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Order 2003-2-8

Served: February 7, 2003



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

Issued by the Department of Transportation
on the 7th day of February, 2003

Application of

**GLENWOOD AVIATION, LLC
d/b/a AMERICA RISING**

Docket OST-02-13365 - 8

for a certificate of public convenience and necessity under
49 U.S.C. 41102 to engage in interstate scheduled air
transportation of persons, property, and mail

**ORDER TO SHOW CAUSE
PROPOSING ISSUANCE OF CERTIFICATE AUTHORITY**

Summary

By this order, we tentatively find that Glenwood Aviation, LLC d/b/a America Rising (Glenwood) is fit, willing, and able to provide interstate scheduled air transportation of persons, property, and mail as a certificated air carrier, subject to certain limitations.¹

Background

Section 41102 of Title 49 of the United States Code ("the Transportation Code") directs us to determine whether applicants for certificate authority to provide interstate scheduled air transportation of persons, property and mail are "fit, willing, and able" to perform such transportation and to comply with the Transportation Code and the regulations of the Department. 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 company's fitness are whether the applicant (1) will have the managerial skills and technical ability to conduct the proposed operations, (2) will have access to resources sufficient to commence operations without posing an undue risk to consumers, and (3) will comply with the Transportation Code and regulations imposed by Federal and State agencies. We must also find that the applicant is a U.S. citizen.

On September 13, 2002, Glenwood filed an application in Docket OST-02-13365 for a certificate to engage in scheduled interstate air transportation of persons, property, and mail using rotary-wing aircraft between New York City and Washington, DC. Glenwood

¹ Specifically, we propose to limit Glenwood's authority to the use of "small" aircraft that can be operated under its Part 135 Air Carrier Certificate issued by the Federal Aviation Administration.

accompanied its application with the fitness information required by section 204.3 of our regulations.²

No answers opposing Glenwood's application were filed and no special 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, and tentatively conclude that Glenwood is a U.S. citizen and is fit, willing, and able to operate its proposed interstate scheduled passenger service. However, we will give interested persons an opportunity to show cause why we should not adopt as final the tentative findings and conclusions stated herein.

FITNESS

The Company

Glenwood was formed as a limited liability company under the laws of the State of Delaware in October 1999. It holds an FAA-issued Part 135 Air Carrier Certificate and currently provides on-demand charter services in a number of markets in the mid-Atlantic States and the Northeast, as well as helicopter maintenance and management services from its operating base at the Tipton Airport in Fort Meade, Maryland. The carrier is 100 percent owned by Capitol Rising, LLC, a holding company that is, itself, wholly owned by Mr. Stephen T. Walker, a U.S. citizen.

If found fit, Glenwood proposes to provide scheduled downtown-to-downtown helicopter shuttle service between New York City and Washington, DC, potentially expanding to other markets in the northeast corridor. Using three leased Sikorsky S-76 helicopters, each having six passenger seats, Glenwood plans to operate six daily round-trip flights between New York City (W. 30th Street Heliport) and Washington, DC (the South Capitol Street Heliport or Ronald Reagan Washington National Airport (DCA)).³

Managerial Competence

Mr. Stephen T. Walker is Glenwood's sole owner and Chairman of the Board. He holds engineering degrees from Northeastern University and the University of Maryland and has government work experience as a Computer Scientist with the National Security Agency (May 1962-October 1974), Programs Manager with the Defense Advanced Research Projects Agency (October 1974-February 1978), and Senior Technical Advisor to the Secretary of Defense and Undersecretary for Research & Engineering (February 1978-May 1983). From May 1983 until April 1998, he was President and CEO of Trusted Information Systems, Inc., a firm specializing in research and development of communications security systems. In May 1998, he became a General Partner of Steve Walker & Associates, a venture capital

² Glenwood filed information supplementing its application on November 20. The applicant requested that certain information contained in these filings be withheld from public disclosure. By letter dated December 26, 2002, we notified the applicant of our intended ruling on its confidentiality requests. On December 31, Glenwood submitted for the public record, those exhibits for which confidential treatment was not granted.

³ The applicant states that the South Capitol Street Heliport is currently limited to government operations only. If commercial flights are not permitted at the Heliport by March 2003, Glenwood intends to commence services using DCA. If security concerns prevent Glenwood from using either airport at its start-up, the carrier will begin service at the Tipton Airport, where Glenwood is headquartered.

management company, and in September 2000, he became Chairman of the Board of Glenwood Aviation. Presently, Mr. Walker devotes approximately 20 percent of his work week to Glenwood's business.

