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October 26, 2001

Via Telecopier and Messenger

Ms. Janet A. Davis
Senior Analyst
Air Carrier Fitness Division
Office of Aviation Analysis
U.S. DEPARTMENT OF TRANSPORTATION
400 Seventh St., SW, Room 6401
Washington, DC 20590

**Re: Application of Boston-Maine Airways Corp.,
Docket OST-00-7668 - 12**

Dear Ms. Davis:

This letter is submitted on behalf of Boston-Maine Airways Corp. (BMAC) in response to your request for clarification of three items of information contained in BMAC's Supplement No. 2 to the referenced application, filed on October 18, 2001.

1. Director of Safety Position

Captain Hobart T. Livingston has been continuously employed in the position of Director of Safety with BMAC or BMAC's sister company, Pan American Airways Corp. (Pan Am), from August 5, 1999 through to the present time.

Captain Livingston was initially employed as Director of Safety for Pan Am and served in that position with Pan Am from August 5, 1999 until April 30, 2000. On that date, Captain Livingston shifted from Pan Am to BMAC to hold the Safety Director position only with BMAC and to assist BMAC with its Part 121 certification process.

Ms. Janet A. Davis
October 26, 2001
Page 2

At that time, another individual was hired by Pan Am to fill the Director of Safety position at Pan Am. That individual left Pan Am on July 31, 2000, and was immediately replaced by Captain Livingston to fill the mandatory Director of Safety position. At that time, Robert C. Nessa was transferred from Pan Am to BMAC to fill the Director of Safety position with BMAC. That change was approved by the FAA and was reported to the DOT in BMAC's Supplement No. 1, filed on August 16, 2000 (see also, Show Cause Order 2000-9-17, p. 4).

Mr. Nessa left BMAC on September 19, 2000, creating a vacancy in the Director of Safety position. During the period between September 19, 2000 and April 9, 2001, Captain Livingston served as Safety Director for both Pan Am and BMAC on a temporary basis with the FAA's consent. On April 9, 2001, Captain Livingston returned to BMAC as its permanent full-time Director of Safety and he continues to hold that position. On the same date, another qualified individual, Colonel Thomas Bunting, was hired by Pan Am to fill the vacancy in the position of Director of Safety at Pan Am created by Captain Livingston's transfer back to BMAC.

Neither BMAC nor Pan Am anticipate any further shifts in the Director of Safety position in the foreseeable future.

2. First-Year Operating Plan

BMAC continues to plan to operate the same aircraft and frequency of services in the Portsmouth-Bangor and Sanford-Fort Myers markets which it proposed in its initial application, although the planned commencement of that service has been significantly delayed by the unexpected amount of time required by BMAC's Part 121 certification process. As indicated by BMAC previously (Supplement No. 1, p. 2), BMAC plans to dedicate a total of six (6) Jetstream aircraft to serve those two markets, with two aircraft serving as back-up spares while performing other ad hoc charter flights.

As noted in BMAC's Supplement No. 2, BMAC also now plans to operate three daily scheduled roundtrip flights over a BWI-Cumberland-Hagerstown routing (two roundtrips on Saturday and Sunday) pursuant to an Air Service

Ms. Janet A. Davis

October 26, 2001

Page 3

Agreement with the State of Maryland Aviation Administration. The Maryland service is expected to require the full-time utilization of one Jetstream aircraft, with other Jetstreams in BMAC's fleet available as back-up spares, as needed.

The reference to "six Jetstreams which are not required" for first-year scheduled service operations (Supplement No. 2, p. 5) is a typo, and should read "three Jetstreams which are not required . . ."

3. Bank of New Hampshire Checking Account

As a result of an administrative oversight, BMAC has not yet changed the name on its corporate checking account with the Bank of New Hampshire from the name of its predecessor corporation "Arlington Leasing, Inc., d/b/a Pan Am Services" to "Boston-Maine Airways Corp."¹ BMAC owns, and has sole access to, the funds in that account, and has begun the process of changing the name on that account effective as early as possible next week. BMAC will provide third-party confirmation of the change of name in which that checking account is held, and confirming the current balance in that account, to the Department as soon as the name change has become effective.

I hope that the foregoing comments provide a complete and satisfactory response to your questions. Please do not hesitate to call me if you desire any further information.

¹ Arlington Leasing, Inc., d/b/a Pan Am Services, continues to function as a fixed-base operator at Pease International Tradeport in Portsmouth, New Hampshire (see, Supplement No. 1, p. 4). Arlington Leasing is operating wholly independently of BMAC, and does not draw upon, or have access to, the funds in BMAC's Bank of New Hampshire checking account.

ShawPittman LLP

Ms. Janet A. Davis
October 26, 2001
Page 4

A copy of this letter is being filed in Docket OST-00-7668 and served on all persons served with BMAC's application, as listed on the attached Service List.

Sincerely,



Nathaniel P. Breed, Jr.
SHAW PITTMAN LLP

Attorneys for
BOSTON-MAINE AIRWAYS CORP.

Attachment

cc: Docket OST-00-7668 and all parties

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