuba from FLL than any other airline.⁵ In its initial application to the DOT Southwest applied for a total of six (6) daily FLL - HAV frequencies, illustrating its strong desire to provide convenient service and a robust schedule for consumers in the South Florida market. Consistent with its strong commitment to U.S. - Cuba air service, Southwest is one of the few airlines that has neither abandoned frequencies nor downgraded service on its awarded routes following the Department's allocation of frequencies on August 31, 2016.

In its Final Decision in this proceeding, the Department found that the high concentration of Cuban Americans living in South Florida justifies allocating a majority of available frequencies to that region. With Spirit's termination of two FLL - HAV flights and Frontier's cessation of its one MIA - HAV flight, South Florida will no longer receive the level of service intended by the Department, particularly from low cost carriers. Granting Southwest an additional daily FLL - HAV frequency to build on its success and investment in the market is the most effective way to address this deficit and ensure that the limited available HAV frequencies benefit consumers to the maximum extent possible.

As the preeminent U.S. low cost carrier, Southwest has demonstrated throughout this proceeding that its FLL - HAV flights serve the large Cuban American population in Southwest Florida effectively by offering a convenient, accessible and lower-fare alternative to service at MIA. As such, Southwest's service not only provides

⁵ Source: Diio Schedule Weekly Bank Structure Report, May 2017.

convenient flight options to South Florida travelers but disciplines fares at MIA, thereby ensuring a competitive U.S. - HAV marketplace.⁶ As with Southwest's existing service, the additional daily FLL - HAV frequency requested herein will produce significant consumer benefits via year-round, daily nonstop service on large aircraft as well as convenient one-stop flights to Cuba from numerous interior domestic U.S. cities over Southwest's extensive network at its FLL gateway.

For the reasons stated above and in its earlier pleadings, Southwest respectfully requests that the Department grant it one daily frequency to provide an additional FLL – HAV flight. This additional service will maximize public benefits by enhancing competition and providing low-cost travel options for U.S. - Cuba passengers.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Robert W. Kneisley", written over a horizontal line.

Robert W. Kneisley

April 25, 2017

⁶ See, e.g., Southwest Application, Sec. VI, filed March 2, 2017; Southwest Answer, Sec. I, filed March 14, 2017; Southwest Reply, Sec. I, filed March 21, 2017, in this docket.

CERTIFICATE OF SERVICE

I hereby certify that on April 25, 2017, a copy of the foregoing was served via e-mail on the following persons:

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Amanda Hoff

**Proposed Additional FLL - HAV
Daily Flight Schedule**

Flight #	9025		9026
Elapsed Time	1:20		1:20
Flight Times (all times local)	1430	FLL	1800
			
	1545	HAV	1650
Aircraft Type	737-700/800		737-700/800
Seats	143/175		143/175
Distance	255 miles		