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ATTORNEYS FOR THE INTERNATIONAL AIR TRANSPORT ASSOCIATION

IN THE UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF INDIANA
INDIANAPOLIS DIVISION

In re:	§	Chapter 11
	§	
ATA AIRLINES, INC.	§	Case No. 08-03675-BHL-11
	§	
Debtor.	§	

RESPONSE OF THE INTERNATIONAL AIR TRANSPORT ASSOCIATION TO DEBTOR'S OBJECTION TO PROOF CLAIM NUMBERS 4278 AND 4279

The International Air Transport Association ("IATA"), through its counsel Fulbright & Jaworski L.L.P., files this response to the Debtor's Objection to Proof of Claims 4278 and 4279 Filed by the International Air Transport Association (the "Objection") and in support of the response, states the following:

1. The Objection seeks to reclassify Proofs of Claim 4278 and 4279, timely filed by IATA, as general unsecured nonpriority claims. Moreover, the Objection also "reserves the right to object to allowance of the Claims" and to file additional objections.

2. The Objection is not valid because:

(a) Claim 4279 represents a pre-petition gross claim of IATA against Debtor for charges of the IATA Clearing House (a division of the International Air Transport Association)

in the amount of $10,498.77 for membership, interline passenger, cargo and miscellaneous claims. It is fully-secured by a credit in the amount of $21,438.00 arising under the inter-clearing house agreement with the Airlines Clearing House, Inc. The balance of that credit ($10,939.23) secures Claim 4278.

(b) Claim 4298 represents the pre-petition gross claims against Debtor for air traffic control charges of $148,525.32 under IATA's fees and charges collection service ("ATC E&F"). This claim is secured by the balance of the credit described above, $10,930.23.

3. Responses to Specific Allegations of the Objection by Paragraph.

3.1 IATA admits the allegations of Paragraph 1.

3.2 IATA admits the allegations of Paragraph 2.

3.3 IATA admits the allegations of Paragraph 3.

3.4 IATA admits the allegations of Paragraph 4.

3.5 IATA admits the allegations of Paragraph 5.

3.6 IATA denies the allegations of Paragraph 6.

3.7 IATA denies the allegations of Paragraph 7.

3.8 IATA denies the allegations of Paragraph 8.

3.9 IATA denies the allegations of Paragraph 9.

3.10. IATA admits the allegations of Paragraph 10.

3.11 IATA denies the allegations of Paragraph 11.

PREMISES CONSIDERED IATA respectfully requests that the Court enter an order denying the Objection (including denying Debtor any right to file additional objections to the subject claims), allowing Claim 4279 as a secured claim and allowing Claim 4278 as secured

claim to the extent of its security and as an unsecured claim for the balance, and granting such other and further relief as may be just and proper.

Dated: April 2, 2009

FULBRIGHT & JAWORSKI L.L.P.

By: /s/Toby L. Gerber

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Attorneys for the International Air Transport Association

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing has been served upon the counsel and parties of record listed on the attached Service List, electronically through the Clerk's ECF system on April 2nd, 2009 or by first class United States mail, postage prepaid, on April 3rd, 2009.

/s/ Toby L. Gerber
Toby L. Gerber