

Order 2002-9-14

Served: September 13, 2002



UNITED STATES OF AMERICA
DEPARTMENT OF TRANSPORTATION
OFFICE OF THE SECRETARY
WASHINGTON, D.C.

Issued by the Department of Transportation
on the 13th day of September, 2002

Fitness Determination of

MULTI-AERO, INC.
d/b/a AIR CHOICE ONE

as a commuter air carrier under section 49 U.S.C.
41738

Docket OST-02-12417

ORDER TO SHOW CAUSE
PROPOSING ISSUANCE OF COMMUTER AIR CARRIER AUTHORITY

Summary

By this order, we tentatively find that Multi-Aero, Inc. d/b/a Air Choice One (Multi-Aero) is a citizen of the United States and is fit, willing, and able to conduct scheduled passenger operations as a commuter air carrier, subject to conditions.

Background

Section 41738 of Title 49 of the United States Code (“the Statute”) and section 298.21(d) of the Department’s Aviation Economic Regulations direct us to determine whether companies proposing to provide scheduled passenger service as commuter air carriers are “fit, willing, and able to perform the service,” and to ensure that all operations relating to this service conform to the safety standards established by the Federal Aviation Administration (FAA). In making fitness findings, the Department uses a three-part test that reconciles the Airline Deregulation Act’s liberal entry policy with Congress’ concern for operational safety and consumer protection. The three areas of inquiry that must be addressed in order to determine a carrier’s fitness are whether the applicant: (1) will have the managerial skills and technical ability to conduct the proposed operations, (2) has sufficient financial resources to commence the operations proposed without posing an undue risk to consumers or their funds, and (3) will comply with the Statute and regulations imposed by federal and state agencies. We must also determine that the applicant is a U.S. citizen.

On May 30, 2002, Multi-Aero filed an application in Docket OST-02-12417 for authority to provide scheduled passenger operations as a commuter air carrier pursuant to section 41738 of the Statute. Multi-Aero accompanied its application with the fitness information required by section 204.3 of

our regulations¹ and a motion requesting confidential treatment of certain financial information contained in its application.

No answers were filed to the application and no other issues regarding the applicant have come to our attention. Under these circumstances, we propose to decide the issue of the applicant's fitness on the basis of the written record. Upon review of the information in the application and the safety and compliance information on the carrier received from the FAA, we tentatively conclude that Multi-Aero is a U.S. citizen and has met the fitness test to conduct commuter operations. We will, however, give interested parties an opportunity to show cause why we should not adopt as final our tentative determination that Multi-Aero is fit, willing, and able to provide commuter service.

The Company

Multi-Aero, based at MidAmerica Airport in Mascoutah, Illinois, was incorporated in 1979 under the laws of the State of Missouri as a helicopter sightseeing and crop dusting venture by three individuals, one of whom was Henry Storz, the carrier's current General Manager and Director of Operations. In 1983, the other individuals sold their stock to Mr. Storz and his wife, Darlene Storz, who serves as Multi-Aero's President. In 1987, Mr. Storz transferred his interest in the company to Mrs. Storz, as trustee for the Darlene Storz Living Trust.² She currently holds 100 percent of the issued and outstanding stock.

In June 1985, Multi-Aero began an aircraft rental business in Festus, Missouri. In 1986, it was granted an FAA Air Carrier Certificate and began providing charter passenger service between Festus and Chicago-Midway using a 5-passenger Beechcraft Baron 58 aircraft. In March 2002, it moved its charter operations from Festus to MidAmerica Airport. The carrier currently operates five other aircraft: two five-seat Beechcraft Barons, one all-cargo-configured Queen Air B80, one all-cargo-configured Cessna 402B and one all-cargo-configured Cessna 208B. If granted commuter authorization, Multi-Aero will continue to serve the same airports, but will increase the number of flights from four per week to as many as two every weekday using a 9-seat King Air 200. In addition to its charter service, the carrier has a full maintenance facility and offers flight training and cargo flights, including flights under contract with United Parcel Service.

