

BEFORE THE
U.S. DEPARTMENT OF TRANSPORTATION
WASHINGTON, DC

_____)	
Application of)	
)	
NORWEGIAN AIR UK LIMITED)	Docket No. OST-2015-0261
)	
for an exemption under 49 U.S.C. § 40109)	
and a foreign air carrier permit pursuant to)	
49 U.S.C. § 41301)	
_____)	

ANSWER OF LABOR PARTIES TO
NORWEGIAN AIR UK LIMITED'S REQUEST FOR EXPEDITED PROCESSING

Edward Wytkind, President
Transportation Trades Department,
AFL-CIO
815 – 16th Street NW
Washington, DC 20006
Phone: 202-628-9262
Email: edw@ttd.org

Russell Bailey
David Semanchik
Air Line Pilots Association
1625 Massachusetts Avenue NW
Washington, DC 20036
Phone: 202-797-4086
Email: Russell.Bailey@alpa.org
David.Semanchik@alpa.org

Alex Garcia, Secretary-Treasurer and Air
Transport Division Director
Transport Workers Union of America
AFL-CIO
501 3rd St. NW - 9th Floor
Washington, DC 20001
Phone: 202-719-3870
Email: agarcia@twu.org

Sara Nelson, President
Association of Flight Attendants-CWA
501 3rd Street NW
Washington, DC 20001
Phone: 202-434-0574
Email: snelson@afacwa.org

**Sito Pantoja, General Vice President
International Association of Machinists
and Aerospace Workers
9000 Machinists Place
Upper Marlboro, MD 20772
Phone: 301-967-4596
Email: spantoja@iamaw.org**

**Philip von Schöppenthau,
Secretary General
European Cockpit Association
Rue du Commerce 20-22
B-1000 Brussels, Belgium
Phone: 32-2-705-3293
Email: pvs@eurocockpit.be**

Dated: January 3, 2017

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**ANSWER OF LABOR PARTIES TO
NORWEGIAN AIR UK LIMITED'S REQUEST FOR EXPEDITED PROCESSING**

The undersigned labor organizations ("the Labor Parties") do not oppose the request of Norwegian Air UK Limited ("NAUK") for "expedited processing . . . for a foreign air carrier permit" via the immediate issuance of an order to show cause.

December 21, 2016 Motion of Norwegian Air UK Limited for Leave to File and Expedited Treatment at 1, 4.¹ For the reasons we have previously stated in this docket, and in Docket DOT-OST-2013-0204 involving NAUK's corporate affiliate Norwegian Air International, however, the Department should propose to deny Norwegian Air UK's application unless NAUK commits to ensure that the pilots and flight attendants who will operate its transatlantic flights will be based in the United Kingdom or the

¹ The Labor Parties plan to answer NAUK's contemporaneously filed Contingent Application for Exemption on the due date for answers to that application.

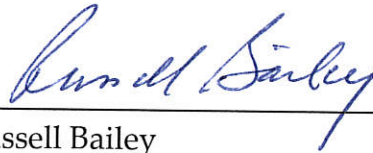
U.S. and will be employed by UK or U.S. employers on contracts governed by UK or U.S. law. As it stands, NAUK's application raises serious questions about whether its business plan is consistent with the requirements for issuance of a foreign air carrier permit set out in the aviation statutes (49 U.S.C. § 41302) and with Article 17 *bis* of the U.S.-EU Air Transport Agreement. Because of these concerns, the Labor Parties have asked DOT to seek additional information from NAUK in order to clarify the carrier's staffing plans for its services to the U.S. See Joint Answer of Labor Parties, dated Dec. 28, 2015 (Docket No. OST-2015-0261-0002) and Joint Answer of Labor Parties, dated Jan. 4, 2016 (Docket No. OST-2015-0261-0008).

The issuance of an Order to Show Cause will allow interested persons to have an opportunity to comment on the Department's tentative findings before the Department moves to a final order in this case.

Respectfully submitted,

/s/ Edward Wytkind

Edward Wytkind, President
Transportation Trades Department,
AFL-CIO
815 – 16th Street NW
Washington, DC 20006
Phone: 202-628-9262
Email: edw@ttd.org



Russell Bailey
David Semanchik
Air Line Pilots Association
1625 Massachusetts Avenue NW
Washington, DC 20036
Phone: 202-797-4086
Email: Russell.Bailey@alpa.org
David.Semanchik@alpa.org

/s/ Philip Von Schöppenthau

Philip Von Schöppenthau,
Secretary General
European Cockpit Association
Rue du Commerce 20-22
B-1000 Brussels
Belgium
Phone: 32-2-705-3293
Email: pvs@eurocockpit.be

/s/ Sara Nelson

Sara Nelson, President
Association of Flight Attendants-CWA
501 3rd Street NW, 10th Floor
Washington, DC 20001
Phone: 202-434-0574
Email: snelson@afacwa.org

/s/ Sito Pantoja

Sito Pantoja, General Vice President
International Association of Machinists
and Aerospace Workers
9000 Machinists Place
Upper Marlboro, MD 20772
Phone: 301-967-4596
Email: spantoja@iamaw.org

/s/ Alex Garcia

Alex Garcia, Secretary-Treasurer and
Air Transport Division Director
Transport Workers Union of America
AFL-CIO
501 3rd St. NW - 9th Floor
Washington, DC 20001
Phone: 202.719.3870
Email: agarcia@twu.org

Dated: January 3, 2017

CERTIFICATE OF SERVICE

I certify that on this 3rd day of January, 2017, I have caused to be served the foregoing Answer of Labor Parties to Norwegian Air UK Limited's Request for Expedited Processing by electronic mail to the addresses identified below:

romanow@pillsburylaw.com
steve.morrissey@united.com
dan.weiss@united.com
chris.walker@delta.com
robert.wirick@aa.com
howard.kass@aa.com
rpommer@atlasair.com
anita.mosner@hklaw.com
jennifer.nowak@hklaw.com
nssparks@fedex.com
cefelts@fedex.com
john.allen@faa.gov
englets@state.gov
brownpa@state.gov
gareth.alston@fco.gov.uk
david.batchelor@sesarju.eu
mark.bosely@dft.gsi.gov.uk
henrik.hololei@ec.europa.eu
deniz.bayraktutar@ec.europa.eu
vegard.einan@parat.com
efisaacson@jamhoff.com
dberg@airlines.org
oherrnstadt@iamaw.org
sschembs@afanet.org
bdanaher@twu.org



Russell Bailey