



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

Issued by the Department of Transportation
on the 12th day of August, 2008

Application of

AIR GRECO, INC. d/b/a WINGS AIR

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

Docket DOT-OST-2008-0154

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

Summary

By this order, we tentatively find that Air Greco, Inc d/b/a Wings Air (“Wings 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 conditions.

Background

Section 41738 of Title 49 of the United States Code (“the Statute”) and section 298.32 of the Department’s Aviation Economic Regulations (14 CFR 298.32) 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 an air carrier’s fitness are whether the applicant: (1) will have the managerial skills and technical ability to conduct the proposed operations, (2) has sufficient financial resources to commence the operations proposed without posing an undue risk to consumers or their funds, and (3) will comply with the Statute and regulations imposed by federal and state agencies. We must also determine that the applicant is a U.S. citizen.

On May 5, 2008, Wings Air filed an application in Docket DOT-OST-2008-0154 for authority to conduct scheduled passenger operations as a commuter air carrier pursuant to section 41738 of the Statute. Wings Air accompanied its application with the fitness information required by section 204.3 of our regulations.¹

¹ Wings Air filed additional information on June 18, July 2, and July 10, 2008.

No answers opposing Wings Air'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 we tentatively conclude that Wings Air is a U.S. citizen and is fit, willing, and able to provide scheduled passenger operations as a commuter air carrier. However, we will give interested persons an opportunity to show cause why we should not adopt as final these tentative findings and conclusions.

FITNESS

The Company

Wings Air, an air taxi operator providing on-demand air transportation under Part 135 of the Federal Aviation Regulations ("FAR") and Part 298 of our regulations (14 CFR 298), was organized as a corporation under the laws of the State of Florida in 1996. Shortly thereafter, the company began operations between South Florida and the Bahamas using one aircraft.

In 2005, Messrs. Charles Mintz and Robert Rupard acquired the company and moved its base of operations to North Georgia. After moving to Georgia, the air carrier began providing on-demand air transportation from its base of operations in Lawrenceville, Georgia, primarily serving markets within Georgia and between the Atlanta Metro area, and certain vacation and/or resort destinations such as Charleston/Kiawah Island, South Carolina; Destin, Florida; and St. Simons Island, Georgia.

Managerial Competence

Wings Air's Board of Directors consist of the following individuals, all of whom are U.S. citizens: Charles Mintz (Chairman), H.G. Allen, Daniel Dodson, Janice Galleshaw, Linda Ingle, Allen KenKnight, Ben Raney, John Rausch, Charles Taylor, Hans Trupp, and Robert Rupard.

Mr. Charles Mintz is the Chairman and Chief Executive Officer of Wings Air. He is responsible for the day-to-day business operations of the applicant, such as sales, marketing, customer service, accounting, and information technology functions. Prior to this, Mr. Mintz operated his own company, Promo-Travel International, Inc., providing non-cash prizes to lotteries (1994 to 2005). From 1988 to 1994, he was a sales manager for VERSYSS Corporation, selling turn-key IT systems to physicians' offices and from 1977 to 1988, he held a variety of computer programming- and sales-related positions.

Mr. H.G. Allen is a member of Wings Air's Board of Directors, holding an MBA in Real Estate Finance and in Marketing Management from Georgia State University. He is the Chief Executive Officer of Craftsman Mortgage LLC of Marietta, Georgia, specializing in brokering mortgages. Beginning in the mortgage industry in 1968, Mr. Allen has had a series of progressively responsible positions in that industry culminating in his current position.

Mr. Daniel Dodson is a member of Wings Air's Board of Directors. He has been employed with Mastermind Marketing, Inc., since 1984, and has, since then, held various positions with the company until 2001, when he became its Chairman and Chief Executive Officer. Prior to this, Mr. Dodson was a Staff Accountant at Gross, Collins, & Cress, P.C.

Ms. Janice Galleshaw is a member of Wings Air's Board of Directors. She is a physician, having graduated from the Medical College of Georgia, the Bowman School of Medicine, and the University of Alabama at Birmingham. Ms. Galleshaw is the Principal Investigator for STAR Trial and a Physician and Sub-Investigator for Georgia Cancer Specialists I, PC and publishes articles on various aspects of oncology.