Mr. Barry S. Lutin, an Airline Transport Pilot with over 30 years' experience in the aviation and management consulting fields, is Glenwood's President and Chief Executive Officer. Between January 1972 and October 1992, Mr. Lutin worked for Corporate Air, Inc., an air taxi operator serving the northeast US, starting as a pilot and advancing to positions in marketing and financial management. At the time he left the company, he was President and CEO. Between November 1992 and March 2002, he was employed as a financial planner and project manager by a number of aviation-industry companies including Piper Aircraft Corporation, Northern NEF, Inc., and Shuttle America.

Mr. Sanford Garner, III, an Airline Transport Pilot with over 8,000 hours of flight time, is Glenwood's Director of Operations. He began his aviation career in 1983 and, until joining Glenwood Aviation in November 2000, worked for the following companies/organizations as a pilot and flight instructor: Aero Flight LTD (November 1983-August 1984), Dover International Helicopters (August 1984-February 1985), Fugazy Air Service (February 1985-July 1986), Maryland Army National Guard (January 1987-March 1987), Keystone Helicopter Corporation (March 1987-July 1991), Air Methods Corporation (July 1991-March 1994), and Corporate Jets, Inc. (March 1994-September 1998). Between September 1998 and November 2002, when he joined Glenwood, Mr. Garner worked briefly for Associated Aircraft Group and then operated his own aviation consulting business.

Mr. Tom Gorman, an Airframe and Powerplant Mechanic, joined Glenwood as its Chief Inspector in September 2001. Prior to that, Mr. Gorman was employed as a helicopter mechanic by the following companies: Island Helicopter (July 1978-September 1981), New York Helicopter (September 1981-June 1984), Trump Air (June 1984-January 1991), Nightingale, Omniflight Helicopter A.M.S. (July 1991-June 1993), and the Maryland State Police (June 1993-September 2001).

Mr. Mark Rager, an Airframe and Powerplant Mechanic, has been Glenwood's Director of Maintenance since October 2000. Mr. Rager began his aviation career with the U.S. Marine Corps in 1981 as a helicopter repair supervisor, serving in that capacity until April 1988. Since that time he has worked as an aircraft mechanic for Montgomery Aviation (June 1989-May 1989), USJet Aviation (April 1988-May 1989), various US Army helicopter units (May 1989-April 1994), and the Maryland State Police (April 1994-October 2000).

In its application, Glenwood also provided the resumes for its proposed Chief Pilot and Director of Finance with a request that they be treated confidentially. Inasmuch as revealing their names might pose employment difficulties for these two individuals, by letter dated December 26, 2002, we granted this request. However, we have reviewed the training and work experience of both these individuals and find them to be qualified to hold their respective positions with the carrier.⁴

⁴ In doing so, however, we advised Glenwood that it will be required to file identity/resume information for these positions on the public record prior to having any authority it may receive made effective.

In view of the experience and background of the applicant's key personnel, we tentatively conclude that Glenwood has demonstrated that it has the management skills and technical ability to conduct its proposed service.⁵

Financial Plan and Operating Proposal

If granted the certificate authority it seeks, Glenwood proposes to operate three leased six-seat Sikorsky S-76 helicopters.⁶ Glenwood plans to sell six five-year leasehold interests in each of these helicopters to individuals or companies that pay a one-time purchase price as well as a monthly management fee covering fixed costs and each leasehold owners' pro rata share of the direct operating costs. In exchange, each leasehold owner will be entitled to one seat on two daily round-trip shuttle flights.

Glenwood initially plans to operate six round-trip flights each weekday, between New York and Washington.⁷ These services will be provided to corporations and individuals on the share/seat-capacity basis described above. In 2004, the carrier expects to transition its scheduled operations to Sikorsky S-92 aircraft configured with eighteen passenger seats. The shares of the then-current S-76 customers will be transferred to the first new S-92 aircraft, and additional aircraft will be added as additional leasehold interests are sold.

Glenwood estimates that its first year operating expenses will total approximately \$9,979,074 and that it will incur \$296,676 in additional pre-operating expenses. Therefore, based on the information before us, Glenwood will need approximately \$2.8 million in funds to meet our financial fitness criteria.⁸

Mr. Steve Walker has stated that he intends to use cash contained in his personal and business accounts to cover Glenwood's start-up and first-year costs to the extent needed. As of November 13, funds contained in Mr. Walker's accounts held at Bank of America totaled

⁵ Before authorizing a carrier to conduct air transportation operations, the FAA also evaluates certain of the applicant'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 the skills and technical ability of these individuals. The FAA has advised us that all of the individuals holding key technical positions with Glenwood are qualified and have been approved for those positions.

