

Served: July 27, 2004



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

Issued by the Department of Transportation
on the 26th day of July, 2004

Application of

**REPUBLIC AIRLINE, INC.
d/b/a REPUBLIC AIRLINES**

Docket OST-2003-14579

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 AMENDING CERTIFICATE

Summary

By this order, we (1) find Republic Airline, Inc. d/b/a Republic Airlines (Republic) fit, willing, and able to engage in interstate scheduled air transportation of persons, property, and mail using large aircraft and (2) amend the interstate scheduled certificate currently issued to Republic to authorize such operations.

Background

In February 2003, Republic filed an application in Docket OST-2003-14579 requesting authority to engage in interstate scheduled air transportation of persons, property, and mail. At the time, the carrier proposed to operate 50-seat Embraer EMB-145 aircraft under a code-share arrangement with US Airways, Inc (US Airways). By Order 2003-11-8, issued November 14, 2003, we found Republic fit, willing, and able to conduct the proposed operations and issued to it a certificate authorizing the company to engage in interstate scheduled air transportation of persons, property, and mail using “small” aircraft.¹

The effectiveness of Republic’s certificate authority was conditioned on, among other things, the carrier’s receiving Federal Aviation Administration (FAA) operating authority. To date, the carrier has not received its FAA certificate and, thus has not had its DOT certificate authority

¹ “Small” aircraft are aircraft designed to have a maximum passenger capacity of 60 seats or less or maximum payload capacity of 18,000 pounds or less. Since Republic presented no plans at the time to operate “large” aircraft (that is, aircraft with more than 60 seats or 18,000 pounds payload), as is our practice, we limited the carrier’s authority to the use of small aircraft.

made effective. In the meantime, Republic advises that, instead of providing code-share services with US Airways, as initially planned, it has made arrangements with United Air Lines, Inc. (United) to provide code-share services with that carrier starting in July 2004. In conducting those services, Republic plans to use 70-seat Embraer EMB-170 aircraft. Since the EMB-170 aircraft is a large aircraft under our rules, Republic cannot operate this aircraft under the certificate authority it currently holds. Thus, on March 8, 2004, Republic filed in Docket OST-2003-14579 a request for an amendment to its current certificate to authorize it to use large aircraft and to reflect its new service agreement with United.

No answers have been filed opposing Republic's request for amended authority and our review of the information indicates that the company is fit to conduct its proposed operations.

We do not view the aircraft operations currently planned by the carrier as being substantially different from those proposed initially. Under both scenarios, Republic intends to conduct code-share services with a major U.S. airline under a contract that is designed to cover virtually all of its operating costs. Moreover, we do not consider the 70-seat EMB-170 aircraft to be markedly different from the 50-seat EMB-145 the company initially intended to use, notwithstanding that one of these aircraft is considered a small aircraft while the other is considered a large aircraft. Under the circumstances, we have decided that neither an oral evidentiary hearing nor a show-cause proceeding is necessary for us to make a decision on Republic's request for amended authority. Therefore, in accordance with section 302.210(a) of our regulations (14 CFR 302.210(a)), we will proceed directly to a final order granting Republic the amended certificate authority it has requested.

FITNESS

The three areas of inquiry that must be addressed in order to determine a company's fitness under Title 49 of the United States Transportation Code ("the Transportation Code") 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.

Because the principal changes in Republic's fitness involve its new operating proposal and financial support, we will begin with a discussion of its fitness in this regard.

New Operating Proposal and Financing Plan

Republic's contract with US Airways called for it to operate as many as 23 50-seat EMB-145 aircraft as a "US Airways Express" carrier. Republic's agreement with United calls for it to provide scheduled passenger operations as a "United Express" carrier using up to 16 70-seat EMB-145 aircraft during its first year of operations. Initial flights are slated to be between Indianapolis and Washington, D.C. (Dulles International Airport), and between Indianapolis and Chicago (O'Hare International Airport), feeding passengers into United's mainline

operations.² To accommodate this change in its operating plan, Republic intends to move its base of operations from Louisville, Kentucky, to Indianapolis, Indiana. In addition to its code-share services for United, Republic also intends to conduct occasional charter flights of its own under the trade name Republic Airlines.³

In support of its ability to undertake its proposed operations, Republic provided a forecast income statement based on the number of block hours it anticipates operating during its first year of code-share services,⁴ plus a separate forecast for its own charter operations. We have reviewed these forecasts and believe them to be reasonable.⁵