Ms. Linda Ingle is a member of Wings Air's Board of Directors and its treasurer. She has a Bachelor of Business Administration from Texas A&M University, and is the Senior Vice President of the Gainesville Bank & Trust supervising loan officers (1995 to 2007). From 1990 to 1995, Ms. Ingle was a Loan Officer for Sun Trust Bank, and from 1988 to 1990, she was an Office Manager for Reppard Bennett, DMD.

Mr. Allen KenKnight is a member of Wings Air's Board of Directors. He is currently employed as a Mortgage Broker and has earned awards from the Mortgage Bankers Association each year from 1998 through 2004.

Mr. Ben Raney II is a member of Wings Air's Board of Directors. He is currently the Senior Vice President of Barry Real Estate Consulting and has, since 2002, headed their consulting services team often representing tenants in large construction projects and redevelopment projects. Prior to his current position, Mr. Raney has held a series of positions facilitating real estate development, having begun his carrier in real estate in 1985.

Mr. John Rausch is a member of Wings Air's Board of Directors. Mr. Rausch has a degree in Mechanical Engineering from the University of Nebraska. He is the founder and President of Capital City Mechanical Services, Inc., and Capital City Electrical Services, Inc.

Mr. Charles Taylor is a member of Wings Air's Board of Directors. From 1988 to the present, he has been the Chief Executive Officer and legal counsel for the HT Group, a real estate acquisition, management, and development company in Atlanta.

Mr. Hans Trupp is a member of Wings Air's Board of Directors. He has a Bachelor of Science degree in Industrial Management from Clemson University and is a real estate developer on St. Simons Island, Georgia. Mr. Trupp is a former Navy fighter pilot and a lifelong aviation enthusiast who is knowledgeable in the Georgia coastal aviation markets.

Mr. Robert G. Rupard is President, Director of Operations, and Director of Wings Air. Prior to purchasing an ownership interest in the applicant in 2005, Mr. Rupard was employed as a Line Pilot for Airstar, Inc., a Part 135 operator (2004 to 2005), and a General Contractor (1996 to 2005).

Mr. Arthur Moore, an Airframe and Powerplant Mechanic, has been the Director of Maintenance for Wings Air. He is responsible for all aircraft maintenance, inspections, and all modifications to the aircraft. Before joining the applicant in April 2008, Mr. Moore owned and operated Eastern Winds Aviation, Inc. (2006 to 2008), served as Vice President and Chief Inspector of Dumont Aviation, Inc. (2004 to 2006), and Chief Inspector of Aircraft Specialists, Inc. (2000 to 2004). From 1979 through 2000, Mr. Moore was employed by Northwest Airlines, holding various positions, including Airframe/Avionics and Powerplant Technician, Third-Party Maintenance Project Manager, and Manager.

Ms. Gerri Courtright has been Wings Air's Director of Flight Operations, responsible for flight coordination, tracking, scheduling and regulatory compliance, since April 2007. Prior to that, she was a Dispatcher for Players Air (2006 to 2007). From 2000 to 2005, Ms. Courtright was employed by Atlantic Coast Airlines/Independence Air, holding various positions with the company, including Dispatcher, Air Transportation Supervisor, and Aircraft Router. She also served as a Flight Attendant with Northwest AirlinK (1996-1997).

Mr. Sam Manze, an Airline Transport Pilot, currently serves as Wings Air's Chief Pilot. Before joining the applicant in 2006, he was a Corporate Pilot for several companies, including RSE Aircraft Sales and Leasing (2004 to 2006) and private individuals (1996 to 2004). From 1992 to 1995, Mr. Manze served as the Director of Operations and Chief Pilot for the late Davey Alison, managing two fixed wing aircraft and one helicopter. He also was Vice President of Pensacola Aviation Center, a fixed-base operator in Pensacola, Florida (1979 to 1992).

In view of the experience and background of the applicant's key personnel, we tentatively conclude that Wings Air has demonstrated that it has both senior management and key technical supervisors who have the managerial skills and technical ability to support its proposed operations. Moreover, the Federal Aviation Administration (FAA) has advised us that each of the applicant's key personnel have been found qualified to hold their respective positions.