FITNESS

Managerial Competence

Darlene Storz, the carrier's sole owner, serves as Multi-Aero's President and is a member of the Board of Directors.³ She has been with Multi-Aero since 1986 and oversees administrative matters and implements Board decisions. She was employed previously by non-aviation entities including nine years with Browning Arms, a manufacturer and retailer of products used by the outdoor recreation industry.

¹ Multi-Aero filed information supplementing its application on June 24 and 26, July 3 and 29.

² Mrs. Storz is the sole Trustee with an absolute power to revoke or modify the trust at any time.

³ The Chairman of the Board is Mr. Henry Storz. Other members of the board include Darnea Wood, Ivan Storz, and Tad Wood.

Henry Storz serves as General Manager and Director of Operations. He received his aviation training at Flight Safety International and Simcom Training Center. Mr. Storz's aviation career began in January 1972 at Festus Flying Service where he worked for six years and held the positions of General Manager and President. From April 1979 until October 1986, he served as a corporate pilot for Goodwin Brothers Contractors. During this employment, he and two partners formed Multi-Aero. He holds an FAA-issued Airframe and Powerplant Mechanic certificate and has logged over 17,000 flight hours.

Ivan Storz joined Multi-Aero in April 1989 and currently serves as Chief Pilot. Prior to joining Multi-Aero, he served for ten years as Logistics Assistant to the Vice President of Goodwin Brothers Contractors (April 1979 to April 1989). During that time, he took a leave of absence (1981-1986) to complete a professional pilot training program at Flight Safety International. He holds an FAA-issued Airline Transport Pilot license and has logged over 10,000 flight hours

Tad Wood is Multi-Aero's Director of Maintenance. He began his aviation career at Multi-Aero in 1985 working in the Line Service Department (1985-1991). He served for four years as a floor mechanic (1991-1995), and in September 1995, he became the carrier's Director of Maintenance. He holds an FAA-issued Airframe and Powerplant Mechanic certificate with inspection authorization.

Gregory Golden has served as Multi-Aero's Vice President of Sales and Marketing since January 2002. He graduated from St. Louis University in 1989 with a degree in Communications. Mr. Golden's previous employment includes management positions with Southwestern Bell, Jefferson Wells, and Bank of America.

In view of the experience and background of the applicant's key personnel, and the fact that they are currently conducting operations similar to those proposed, we tentatively conclude that Multi-Aero has demonstrated that it has the management skills and technical ability to conduct its proposed limited scheduled service operations.⁴

Financial Condition and Operating Proposal

If granted the commuter authority it seeks, Multi-Aero proposes to provide scheduled service consisting of two round trip flights per day, Monday-Friday, between MidAmerica Airport outside of St. Louis and Midway Airport in Chicago using a leased nine-seat King Air 200 aircraft. When not providing scheduled service, Multi-Aero will use the King Air in its charter operations.

Multi-Aero submitted income statements for the fiscal years ended June 30, 1999, 2000, and 2001, and for the nine months ended March 31, 2002. These statements reflect a net loss of \$160,041 in 2000 and net profits of \$89,607 (1999), \$50,889 (2001), and \$70,811 (2002), for an overall net

⁴ Before authorizing a carrier to conduct air transportation operations, the FAA also evaluates certain of the carrier's key personnel with respect to the minimum qualifications for those positions as prescribed in the Federal Aviation Regulations. The FAA's evaluation of these key personnel provides an added practical and in-person test of their skills and technical ability. The FAA has advised us that the carrier's key technical personnel are acceptable to it.

profit of \$51,266. The carrier also provided a balance sheet as of March 31, 2002, that reflected working capital of \$1.35 million, total assets of \$2.4 million and total equity of \$209,065.

Multi-Aero has provided forecasts of its pre-operating costs and its first-year revenues and expenses for the proposed commuter operations. As indicated above, Multi-Aero will continue to serve the MidAmerica-Midway market, but will acquire a nine-seat King Air 200 and increase the number of flights from four per week to as many as two every weekday.