With respect to its proposed United Express services, Republic contends, as it did previously, that the Department need not apply its standard financial fitness criteria in determining the company's fitness given its contractual arrangements with United.⁶ The carrier's arrangements with United appear to be similar to its previous arrangements with US Airways. Specifically, under its agreement with United, the major carrier will compensate Republic, in advance, for its services and will assume all responsibility for passenger-related reservations, ticketing, revenue collection, and re-accommodation/refund functions. In our initial show cause order in this proceeding (Order 2003-10-6, issued October 6, 2003), we noted that we do not generally find it necessary to apply our normal working capital reserve requirement in cases where a company is providing feeder services to a well-established major airline under a contract such as applicable in this case.⁷ We see no reason not to apply the same standard here.⁸

However, since Republic intends to hold out limited charter operations to the public outside of its agreement with United, it is appropriate for the carrier to establish its financial fitness to conduct those charter operations. In this connection, Republic states that it expects to operate approximately 250 block hours in charter services during its first year of operations with average expenses of approximately \$3,500 per block hour. Under this expectation, the carrier would incur approximately \$875,000 in expenses for its first year of charter operations, thus requiring approximately \$219,000 to meet our financial fitness requirement.

² United may identify additional routes in the future.

³ Republic has requested that its amended certificate authority reflect both the United Express and Republic Airlines trade names.

⁴ Republic estimates that it will operate approximately 34,641 block hours during its first year of United Express operations.

⁵ The carrier has requested confidential treatment of its expense forecasts. As discussed in the **CONFIDENTIAL TREATMENT** section of this order, we will grant Republic's request.

⁶ In evaluating an applicant's financial fitness, the Department generally asks that the company have available to it sufficient resources to cover all pre-operating costs plus a working capital reserve equal to the operating costs that would be incurred in three months of "normal" certificated operations.

⁷ See, also, Order 2000-1-25, Atlantic Coast Jet, Inc., and Order 2000-11-22, Potomac Air, Inc.

⁸ While United is currently operating under the protection of the bankruptcy court, we have no reason to conclude at this time that the carrier could not fulfill its obligations to Republic so long as it determines that Republic's services are necessary.

Republic's projected balance sheet shows that, at the commencement of operations, the company will have current assets of \$1.2 million (including \$700,000 in cash) and current liabilities of \$800,000, giving the carrier approximately \$400,000 in positive working capital. The company also projects total assets of \$73.6 million, negative retained earnings of \$1.42 million, and negative stockholder's equity of \$1.41 million. Republic's parent company, Republic Airways Holdings, Inc. (RAH), has committed to providing the funds necessary to support the carrier's operations. Thus far, RAH has provided Republic with resources to cover its pre-operating expenses, and with RAH's financial support, Republic has entered into an aircraft purchase agreement to acquire the EMB-170 aircraft

RAH's financial statements for the last three years show that the company has been profitable. For calendar years 2001, 2002, and 2003, the company reported net income of \$6.1 million, \$17 million, and \$34 million, respectively. While RAH's consolidated balance sheet at March 31, 2004, shows that it has negative working capital of \$60.2 million, its total assets exceed its total liabilities, resulting in positive stockholders' equity of \$76.6 million, against which the company should be able to borrow if needed. Further, RAH recently held an initial public offering of common stock. After deducting underwriting discounts, offering expenses, and repayment of debts to its majority stockholder, net proceeds to RAH are estimated to be \$38.8 million, which will be used as working capital for the company.

In light of the foregoing, we find that Republic will have sufficient financial resources available to it to enable it to commence its proposed large aircraft operations without posing an undue risk to consumers or their funds.

Managerial Capabilities

Republic's team of key management and technical personnel consists of the following individuals:

Bryan K. Bedford	Chief Executive Officer
Thomas M. Hanley	President and Chief Operating Officer
Alex Osleger	Director of Operations
David Ralich	Director of Quality Assurance and Chief Inspector
James Witkosky	Director of Maintenance
Rick Morganstern	Chief Pilot
David Olvey	Vice President of Safety

In our initial show cause order in this case (Order 2003-10-6, issued October 6, 2003), we discussed in detail Republic's management structure and the qualifications of its key management personnel.⁹ Republic advises us that since then, there have been only two changes

⁹ That order also indicated that Republic shares some common officers and board members with that of its parent, RAH, and its sister company, Chautauqua Airlines, a commuter air carrier. The order identifies these individuals and the positions they hold with each company.

in its management team. Both David Ralich, Director of Quality Assurance and Chief Inspector, and James Witkosky, Director of Maintenance, joined the carrier in February 2004.¹⁰

In view of the experience and background of Republic's key personnel, we find that Republic's management team possesses the managerial skills and technical ability to conduct its proposed service.

