

Order 2003-5-16  
Served: May 14, 2003



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

Issued by the Department of Transportation  
on the 13<sup>th</sup> day of May, 2003

Application of

**VALLEY AIR EXPRESS, INC.**

**Docket OST-02-13159**

for authority to engage in scheduled  
passenger operations as a commuter air  
carrier under 49 U.S.C. 41738

**ORDER TO SHOW CAUSE  
PROPOSING ISSUANCE OF COMMUTER AIR CARRIER AUTHORITY**

**Summary**

By this order, we tentatively find that Valley Air Express, Inc. (Valley Air) 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 certain limitations.

**Background**

Section 41738 of Title 49 of the United States Code (“the Transportation Code”) 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) will have sufficient financial resources to commence the operations proposed without posing an undue risk to consumers or their funds, and (3) will comply with the Transportation Code and regulations imposed by federal and state agencies. We must also determine that the applicant is a U.S. citizen.

On August 16, 2002, Valley Air filed an application in Docket OST-02-13159 for authority to provide scheduled passenger operations as a commuter air carrier pursuant to section 41738 of

the Transportation Code. Valley Air accompanied its application with the fitness information required by section 204.3 of our regulations.<sup>1</sup>

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 Valley Air 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 Valley Air is fit, willing, and able to provide commuter service.

## FITNESS

### The Company

Mountain States Aviation, LLC, was organized on August 9, 2000, as a California limited liability corporation. Its name was changed to SunAir Express, LLC (SunAir) on September 7, 2000. SunAir LLC was found fit and issued effective authority as a commuter air carrier by Order 2001-5-6, dated May 8, 2001. SunAir operated as a commuter until on or about September 29, 2001, when it ceased its scheduled passenger operations. As a result of the cessation, under the provisions of section 204.7 of our rules (14 CFR 204.7), SunAir's commuter authority was suspended.

On February 1, 2002, Mr. William J. Delgado formed Valley Air Express Holdings, Inc. (Valley Holdings), a California corporation. On February 6, 2002, Valley Holdings purchased 100 percent of SunAir's issued and outstanding stock, becoming its sole shareholder. Valley Holdings has no employees and is used strictly as a holding company. Mr. Delgado owns 100 percent of Valley Holdings. On April 5, 2002, SunAir changed its name to Valley Air Express, Inc.

On August 16, 2002, Valley Air filed an application in this docket for a redetermination of its fitness in order to resume scheduled passenger operations under SunAir's commuter authority. At the time of the application, Valley Air indicated that it was operating on-demand charters under its Part 298 air taxi authority, and that, if it was found fit to do so, it intended to operate six daily scheduled passenger flights between Santa Rosa and Oakland, California, beginning September 16, 2002.

On September 3, 2002, Valley Air submitted a letter relinquishing both its suspended commuter authority and its air taxi authority so that it could conduct its proposed scheduled operations immediately as an *intrastate* carrier while it continued to pursue its application for a fitness determination in order to receive new commuter authority as an *interstate* carrier.<sup>2</sup> As a result, by Order 2002-9-7, issued September 10, 2002, we revoked its commuter and air taxi authority.

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<sup>1</sup> Valley Air filed information supplementing its application on December 9, 2002, and April 8, 2003.

<sup>2</sup> In the course of reviewing the application, we advised Valley Air that it was unlikely that we could complete our review of its fitness to resume operations by its proposed September 16 start-up date, particularly since we would need additional information from the carrier in support of its application. Valley Air asked whether it could conduct its proposed operations as an *intrastate* carrier without receiving the Department's economic authority, since its flights would be operated solely within the State of California. We advised it that, in order to do so, it would have to

Valley Air is based in Sacramento and currently provides scheduled service of five weekly round trips between Victorville and Long Beach, California, using a nine-seat Cessna 208B Grand Caravan as an intrastate carrier.<sup>3</sup> If it is found fit to provide interstate scheduled passenger service as a commuter air carrier, it proposes initially to operate two round trip flights each weekday between Victorville and Long Beach and one round trip flight daily between Victorville and Las Vegas.

### **Managerial Competence**

Mr. William J. Delgado, Valley Air's owner, serves as its Chief Executive Officer, President and Secretary. He was employed by Pacific Bell from October 1977 until November 1991, serving as a Field Technician, Engineer and Financial Analyst. In 1989, he graduated from the University of San Francisco with a Bachelor of Science Degree in Applied Economics. In November 1991, he formed All Star Telecom, Inc., as a sole proprietorship. He sold the company in 2001, but remained as President until March 2002. As noted above, in February 2002, he formed Valley Holdings which is now Valley Air's sole shareholder.