Multi-Aero states that all necessary infrastructure is in place, including operations and management personnel, pilots, and maintenance facilities. Thus, start-up expenses will be minimal (only about \$25,000) and primarily limited to advertising, legal fees, aircraft lease deposits, and costs of adding the King Air to its FAA certificate.

Multi-Aero projects first-year total operating expenses of \$1.01 million based on a total of 87 hours of scheduled service per month. The carrier's estimates have been derived from information compiled by its management team using data from its current air taxi operations with assistance from Conklin & deDecker Associates, a general aviation consulting firm. We have reviewed Multi-Aero's expense forecasts and find that they appear to be reasonable. Therefore, based on our analysis of its forecast, it appears that Multi-Aero will need \$279,137 to meet the Department's financial fitness criteria for its proposed commuter operations.⁵

Multi-Aero has been in business for over 16 years and appears to be financially stable. As of March 31, 2002, the carrier had in excess of \$1.3 million in working capital. Included in this amount was \$100,000 in cash, \$600,000 in accounts receivable and used aircraft and parts inventory of \$980,000, which Multi-Aero indicates could be liquidated in less than 30 days.

Thus, it appears that Multi-Aero has funds from its internal resources to meet the Department's fitness criteria. Therefore, we tentatively conclude that Multi-Aero will have access to resources sufficient to allow it to commence the proposed commuter operations without posing an undue risk to consumers or their funds. However, prior to making the carrier's commuter authority effective, we will require that the company provide us with updated financial information that demonstrates that Multi-Aero continues to have sufficient funds available to meet our financial fitness criteria.

Compliance Disposition

The applicant states that there are no actions or outstanding judgments against it, its owners, or its key personnel, nor have any charges of unfair, deceptive or anti-competitive business practices, or of fraud, felony or antitrust violations been brought against any of these parties in the past ten years. It further states that there have been no formal complaints filed in the past five years or orders issued in the past ten years finding Multi-Aero, its key personnel, or persons having a substantial interest in it to be in violation of the Statute or of the Federal Aviation Regulations.

⁵ To meet the Department's financial fitness criteria, an applicant should have access to financial resources sufficient to cover its pre-operating expenses (\$25,000) and the expenses that are reasonably projected to be incurred during three months of operations (\$254,137). In calculating available resources, projected revenues may not be used.

Multi-Aero reported that one of its aircraft was involved in an accident on October 23, 2001, in which the pilot was killed and the aircraft destroyed. The FAA indicates that no enforcement actions have been taken against the carrier as a result. Multi-Aero also reported that on July 23, 2002, a Cessna 402B that it owned was damaged while landing at St. Louis International Airport. Although the FAA states that the accident investigation has been closed, it is continuing to investigate the pilot of the aircraft, who may not have been qualified to operate as required by FAR 135, and the record keeping practices of the carrier with respect to pilot training and qualifications. Should the investigation result in certificate action against the carrier, we can re-evaluate whether the carrier remains fit to conduct operations as a commuter air carrier.

Moreover, the FAA reports that Multi-Aero has a good working relationship with that agency and states that it does not know of any reason why we should not find Multi-Aero fit to conduct scheduled passenger service.

Based on the above, we tentatively conclude that Multi-Aero has the proper regard for the laws and regulations governing its services to ensure that its aircraft and operations will conform to applicable safety standards and that acceptable consumer relations practices will be followed.

CITIZENSHIP

49 U.S.C. 41102 requires that authority to engage in air transportation be held only by citizens of the United States as defined in 49 U.S.C. 40102(a)(15). That section requires that the president and two-thirds of the Board of Directors and other managing officers be U.S. citizens and that at least 75 percent of the outstanding voting stock be owned by U.S. citizens. We have also interpreted the Statute to mean that, as a factual matter, the carrier must actually be controlled by U.S. citizens.

As noted earlier, all of Multi-Aero's issued stock is held by Ms. Darlene Storz, who is a citizen of the United States. Further, all of the management team and key personnel are U.S. citizens. Moreover, Multi-Aero has provided an affidavit attesting that it is a citizen of the United States within the meaning of the Statute and that it is actually controlled by U.S. citizens. Our review of the applicant has uncovered no reason to suggest that control of Multi-Aero rests with non-U.S. citizens.