Compliance Disposition

Republic states that there have been no changes in areas impacting its compliance posture since the issuance of Order 2003-11-8.¹¹ Further, the FAA states that Republic is actively working towards meeting the agency's requirements for obtaining FAA operating authority. Thus, we find that Republic continues to hold 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

Republic states that there have been no changes in its ownership since the issuance of Order 2003-11-8. Given this, we conclude that Republic continues to be a citizen of the United States and is fit, willing, and able to conduct the interstate scheduled passenger operations proposed, subject to conditions.

REQUEST FOR CONFIDENTIAL TREATMENT

On March 8, 2004, Republic filed several documents for which it requested confidential treatment under section 302.12 of our rules: (1) Confidential Exhibit 1 - United Express Agreement between United Air Lines, Inc. and Republic Airline, Inc.,¹² and (2) Confidential Exhibit 5 - Portions of Republic's revised Projected Income Statement and Operating Statistics.¹³ Republic notes that the Department granted confidential treatment of similar

¹⁰ Prior to joining Republic, Mr. Ralich, an Airframe and Powerplant Mechanic, worked for Chautauqua Airlines for 30 years in various positions, including Director of Safety (April 2000 - June 2002), Director of Quality Control (June 2002 - September 2002), Director of Safety and Compliance (September 2002 - February 2004). Mr. Ralich also served four years in the United States Marine Corps as an aircraft mechanic.

Mr. Witkosky, an Airframe and Powerplant Mechanic, had served as Base Manager for Chautauqua Airlines from December 2000 prior to joining Republic. Mr. Witkosky has 15 years of maintenance experience and has previously worked as a mechanic for Lockheed Aeromed Center (1985-1989) and US Airways (1989-1997). Mr. Witkosky also served four years in the United States Navy as an aircraft electrician.

¹¹ Compliance information provided for Messrs. Ralich and Witkosky raise no compliance-related issues.

¹² On June 4, 2004, Republic submitted a revised copy of the United Express agreement for which the carrier also requested confidential treatment.

¹³ On April 23, 2004, Republic requested confidential treatment for the financial statements of its parent, RAH. Republic subsequently withdrew the financial statements and its request for confidential treatment

documents in connection with its initial application in this proceeding and thus believes that the above documents warrant the same treatment.

Rule 12 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. 552(b)(4) if it is (1) commercial or financial, (2) obtained from a person outside of government, and (3) privileged or confidential (*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 Republic seeks confidential treatment 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 which the information was obtained” (*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 of the type that is usually released to the public (*Gulf and Western Industries, Inc. v. United States*, 615 F.2d 527,530 (D.C. Cir 1979)).

We agree with Republic that its service agreement with United meets the Department’s criteria for confidential treatment. Also, we find that release of Republic’s first year forecast for scheduled service could harm its ability to compete by providing competitors with information on the cost structure upon which its agreement with its code-share partner is based. Therefore, we will grant Republic’s March 8 and June 4 requests for confidential treatment.

EFFECTIVE CERTIFICATE CONDITIONS

Republic’s amended certificate authority will not become effective until the company has fulfilled all of the 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 Republic has been certificated by the FAA to engage in the operations proposed and evidence that the company has obtained the liability insurance coverage required by Part 205 of our rules.

In addition, we note that our finding here of Republic’s fitness is primarily predicated on the company’s performance of scheduled passenger operations under a code-share agreement with United and the support of RAH. These findings might no longer apply if Republic were to substantially change the scope of its operations through the introduction of independent scheduled passenger operations or were the company under different ownership. Therefore, we intend to condition the effectiveness of Republic’s authority on its continued existence as a wholly-owned subsidiary of RAH and on its operation of scheduled passenger operations under the provisions of its agreement with United, or a similar agreement with another major U.S. air carrier. Should RAH seek to sell its interest in the applicant, or should Republic desire to conduct scheduled passenger operations independent of a fee-for-service agreement with a major

of the documents because the same financial statements were made available publicly in connection with the company’s public stock offering. We will, therefore, rely on RAH’s public financial statements in this proceeding and dismiss the carrier’s April 23 request for confidentiality.

U.S. air carrier, Republic must file a request to amend the terms of its certificate.¹⁴ Finally, we will require that Republic provide the Department with at least 45-days' notice of any planned expansion in the company's operation of large aircraft beyond the 16 aircraft currently proposed; such notification should include information demonstrating its fitness to implement such expansion.