Operating Proposal and Financial Plan

If granted the commuter authority it seeks, Wings Air plans to provide scheduled passenger service between Athens, Georgia, and Atlanta Hartsfield-Jackson International Airport ("ATL") and between Macon, Georgia, and ATL, using five Piper Chieftain aircraft configured for up to nine passenger seats. The applicant initiated service between these points as an air taxi operator on June 16, 2008, providing up to four scheduled round trip flights per week in accordance with Part 298.

Wings Air provided forecasts of its pre-operating costs and first-year revenues and expenses for its proposed commuter operations. As noted above, the applicant will operate the same aircraft currently used in its air taxi operations. In particular, Wings Air expects to incur \$84,025 in pre-operating expenses and approximately \$4.4 million in first year expenses. Based on these forecasts, we find Wings Air's expense projections to be reasonable and estimate that Wings Air will need approximately \$1.2 million to meet the Department's financial fitness criteria.²

Wings Air states that it has sufficient funds to cover its pre-operating costs plus one-fourth of its operating expenses it expects to incur during the first year of scheduled operations. In support of its financial condition, Wings Air provided evidence that it has, as of June 16, 2008, approximately \$1.2 million on deposit in its name. In addition, the applicant provided its most

² In establishing financial fitness, the Department typically asks an applicant to demonstrate that it has 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 operations. In determining available resources, projected revenues are generally not included. The \$1.2 million noted above consists of the applicant's pre-operating expense forecast of \$84,025 plus \$1.1 million, which is one-quarter of Wings Air's estimated first-year expenses.

recent balance sheet at March 31, 2008, which showed that Wings Air had positive working capital of \$64,440, and a current assets to current liabilities ratio of 1.03 to 1.

In light of the above, we tentatively conclude that Wings Air has access to sufficient financial resources to enable it to commence the proposed operations without posing an undue risk to consumers or their funds.³

Compliance Disposition

The applicant states that there are no actions or outstanding judgments against it, its owners, 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. Wings Air 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.

Further, a review of our records and other information available to us has uncovered no information which would reflect negatively on the applicant or any of its key personnel. The FAA reports that Wings Air has a satisfactory compliance disposition, that its management team is qualified for their positions, and that it knows of no reason why we should act unfavorably on the company's commuter application. Moreover, the applicant notes that neither it nor any of its key personnel have been involved in an accident or incident in the year preceding its application or at any time in the past which remains under investigation by the FAA, the NTSB, or the company itself.

In light of these circumstances, we tentatively conclude that Wings Air 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 relation practices will be followed.

CITIZENSHIP

The Statute 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 interest be owned by U.S. citizens. The air carrier must, as a factual matter, actually be controlled by U.S. citizens.

As stated previously, Wings Air organized under the laws of the State of Florida and its president, all of its Board of Directors, and all other managing officers are U.S. citizens. Ownership of the applicant is majority held by the following individuals: Messrs. Mintz (36.4 percent voting and 32.9 percent total equity), Rupard (28.0 percent voting and 25.3 percent total equity), and Hornsby (22.4 percent voting and 20.2 percent total equity). No other shareholders

³ As is our practice, prior to making any authority awarded to Wings Air effective, we will require the company to demonstrate that it continues to have the financial resources needed to meet our financial fitness criteria.

hold 10 percent or more interest in the applicant.⁴ Moreover, the company has supplied an affidavit attesting that it is a citizen of the United States and under the actual control of U.S. citizens. Further, our review of Wings Air's citizenship has uncovered no reason to suggest that control of Wings Air rests with non-U.S. citizens.

In light of the foregoing, we find that Wings Air is owned and actually controlled by U.S. citizens, consistent with 49 U.S.C. 40102(a)(15) and is fit, willing, and able to provide the proposed commuter operations, subject to conditions.

OBJECTIONS

We will give interested persons 7 business 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 3 business days thereafter.⁵ 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 Wings Air's fitness and commuter authority.