Based on the above, we tentatively conclude that Multi-Aero is a citizen of the United States and is fit, willing, and able to provide the limited scheduled passenger service it proposes as a commuter air carrier.

OBJECTIONS

We will give interested persons 14 days following the service date of this order to show cause why the tentative findings and conclusions set forth here should not be made final; answers to objections will be due within 7 days thereafter. We expect that persons objecting to our tentative findings and conclusions will support their objections with relevant and material facts. We will not entertain general, vague, or unsupported objections. If no substantive objections are filed, we will issue an

order that will make final our tentative findings and conclusions with respect to Multi-Aero's fitness and commuter authority.

EFFECTIVE COMMUTER AUTHORIZATION CONDITIONS AND LIMITATIONS

In the event that we find Multi-Aero fit, willing, and able to conduct the proposed commuter service, we will issue to it a Commuter Air Carrier Authorization. However, that authorization will not become effective until the carrier has fulfilled all requirements for effectiveness as set forth in the Terms, Conditions, and Limitations attached to its authorization.⁶ Among other things, this includes our receipt of evidence that the carrier has been issued Operations Specifications by the FAA authorizing scheduled passenger service under Part 135 of the Federal Aviation Regulations, evidence of liability insurance coverage that meets the requirements of Part 205 of our rules for commuter air carriers, and evidence that Multi-Aero continues to have adequate financial resources available to it to meet our financial fitness criteria.⁷

Moreover, given the relatively limited scope of Multi-Aero's proposed operations—one market with up to two daily flights using one aircraft that can be operated under FAA Part 135—the fact that the carrier is relying on internal resources to fund its proposed commuter operations, and its recent accident history, we have decided to limit any commuter authority issued to Multi-Aero to the use of aircraft that can be operated under Part 135 (in effect, aircraft with not more than nine seats in scheduled passenger operations). Our findings regarding the adequacy of Multi-Aero's management or financial resources may not hold true if the company were to initiate operations using larger aircraft that would require certification from the FAA under Part 121. Thus, should Multi-Aero propose to conduct such operations, it must first be determined fit to do so.

Further, we remind Multi-Aero of the requirements of 49 U.S.C. 41110(e). Specifically, that section requires that, once a carrier is found fit initially, it must remain fit in order to hold its authority. To be assured that commuter air carriers continue to be fit after effective authority has been issued to them, we require that they supply information describing any subsequent substantial changes they may undergo in areas affecting fitness. In this regard, should Multi-Aero propose any substantial changes in its ownership, management, or operations, it must first comply with the

⁶ We also reserve the right to stay the effectiveness of Multi-Aero's authority if any new information becomes available to us that warrants such action.

⁷ This information should be filed in this docket and should include a revised list of Multi-Aero's pre-operating expenses, broken down between those already paid and those remaining to be paid, as well as independent verification that Multi-Aero has available funds sufficient to cover all remaining unpaid pre-operating expenses and to provide the necessary working capital reserve.

requirements of section 204.5 of our rules.⁸ The compliance of the company with this requirement is essential if we are to carry out our responsibilities under the Statute.⁹

REQUEST FOR CONFIDENTIAL TREATMENT

As indicated above, Multi-Aero filed a motion for confidential treatment of the financial information contained in Exhibits 4 and 5 of its application. The carrier filed an amendment on July 3, 2002, withdrawing its request with respect to all materials contained in Exhibits 4 and 5, except for the information contained in page 7 of Exhibit 5. Multi-Aero states that page 7 contains detailed cost information that, if disclosed, would likely cause substantial harm to its competitive position.