⁶ Glenwood's parent company, Capital Rising, will lease these aircraft from Sikorsky Aircraft Corporation and, in turn, will sublease them to Glenwood commencing one month prior to the start of Glenwood's operations.

⁷ Glenwood expects to continue to operate its three existing helicopters on an on-demand basis under Part 298 after commencement of its scheduled operations.

⁸ To meet the Department's financial fitness criteria, an applicant should have access to financial resources sufficient to cover its pre-operating expenses and the expenses that are reasonably projected to be incurred during three months of "normal" operations. Because projected expenses during the first several months of air transportation services frequently do not include all costs that will be incurred during a "normal" period of operations, it is our practice to base our three-month test on one-quarter of the first year's operating cost forecast, which, in this case, is approximately \$2.5 million. Further, in calculating available resources, projected revenues may not be used.

\$2.6 million.⁹ Glenwood appears to be in sound financial condition. The carrier's balance sheet as of October 31, 2002 shows total current assets of \$225,302 and total current liabilities of \$30,113 resulting in a positive working capital position of \$195,189 and a current assets to current liabilities ratio of 7.5:1. These funds, as well as those contributed by Mr. Walker, will be available to support the company's proposed scheduled passenger operations, giving the company \$2.8 million in available funds. Moreover, while we do not normally include projected revenues in calculating available resources, in this case, we note that Glenwood's operating plan contemplates the "pre-sale" of seats on its flights through contracts that would cover its operating expenses. Absent such contracts and their guaranteed revenues, it is not clear that Glenwood would commence or conduct its proposed shuttle service.

In light of the above, we tentatively conclude that Glenwood will have sufficient financial resources to enable it to commence its proposed scheduled passenger operations without posing an undue risk to consumers or their funds.

Compliance Disposition

Glenwood states that there are no actions or outstanding judgments against it, its owner, or its key personnel, nor have there been any charges of unfair, deceptive or anti-competitive business practices, or of fraud, felony or antitrust violations brought against any of these parties in the past ten years. The applicant also states that there are no pending investigations, enforcement actions, or formal complaints filed by the Department against it, its key personnel, or persons having a substantial interest in it with respect to compliance with the Transportation Code or the Department's regulations.

According to the FAA, Glenwood's current management team is composed of individuals who possess the skills necessary to carry out the company's business plan in a manner that meets federal safety requirements. The agency has further advised us that it knows of no reason why the carrier should not be granted the authority it is seeking.

Under these circumstances, we tentatively conclude that Glenwood has the proper regard for the laws and regulations governing its services to ensure that its aircraft and personnel conform to applicable safety standards and that acceptable consumer relations practices will be followed.

CITIZENSHIP

Section 41102 of the Transportation Code requires that certificates 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

⁹ The availability of these funds is clearly confirmed in the applicant's submission describing Mr. Walker's net worth, for which we granted a request for confidential treatment.

Transportation Code to mean that, as a factual matter, the carrier must actually be controlled by U.S. citizens.

As stated earlier, Mr. Stephen T. Walker, a U.S. citizen, wholly owns Glenwood through Capital Rising, LLC and serves as its Chairman of the Board. Together with Mr. Walker, Mr. Barry Lutin and Mr. Gerald Hunter, both of whom are also U.S. citizens, comprise Glenwood's entire Board. As noted previously, Mr. Lutin is Glenwood's President and CEO. Mr. Hunter is a retired partner in the international accounting and consulting firm of KPMG Peat Marwick LLP, who served with that company in various capacities over a period of nearly 30 years. In addition, all of Glenwood's key personnel are U.S. citizens and the company has provided an affidavit attesting that it is a citizen of the United States within the meaning of the Transportation Code. Finally, our review of the applicant's citizenship has uncovered no reason to suggest that control of Glenwood rests with non-U.S. citizens.

Based on the above, we tentatively conclude that Glenwood is a citizen of the United States and is fit, willing, and able to conduct the interstate scheduled passenger operations proposed in its applications.

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 such persons to direct their objections, if any, to the application and points at issue and to support such objections with detailed economic analyses. If an oral evidentiary hearing or discovery procedures are requested, the objector should state in detail why such a hearing or discovery is considered necessary, and what material issues of decisional fact the objector would expect to establish through a hearing or discovery that cannot be established in written pleadings. The objector should consider whether discovery procedures alone would be sufficient to resolve material issues of decisional fact. If so, the type of procedure should be specified (*See* Part 302, Rules 19 and 20); if not, the reasons why not should be explained. 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 Glenwood's fitness and certification.