EFFECTIVE COMMUTER AUTHORIZATION CONDITIONS AND LIMITATIONS

If Wings Air is found fit and issued the commuter authority 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 authorization.⁶ Among other things, this includes our receipt of evidence that Wings Air 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 for all of its aircraft, third-party verification of available funding necessary to meet the Department's fitness requirements, and a statement of changes it may have undergone since its fitness was examined. In addition, consistent with the applicant's proposed operations, we propose to limit any authority issued to Wings Air to operations using aircraft that can be operated under FAR Part 135 (in effect, aircraft with no more than 9 seats in scheduled passenger operations). Should Wings Air desire to acquire and operate larger aircraft that would require certification from the FAA under 14 CFR Part 121, our

⁴ The remaining 13.2 percent voting interest in Wings Air is held by 12 U.S. shareholders and the remaining 21.6 percent total equity is held by 27 U.S. shareholders.

⁵ The applicant requested that the period for filing objections be shortened from 14 to 7 days and, since no objections were filed and in light of our tentative findings here, we will grant Wings Air's request.

⁶ We also reserve the right to stay the effectiveness of Wings Air's authority if any new information becomes available to us that warrants such action.

fitness findings, particularly involving the adequacy of the air carrier's management and financial resources, might no longer apply.⁷ Therefore, should Wings Air desire to operate aircraft that would require certification from the FAA under Part 121, it must first provide the Department with at least 45-days advance notice of such plans and provide updated information establishing its fitness for such expansion.

Furthermore, we remind Wings Air of the requirements of 49 U.S.C. 41110(e). Specifically, that section requires that, once an air 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. Therefore, in this regard, should Wings 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.⁸ The compliance of the company with this requirement is essential if we are to carry out our responsibilities under section 41110(e).⁹

Additionally, if Wings Air is granted effective authority, it would be required to submit a detailed progress report, within 45 days following the end of the first year of actual commuter flight operations, to the Air Carrier Fitness Division. The submission of a first-year progress report is conditioned upon all newly authorized air carriers and was adopted as policy by the Department to aid in monitoring the fitness of new carriers. The report should include a description of the air carrier's current operations (number and type of aircraft, principle markets served, total number of full-time employees), a summary of how its operations have changed during the year, a discussion of any changes it anticipates from its current operations during its second year, current financial statements,¹⁰ and a listing of current senior management and key technical personnel. The air carrier should also be prepared to meet with staff members of the Fitness Division to discuss its current and future operations.

⁷ We note that the operation of larger or turbojet aircraft could require the air carrier to have access to additional funds and/or hire additional management personnel.

⁸ The air 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 air carrier fails to file this updated information or if the information fails to demonstrate that the air 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.

⁹ We also remind Wings 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 commuter 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.

¹⁰ These financial statements should include a balance sheet as of the end of the company's first full year of certificated flight operations and a 12-month income statement ending that same date.

ACCORDINGLY:

1. We direct all interested persons to show cause why we should not issue an order finding that Air Greco, Inc. d/b/a Wings Air 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 grant the request of Air Greco, Inc. d/b/a Wings Air to shorten the time for filing objections to the tentative findings made herein to 7 business days and for answers to any objections to 3 business day thereafter.
3. We direct any interested persons having objections to the issuance of an order making final any of the proposed findings, conclusions, or award of authority set forth here to file them with Department of Transportation Dockets, 1200 New Jersey Ave, S.E., West Building Ground Floor, W 12-140, Washington, D.C. 20590, in Docket DOT-OST-2008-0154 and serve them upon all persons listed in Attachment A no later than 7 business days after the service date of this order; answers to objections shall be filed no later than 3 days thereafter.
4. 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.¹¹
5. 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.
6. We will serve a copy of this order on the persons listed in Attachment A.
7. We will publish a summary of this order in the Federal Register.

By:

MICHAEL W. REYNOLDS
Acting Assistant Secretary
for Aviation and International Affairs

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

¹¹ Since we have provided for the filing of objections to this order, we will not entertain petitions for reconsideration.



SPECIMEN

Terms, Conditions, and Limitations

AIR GRECO, INC. d/b/a WINGS AIR

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 scheduled passenger operations, 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 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 may not operate aircraft designed to have a maximum passenger capacity of more than 60 seats or a maximum payload capacity of more than 18,000 pounds.

(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, including, but not limited to 49 CFR Part 1544.**

(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 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.*

(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 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.*

** 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.*

SERVICE LIST FOR

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