Rule 39 instructs us to evaluate requests for confidential treatment in accordance with the standards of disclosure found in the Freedom of Information Act (5 U.S.C. section 552). Information may be withheld from disclosure under 5 U.S.C. section 552(b)(4) if it is (1) commercial or financial, (2) obtained from a person outside of government, and (3) privileged or confidential. [*See Gulf and Western Industries, Inc. v. United States, 615 F.2d 527, 529 (D.C. Cir 1979)*]

There is no question that the information for which confidential treatment is sought is financial or commercial in nature and that it was obtained from a person outside the government. The remaining question is whether the information is privileged or confidential--whether "disclosure of the information is likely to have either of the following effects: (1) impair the Government's ability to obtain necessary information; or (2) cause substantial harm to the competitive position of the person from whom the information was obtained." [*See National Parks and Conservation Association v. Morton, 498 F.2d 765, 770 (D.C. Cir. 1974)*] Further, to be privileged or confidential, the information must not be the type that is usually released to the public. [*See Gulf and Western Industries, Inc. v. United States, 615 F.2d 527, 530 (D.C. Cir. 1979)*].

We have decided to grant Multi-Aero's request for confidential treatment of page 7 of Exhibit 5. The Department routinely requires that an applicant for certificate or commuter authority provide projected financial statements which are available for review by the public as part of the fitness proceeding. Exhibit 5, page 7 provides a detailed breakdown upon which Multi-Aero's first year projections are based, the release of which could cause competitive harm to the applicant without any countervailing public benefits for its release.

ACCORDINGLY:

⁸ The carrier may contact our Air Carrier Fitness Division to report proposed substantial changes in its operations, ownership, or management, and to determine what additional information, if any, will be required under section 204.5. Moreover, by notice dated July 21, 1998, the Department requested air carriers to provide a 30-day advance notification of any proposed change in ownership, restructuring, or recapitalization. If the carrier fails to file the information or if the information fails to demonstrate that the carrier will continue to be fit upon implementation of the substantial change, the Department may take such action as is appropriate, including enforcement action or steps to modify, suspend, or revoke the carrier's commuter authority.

⁹ We also remind Multi-Aero about the requirements of section 204.7 of our rules. This section provides, among other things, that (1) the commuter authority granted to a company shall be revoked if the company does not commence actual flying operations under that authority within one year of the date of the Department's determination of its fitness; (2) if the company commences operations for which it was found fit and subsequently ceases such operations, it may not resume scheduled passenger operations unless its fitness has been redetermined; and (3) if the company does not resume such operations within one year of its cessation, its authority shall be revoked for dormancy.

1. We direct all interested persons to show cause why we should not issue an order finding that Multi-Aero, Inc. d/b/a Air Choice One is fit, willing, and able under 49 U.S.C. 41738 to provide scheduled passenger service as a commuter air carrier using small aircraft pursuant to Part 135 of the Federal Aviation Regulations.
2. We direct any interested persons having objections to the issuance of an order making final any of the proposed findings, conclusions, or the award of authority set forth here to file them with Department of Transportation Dockets, 400 Seventh Street, SW, Room PL-401, Washington, D.C. 20590, in Docket OST-02-12417 and serve them upon all persons listed in Attachment A no later than 14 days after the service date of this order; answers to objections shall be filed no later than 7 days thereafter.
3. If timely and properly supported objections are filed, we will accord full consideration to the matters or issues raised by the objections before we take further action.¹⁰
4. In the event that no objections are filed, we will consider all further procedural steps to be waived, and we will enter an order making final our tentative findings and conclusions set out here and awarding Multi-Aero, Inc. d/b/a Air Choice One a Commuter Air Carrier Authorization, subject to the attached specimen Terms, Conditions, and Limitations.
5. We grant the request of Multi-Aero, Inc. d/b/a Air Choice One under section 302.12 to withhold from public disclosure the information contained in page 7 to Exhibit 5 of its application.
6. We will serve a copy of this order on the persons listed in Attachment A.
7. We will publish a summary of this order in the Federal Register.

By:

READ C. VAN DE WATER
Assistant Secretary for Aviation
and International Affairs

(SEAL)

*An electronic version of this document is available on the World Wide Web at
<http://dms.dot.gov>*

¹⁰ Since we have provided for the filing of objections to this order, we will not entertain petitions for reconsideration.