CERTIFICATE CONDITIONS AND LIMITATIONS

If Glenwood is found fit and issued the certificate it seeks, its authority will not become effective until the company has fulfilled all requirements for effectiveness as set forth in the terms and conditions attached to its certificate. Among other things, this includes our receipt of evidence that Glenwood has been certified by the FAA to engage in the subject operations, a fully executed OST Form 6410 evidencing liability insurance coverage that meets the requirements of section 205.5(b) of our rules, and a statement of any changes it may have undergone since its fitness was examined.¹⁰

¹⁰ Glenwood submitted its Aviation Accident Family Assistance Plan with the Department (in Docket OST-96-1960) and with the National Transportation Safety Board on October 16.

We also wish to remind the company 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 certificated 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.

Our tentative findings stated above are based on the operating plan described in Glenwood's application, namely, utilizing up to three six-seat Sikorsky S-76 aircraft under Part 135. Were the applicant to propose to expand its operations to include aircraft for which an FAA-issued Part 121 Air Carrier Certificate was required, our fitness findings might no longer apply. Therefore, we propose to limit any authority issued to Glenwood to operations with aircraft that can be operated under an FAA-issued Part 135 Air Carrier Certificate. Should Glenwood subsequently desire to acquire and operate larger aircraft, it must first be determined fit for such operations.¹¹

In addition, should Glenwood propose other substantial changes in its ownership, management, or operations, it must first comply with the requirements of section 204.5 of our rules.¹² The compliance of the company with this requirement is essential if we are to carry out our responsibilities under the Transportation Code.¹³

Finally, to aid the Department in monitoring the fitness of new carriers, we ask all newly certificated carriers to submit a detailed progress report, within 45 days following the end of the first year of certificated operations, to the Air Carrier Fitness Division. The report should include a description of the carrier's current operations (number and type of aircraft, principal markets served, total number of full-time and part-time employees), a summary of how these operations have changed during the year, a discussion of any changes it anticipates from its current operations during its second year, current financial statements,¹⁴ and a listing of current senior management and key technical personnel. The carrier should

¹¹ While we note that Glenwood has advised us that it intends to operate larger rotary wing aircraft beginning in 2004, doing so would require that the company obtain Part 121 authority from the FAA and an amendment to the scheduled passenger certificate at issue here.

¹² 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. If the carrier fails to file this updated 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 certificate authority.

¹³ We also remind Glenwood about the requirements of section 204.7 of our rules. This section provides, among other things, that (1) the certificate 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 certificated operations unless its fitness has been redetermined; and (3) if the company does not resume operations within one year of its cessation, its authority shall be revoked for dormancy.

¹⁴ These financial statements should include a balance sheet as of the end of the company's first full year of actual flight operations and a twelve-month income statement ending that same date.

also be prepared to meet with staff members of the Fitness Division to discuss its current and future operations.

ACCORDINGLY:

1. We direct all interested persons to show cause why we should not issue an order making final the tentative findings and conclusions stated above and award a certificate to Glenwood Aviation, LLC, d/b/a America Rising authorizing it to engage in interstate scheduled air transportation of persons, property, and mail, subject to the attached specimen Terms, Conditions, and Limitations.
2. We direct any interested persons having objections to the issuance of an order making final any of the proposed findings, conclusions, or the certificate award set forth here to file them with Department of Transportation Dockets, 400 Seventh Street, SW, PL-401, Washington, D.C. 20590, in Docket OST-02-13365, 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.¹⁵
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.
5. We will serve a copy of this order on the persons listed in Attachment A.
6. 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>*

¹⁵ Since we have provided for the filing of objections to this order, we will not entertain petitions for reconsideration.



SPECIMEN

Terms, Conditions, and Limitations

GLENWOOD AVIATION, LLC d/b/a AMERICA RISING

is authorized to engage in interstate air transportation of persons, property, and mail between any point in any State, territory, or possession of the United States or the District of Columbia, and any other point in any of those entities.

This authority is subject to the following provisions:

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

(4) The holder shall at all times conduct its operations in accordance with the regulations prescribed by the Department of Transportation for the services authorized by this certificate, and with such other reasonable terms, conditions, and limitations as the Department of Transportation may prescribe in the public interest.

- (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 a certificate 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 certificate.*
- (8) *The holder is authorized to conduct charter flights in interstate and/or foreign air transportation in accordance with the provisions of 14 CFR 212.*
- (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 under this certificate within one year of the date of the Department's determination of its fitness, its authority shall be revoked for dormancy, unless the holder is conducting operations under another type of certificate authority. Further, in the event that the holder commences operations for which it was found "fit, willing, and able" and subsequently ceases all such operations, its authority under all certificates held 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 operations within one year of its cessation, its authority shall be revoked for dormancy.*

ATTACHMENT A

SERVICE LIST FOR GLENWOOD AVIATION, LLC

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