Mr. Cory T. Robin joined Valley Air in December 2002 as its Executive Vice President/Chief Operations Officer. Mr. Robin received a Bachelor of Science degree in Business Administration from the University of Utah. Since 1993, Mr. Robin has served in sales and marketing management positions. In 1998, he founded SkyVantage and serves as its President and Chief Executive Officer. SkyVantage provides a range of consulting services to airlines including reservations systems, revenue management and business plan development. Mr. Robin indicates that any time spent with SkyVantage is in an ownership, rather than management, position and that the majority of his time will be spent with Valley Air.

Ms. Karen J. Casey has served as Valley Air's Director of Operations since April 2, 2002. She attended Green River Community College where she studied Air Traffic Control and Aviation. Ms. Casey began her aviation career in February 1988 as a Corporate Pilot with Interstate Distributors. Since that time she has served in positions as a pilot with United Express (October 1989-January 1992), Pegasus Air (January 1993-December 1996), IASCO (August 1996-December 1997), Golden Eagle AirMed (May 1998-August 1999), Rocky Mountain Holdings (May 1999-April 2000) and Sun Air Express, LLC (August 2000-September 2001). She was also employed from July 1993 to July 1997 by the Federal Aviation Administration in Seattle as a Designated Pilot Examiner. She holds an FAA-issued Airline Transport Pilot license and has logged over 7,400 flight hours.

Mr. Steven A. Wilbur has served as Valley Air's Director of Maintenance since April 2002. He began his aviation career at Wilbur's, Inc., which was founded by his father. He served as General Manager and Vice President supervising Part 135 operations from June 1982 to

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relinquish its suspended commuter authority and its existing on-demand air taxi authority that allows it to operate interstate and foreign service, because once it holds *any interstate* authority from the Department, it must hold DOT economic authority for *all* of its operations; it cannot conduct some operations under DOT authority and others without such authority. Moreover, it was made clear to the carrier that it could not transport more than a *de minimus* volume of passengers or property moving as part of a continuous journey to or from a point outside California or its operations would be interstate and require economic DOT authority.

<sup>3</sup> Valley Air ceased its Santa Rosa-Long Beach operations in February 2003.

February 1992. From March 1992 until March 1996, he served as an Airframe and Powerplant Mechanic with Patterson Aviation. During that time, he also served as Chief Inspector with Channel Islands Aviation. Since March 1996, he has served as an Inspector with Mather Aviation, a position he will continue to hold. He holds an FAA-issued Airframe and Powerplant Mechanic certificate with Inspection Authorization.<sup>4</sup>

Mr. Eric Pohrman has served as Valley Air's Chief Pilot since August 2002. He received an Associate of Arts degree in Aviation Maintenance in May 2000 from Shasta College. He began his aviation career in February 1999 as Pilot-in-Command with Ascot Aviation. He subsequently served as Pilot-in-Command with at Sun Air (August 2000-September 2001) and Shasta Constructors, Inc. (September 2001-August 2002). Mr. Pohrman holds an FAA-issued Airframe and Powerplant Mechanic certificate and Commercial Pilot rating and has logged over 1,760 flight hours.

In view of the experience and background of the applicant's key personnel and the fact that these individuals are already managing Valley Air's intrastate scheduled operations, we tentatively conclude that Valley Air has demonstrated that it has the management skills and technical ability to conduct its proposed commuter service.<sup>5</sup>

### **Financial Condition and Operating Proposal**

As indicated above, Valley Air currently provides five round trips per week between Victorville and Long Beach using a nine-seat Cessna 208B aircraft, and proposes to increase the level of service to ten flights per week in this market with additional daily service to Las Vegas if it is found fit as a commuter air carrier.

Valley Air submitted a balance sheet as of December 31, 2002, that reflected negative working capital of \$122,460 and total equity of \$8,543. For the period from February 6, 2002, to December 31, 2002, the carrier incurred a net loss of \$455,000.

Valley Air has provided forecasts of its pre-operating costs and its first-year revenues and expenses for the proposed commuter operations. The carrier will be using the same aircraft to provide its proposed service that it is currently using to provide its intrastate scheduled passenger operations. Valley Air has indicated 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 \$12,400) and primarily limited to pilot training and check rides.

Valley Air projects first-year total operating expenses of \$773,521 for all of its operations. The carrier's estimates have been derived from its current intrastate scheduled operations. We have reviewed Valley Air's expense forecast and find that it appears to be reasonable. Therefore,

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<sup>4</sup> The FAA has advised us that it has approved Mr. Wilbur to serve with both Mather and Valley Air.

<sup>5</sup> 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.

based on our analysis of its forecast, it appears that Valley Air will need approximately \$330,000 to meet the Department's financial fitness criteria for its proposed commuter operations.<sup>6</sup>

Mr. Delgado, Valley Air's sole owner, has personally guaranteed funding for Valley Air's first year of operations and will fund the outstanding payables. Mr. Delgado has provided a personal financial statement which indicates that he has more than adequate funds to provide Valley Air with the resources needed to meet our fitness criteria.<sup>7</sup> Therefore, we tentatively conclude that Valley Air 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, we will require that the company provide updated financial information showing that Valley Air continues to have available to it funds sufficient to meet our financial fitness criteria prior to our making its commuter authorization effective.<sup>8</sup>

### **Compliance Disposition**

Valley Air appears to have a favorable 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. There have been no formal complaints filed or orders issued finding Valley Air's key personnel, or persons having a substantial interest in it to be in violation of the Transportation Code or the Federal Aviation Regulations.