Specimen
Terms, Conditions, and Limitations

MULTI-AERO, INC.
d/b/a AIR CHOICE ONE

is authorized to engage in scheduled passenger air transportation operations as a commuter air carrier.

This authority is subject to the following provisions:

(1) The authority to conduct scheduled passenger operations will not become effective until six (business) days after the Department has received the following documents; provided, however, that the Department may stay the effectiveness of this authority at any time prior to that date:

(a) A copy of the holder's Air Carrier Certificate and Operations Specifications authorizing such operations from the Federal Aviation Administration (FAA).

(b) A certificate of insurance on OST Form 6410 evidencing liability insurance coverage meeting the requirements of 14 CFR 205.5(b) for all of its aircraft.

(c) A statement of any changes the holder has undergone in its ownership, key personnel, operating plans, financial posture, or compliance history, since the date of the Show Cause Order in this case.

(d) A revised list of pre-operating expenses already paid and those remaining to be paid, as well as independent verification that the holder has available to it funds sufficient to cover any remaining pre-operating expenses and to provide a working capital reserve equal to the operating costs that would be incurred in three months of operations.

(2) Pending receipt of effective authority, the holder may not accept payment of any kind (i.e., cash, check, or credit card) or issue tickets for scheduled passenger operations, and any advertisement or listing of flights by the holder must prominently state: "This service is subject to receipt of government operating authority."

(3) The holder shall at all times conduct its operations in accordance with the requirements of 14 CFR Part 298 and any other regulations prescribed by the Department of Transportation for the services authorized here, and with such other reasonable terms, conditions, and limitations as the Department of Transportation may prescribe in the public interest.

(4) The holder's authority is limited to operations conducted pursuant to Part 135 of the Federal Aviation Regulations. In the event that the holder wishes to institute operations that would require Part 121 certification from the FAA, it must first be determined fit for such operations.

(5) *The holder's authority is effective only to the extent that such operations are also authorized by the FAA, and comply with all Department of Transportation requirements concerning security.*

(6) *The holder shall at all times remain a "Citizen of the United States" as required by 49 U.S.C. 40102(a)(15).*

(7) *The holder shall maintain in effect liability insurance coverage as required under 14 CFR Part 205. Failure to maintain such insurance coverage will render this authority ineffective, and this or other failure to comply with the provisions of Subtitle VII of Title 49 of the United States Code or the Department's regulations shall be sufficient grounds to revoke this authority.*

(8) *The holder shall maintain in effect at all times with the Department of Transportation current information on OST Registration Form 4507.*

(9) *In the event that the holder receives effective scheduled passenger authority, the following additional conditions will apply:*

(a) *The holder may reduce or terminate service at any point or between any two points, subject to compliance with the provisions of 49 U.S.C. 41734 and all orders and regulations issued by the Department of Transportation under that section.*

(b) *The holder may not provide scheduled passenger air transportation to or from Dallas (Love Field), Texas, except within the limits set forth in section 29 of the International Air Transportation Competition Act of 1979, as amended by section 337 of the Department of Transportation and Related Agencies Appropriations Act, 1998.*

(10) *Should the holder propose any substantial changes in its ownership, management, or operations (as that term is defined in 14 CFR 204.2(l)), it must first comply with the requirements of 14 CFR 204.5.*

(11) *In the event that the holder does not commence actual flying operations as a commuter air carrier under this authority within one year of the date of the Department's determination of its fitness, its commuter authority shall be revoked for dormancy. Further, in the event that the holder commences but subsequently ceases all scheduled passenger operations, the authority granted here shall be suspended under the terms of 14 CFR 204.7 and the holder may neither recommence nor advertise such operations unless its fitness to do so has been redetermined by the Department. Moreover, if the holder does not resume such operations within one year of its cessation, its commuter authority shall be revoked for dormancy.*

**SERVICE LIST FOR MULTI-AERO, INC.
d/b/a AIR CHOICE ONE**

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