CHARLESTON METRO
CHAMBER

June 20, 2002

Administrator Jane F. Garvey
Federal Aviation Administration
800 Independence Avenue, SW
Washington, DC 20591
VIA FASCIMILE
(202) 267-5047

Re: FAA Policy Options for Managing Capacity at LaGuardia Airport (Docket FAA-2001-9852/9854)

Dear Administrator Garvey:

On behalf of the Charleston Metro Chamber of Commerce, I am writing to express our community's serious concerns about the FAA's proposed new "demand management" policy options for managing capacity at LaGuardia Airport. We understand that the current proposals only involve LaGuardia, but we are also concerned that any "demand management" proposals adopted at LaGuardia might serve as a template for use at other airports throughout the country. We believe that many of the proposals are ill-advised and will cause significant reductions in critical air service for smaller communities like Charleston.

Although FAA is considering many different proposals, it is our understanding that under any approach the FAA has indicated it will continue its current administrative cap on the total number of operations per hour at LaGuardia airport, in the interest of safe and efficient operations. These caps have effectively resolved the congestion problems at the airport. They have eliminated any urgency in adopting untested new proposals for demand management. Because of this, the proposals being considered will not reduce congestion or delays any further. They will simply reallocate the limited capacity of the airport among the many competing demands for LaGuardia service. We are very considered that small communities will be the losers in this process, because the proposals threaten the continued viability of our access to this important airport.

Charleston's LaGuardia service would be threatened by a number of the proposed policies options under consideration by the FAA. We are concerned that proposals to dramatically increase the cost of serving the airport -- such as the congestion pricing and auction proposals -- would eliminate the commercial viability of regional jet service to small communities like ours. We are concerned that regulatory proposals designed to penalize the use of smaller aircraft will have the same result, because the use of smaller regional jets are essential to the viability of our service. Finally, we are concerned that proposals to reallocate slots to non-network carriers will also result in reduced service for small communities. Virtually all service from LaGuardia to

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small communities is provided by larger network carriers through their regional affiliates. Although new entrant carriers have initiated service at LaGuardia Airport in recent years, none of these carriers have used their slots to provide service to communities like ours. Instead, they have added flights on to heavily-traveled routes already extensively served by other carriers. Thus, reallocating slots from the larger hub-and-spoke carriers to other carriers threatens our access to the airport.

Prior to Air 21 and the advent of regional jets, Charleston had been unable to attract nonstop service to LaGuardia. Smaller communities such as ours do not generate enough traffic to fill a full-sized airliner in viable service patterns, and carriers, particularly new entrant carriers, tend to use their scarce slots to serve the most heavily traveled routes. If slots are withdrawn from carriers now serving small community routes, landing fees or other airport operating costs are raised to the point where it is no longer feasible to operate regional jet aircraft, or the FAA takes administrative steps to penalize the use of smaller aircraft at LaGuardia, small communities will be deprived of nonstop LaGuardia access contrary to Congress' intent in Air 21.

Finally, I would like to reiterate that our community has grown to depend on nonstop service to New York and the important economic benefits it provides. Cancellation of the service would have serious negative consequences, including lost business activity, lost investment, and lost jobs (to say nothing of our own visitor contributions to New York in its ongoing recovery period).

I urge you not to adopt any policies that would threaten the stability or continuation of this vital transportation benefit.

Sincerely,

Charles Van Rysselberge, CEO