Our search of the Department's enforcement files found no record or problems involving this company, its owners, or its key personnel. The FAA reports that Valley Air is overall a safe airline and that the management team is qualified for their positions. There are no FAA enforcement actions pending against the carrier and it has not had any accidents or incidents.

Based on the above, we tentatively conclude that Valley Air has the proper regard for the laws, rules and regulations governing its services to ensure that its aircraft and operations will conform to applicable safety standards and that acceptable consumer relation's practices will be followed.

### **CITIZENSHIP**

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<sup>6</sup> 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. The \$330,000 figure noted above consists of \$193,380 (which is one-quarter of the first year's projected expenses, *i.e.*, \$773,521 divided by 4) plus \$12,400 in pre-operating expenses. In addition, if a carrier's balance sheet reflects a negative working capital position, as Valley Air's does, we consider that negative amount to be additional pre-operating expenses, and the funds required to meet our financial fitness criteria must also cover this negative balance (in Valley Air's case, \$122,460). In calculating available resources, projected revenues may not be used.

<sup>7</sup> In addition to funds from Mr. Delgado, Valley Air has an agreement with Southern California Airport Authority for an annual subsidy up to \$400,000 to cover the shortfall between Valley Air's revenues and expenses for each month in operation.

<sup>8</sup> This information must include a revised list of Valley Air's pre-operating expenses, broken down between those already paid and those remaining to be paid, as well as independent verification that Valley Air continues to have available funds sufficient to cover all remaining unpaid pre-operating expenses and to provide the necessary working capital reserve.

49 U.S.C. 41102 of the Transportation Code 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 Transportation Code to mean that, as a factual matter, the carrier must actually be controlled by U.S. citizens.

As noted earlier, Valley Air is wholly owned by Valley Holdings, which, in turn, is wholly owned by Mr. William Delgado, a U.S. citizen.

Valley Air has supplied affidavits of U.S. citizenship for all of its management team and key personnel. Moreover, Valley Air has provided an affidavit attesting that it is a citizen of the United States within the meaning of the Transportation Code and that it is actually controlled by U.S. citizens. Our review of the applicant has uncovered no reason to suggest that control of Valley Air rests with non-U.S. citizens.

Based on the above, we tentatively conclude that Valley Air 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 Valley Air's fitness and commuter authority.

### **EFFECTIVE COMMUTER AUTHORIZATION CONDITIONS AND LIMITATIONS**

In the event that we find Valley Air 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.<sup>9</sup> Among other things, this includes our receipt of evidence that the carrier has been issued Operations Specifications by the FAA authorizing interstate 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 Valley Air continues to have adequate financial resources available to it to meet our financial fitness criteria.

Given the relatively limited scope of Valley Air's proposed operations we propose to limit any authority issued to the applicant to operations conducted under Part 135. Should Valley Air

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<sup>9</sup> We also reserve the right to stay the effectiveness of Valley Air's authority if any new information becomes available to us that warrants such action.

subsequently desire to acquire and operate larger aircraft that would require certification from the FAA under Part 121, it must first be determined fit for such operations.<sup>10</sup>

Further, we remind Valley Air 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 Valley Air propose any substantial changes in its ownership, management, or operations, it must first comply with the requirements of section 204.5 of our rules.<sup>11</sup> The compliance of the company with this requirement is essential if we are to carry out our responsibilities under the Transportation Code.<sup>12</sup>

### **ACCORDINGLY:**

1. We direct all interested persons to show cause why we should not issue an order finding that Valley Air Express, Inc., 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, Room PL-401, 400 Seventh Street, SW, Washington, D.C. 20590, in Docket OST-02-13159 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.<sup>13</sup>

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<sup>10</sup> In this regard, we note that the operation of scheduled passenger services with aircraft having a seating capacity of 10 or more would require the carrier to transition to Part 121 of the FARs, a step which may require the applicant to obtain additional management personnel and/or incur additional financial outlay.

<sup>11</sup> 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.

<sup>12</sup> We also remind Valley Air 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.

<sup>13</sup> Since we have provided for the filing of objections to this order, we will not entertain petitions for reconsideration.

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 Valley Air Express, Inc., a Commuter Air Carrier Authorization, subject to the attached Specimen Terms, Conditions, and Limitations.
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

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



**Specimen**  
Terms, Conditions, and  
Limitations

**VALLEY AIR EXPRESS, INC.**

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 interstate scheduled passenger operations, and any advertisement or listing of such 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 and Department of Homeland Security 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(1)), 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 VALLEY AIR EXPRESS, INC.**

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