Furthermore, we 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. Thus, should Republic propose other substantial changes in its ownership, management, or operations, it must first comply with the requirements of section 204.5 of our rules.¹⁵ The compliance of the company with this requirement is essential if we are to carry out our responsibilities under the Transportation Code.¹⁶

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,¹⁷ and a listing of current senior management and key technical personnel. The carrier should also be prepared to meet with staff members from of the Fitness Division to discuss its current and future operations.

¹⁴ We will not limit Republic's ability to conduct charter passenger operations.

¹⁵ 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. In addition, 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 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.

¹⁶ We remind Republic 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. For the purposes of Republic's fitness, the one-year period under section 204.7 will begin on the date of issuance of this decision.

¹⁷ 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.

ACCORDINGLY,

1. We find that Republic Airline, Inc. d/b/a Republic Airlines is fit, willing, and able to engage in interstate scheduled air transportation of persons, property, and mail using large aircraft.
2. We reissue the interstate scheduled passenger certificate of public convenience and necessity issued to Republic Airline, Inc. d/b/a Republic Airlines by Order 2003-11-8 in the form and subject to the Terms, Conditions, and Limitations attached.¹⁸
3. We direct that, should Republic Airline, Inc. d/b/a Republic Airlines propose to conduct operations with more than 16 large aircraft,¹⁹ it must first notify the Department in writing at least 45-days prior to the proposed change in operations and demonstrate its fitness to conduct such operations before their commencement.
4. We direct Republic Airline, Inc. d/b/a Republic Airlines to submit to the Air Carrier Fitness Division a first year progress report within 45 days following the end of its first year of certificated operations.²⁰
5. We grant the Motions for Confidential Treatment filed by Republic Airline, Inc. d/b/a Republic Airlines on March 8 and June 4, 2004, and we dismiss the April 23, 2004, Motion for Confidential Treatment.
6. We will serve a copy of this order on the persons listed in Attachment A.

By:

KARAN K. BHATIA
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>

¹⁸ The reissued certificate will also reflect the trade name of United Express.

¹⁹ That is, aircraft with a maximum passenger capacity of more than 60 seats or a payload greater than 18,000 pounds.

²⁰ The report shall 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 (including a balance sheet at the end of the company's first full year of operations and a 12-month incomes statement ending that same date), and a listing of current senior management and key technical personnel.



Certificate of Public Convenience and Necessity
for
Interstate Air Transportation
(as reissued)

This Certifies That

REPUBLIC AIRLINE, INC.
d/b/a Republic Airlines
d/b/a United Express

is authorized, subject to the provisions of Subtitle VII of Title 49 of United States Code, the orders, rules, and regulations issued thereunder, and the attached Terms, Conditions, and Limitations, to engage in interstate air transportation of persons, property, and mail.

This Certificate is not transferable without the approval of the Department of Transportation.

Secretary By Direction of the

Issued by Order 2004-7-26
On July 26, 2004
for

Karan K. Bhatia
Assistant Secretary

Effective on (see attached)
International Affairs

Aviation and



Terms, Conditions, and
Limitations

REPUBLIC AIRLINE, INC.
d/b/a REPUBLIC AIRLINES
d/b/a UNITED EXPRESS

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 large aircraft operations proposed under this certificate, and any advertisement or listing of such flights by the holder must prominently state: "This service is subject to receipt of government operating authority."

* This certificate is being reissued to authorize the holder to conduct large aircraft operations.

(3) The authority contained in this certificate is subject to the holder's remaining a wholly owned subsidiary of Republic Airways Holdings, Inc.

(4) The scheduled passenger authority contained herein is limited to operations performed under a fee for-service agreement with United Air Lines, Inc., or a similar agreement with another major U.S. air carrier.

(5) 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.

(6) The holder's authority under this certificate is effective only to the extent that such operations are also authorized by the Federal Aviation Administration (FAA), and comply with all U.S. Government requirements concerning security.**

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

(8) 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.

(9) The holder is authorized to conduct charter flights in interstate and/or foreign air transportation in accordance with the provisions of 14 CFR 212.

(10) 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.

** To assure compliance with all applicable U.S. Government requirements concerning security, the holder shall, before commencing any new service (including charter flights) to or from a foreign airport, contact its Principal Security Inspector (PSI) to advise the PSI of its plans and to find out whether the Transportation Security Administration has determined that security is adequate to allow such airport(s) to be served.

(11) 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.

(12) 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.

SERVICE LIST FOR REPUBLIC AIRLINES

Attachment A

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