

# Exhibit D

**BEFORE  
GEORGE NICOLAU  
MED-ARBITRATOR UNDER THE MERGER POLICY  
OF THE AIR LINE PILOTS ASSOCIATION, INT'L**

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	<b>X</b>
In the matter of the seniority	:
integration between	:
	:
<b>THE PILOTS OF US AIRWAYS AND</b>	:
	:
<b>THE PILOTS OF AMERICA WEST</b>	:
	<b>X</b>

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**GROUND RULES FOR THE US AIRWAYS-AMERICA  
WEST PILOT SENIORITY INTEGRATION ARBITRATION**

The following procedures shall govern the seniority integration arbitration of the US Airways Pilot Merger Representatives and the America West Pilot Merger Representatives pursuant to ALPA Merger Policy. The parties to this arbitration are the US Airways Pilot Merger Representatives and the America West Pilot Merger Representatives.

**I. Pilot Neutral Designations**

The US Airways Pilot Merger Representatives and the America West Pilot Merger Representatives shall exchange designations of their respective Pilot Neutrals on Nov. 17, 2006.

**II. Location and Schedule of Hearings**

Mediation sessions shall be held Oct. 16-20, 2006. Arbitration hearings are scheduled for Dec. 4-6, 2006, and the week of Dec. 11, 2006. Further hearings shall be held on Jan. 8-12, 15-17, 22-26, 2007. The hearings shall be held in Washington, D.C., or surrounding environs.

III. Open Hearings

Subject to the limitations of the hearing facilities, the hearings shall be open to US Airways and America West pilots and their families.

IV. Prehearing Statements of Arbitration Position

The parties' prehearing statements setting out their proposed method of seniority integration shall be exchanged and in the hands of opposing counsel and the Board of Arbitration on November 28, 2006.

V. Confidentiality

The parties hereto agree that no statements made by any Merger Representative during negotiations nor any document exchanged during negotiations (except to the extent such documents are available from other sources) nor any seniority integration proposals made by either party or any other person between May 19, 2005, and December 4, 2006, nor any statements made in discussing or commenting on such proposals, may be disclosed to the Arbitrator or offered as evidence in the Arbitration.

VI. Order of Presentation

The US Airways Pilot Merger Representatives shall present their direct case, followed by the America West Pilot Merger Representatives. The order of the rebuttal cases shall be the same. Rebuttal shall be limited to evidence directly challenging evidence adduced by an opponent during its direct case unless otherwise permitted by the Chairman.

VII. Distribution of Arbitral Precedent

Either party may distribute copies of seniority arbitration decisions or negotiated seniority integration agreements to the Board of Arbitration, with copies to the other party's counsel, prior to the commencement of the hearings. These decisions and agreements may be referred to during the course of the arbitration without being received in evidence. Any party may give the Board of Arbitration additional precedents, with copies to the other side, at any time up to the final submission of the matter for determination by the Board of Arbitration.

VIII. Witnesses

All witnesses shall be sworn.

IX. Disclosure of Witnesses

Advance disclosure of expert and other witnesses will be done 9:30 a.m., Eastern Standard Time, on the day prior to the expected day of the witness's testimony. This disclosure requirement will apply to cases in chief and also to rebuttal cases to the extent possible. Any expert witness must prepare written materials containing the substance of the expert's testimony, which shall be provided to opposing counsel simultaneously with the advance disclosure notice.

X. Joint Exhibits and Stipulations

The following exhibits, which have been submitted to the Chairman of the Board of Arbitration, shall be considered Joint Exhibits and shall also be submitted to the Pilot Neutrals prior to the commencement of the arbitration:

1. ALPA Merger Policies Booklet (August 2005 edition).
2. A. and B. Certified Lists of AAA & AWA pilot groups.
3. Stipulation dated October 4, 2005, agreeing not to collect or use personal leave of absence data.
4. A. and B. US Airways and America West Airlines Collective Bargaining Agreements.
5. TRANSITION AGREEMENT dated September 23, 2005.
6. B757 LOA
7. EMB 190 Award
8. Business Casual Dress
9. Constructive Notice Date is May 19, 2005

XI. Exhibits

Except for individual documents or exhibits used in cross-examination, all exhibits shall be tabbed and bound, with a table of contents provided for each set of exhibits.

Three copies of each exhibit shall be supplied to the Board of Arbitration. Three copies of each exhibit (identical in all respects to the copies furnished to the Board of Arbitration) shall be supplied to the other party simultaneously with their submission to the Board of Arbitration.

Copies of Company documents, pilot group documents, ALPA documents or public documents such as newspaper or trade press articles shall be admissible without authentication unless the opposing party asserts in good faith, based on articulated and demonstrable facts, that the document is not authentic.

XII. Record of the Arbitration

A court reporter shall attend all hearings and make a written transcript of the proceedings. Copies of the transcript shall be provided to the Board of Arbitration and both parties.

XIII. Post-Hearing Briefs or Oral Summations

The issue of post-hearing briefs or oral summations shall be determined no later than the close of record testimony.

XIV. Modification of Ground Rules

These ground rules may be suspended or modified by agreement of the parties or order of the Arbitration Board.

SO ORDERED, THIS 20<sup>th</sup> DAY OF OCTOBER, 2006

  
George Nicolau