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February 1, 2006

Mr. Dennis J. DeVany
Chief, Essential Air Service Division, X-53
400 Seventh St. S.W.
Washington, DC 20590

Re: January 19, 2006 Letter, Requesting Comments on Essential Air Service for Athens Georgia.

Dear Mr. DeVany,

Thank you for the opportunity to provide comments on the Essential Air Service (EAS) market for the Athens Airport.

After much review, we feel that Option 2 -18 round trips per week, would be the prudent choice for Athens. Attached is a letter from the Airport Authority outlining their reasoning for this choice. As indicated, a 13 round trip option would not be adequate to meet the needs of our community.

In addition, the Athens Airport is developed and maintained primarily by the Federal Aviation Administration's Airport Improvement Program (AIP). This program is designed to assist airports in meeting the Federal Aviation Regulations governing commercial airports such as Athens. In order to maintain our current level of grant monies offered by the FAA AIP, we must maintain 10,000 or more commercial passenger enplanements. In 2000, 2002 and 2004 we reached that level of passengers, in part, by of having a third daily flight. With only two flights in 2005, we did not reach the 10,000 passenger requirement for maintaining our current level of AIP funding.

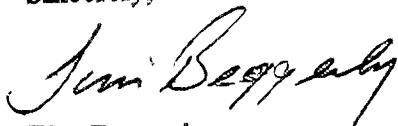
If the Essential Air Service Program only approves the 13 round trip option for Athens verses the requested 18 round trip option, the money saved would equal \$313,802 annually or \$627,604 for the term of the 2 year contract. But as our passenger trends indicate, if the 18 round trip option were approved, the airport should meet the minimum amount of passengers required to maintain our AIP funding levels of \$1,000,000 annually. If not, we would potentially lose \$850,000 annually or \$1,700,000 for the contract period. If these factors were applied to a benefit to cost ratio using AIP funding saved, less the additional expense of option 2; it would realize a savings for the Athens Airport of \$1,072,396 for the contract period. Therefore, in our opinion, the benefit of the additional AIP funding outweighs the additional cost of option 2.

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As stated in your letter to us, we sincerely hope that you carefully consider our comments before submitting a recommendation to the Assistant Secretary. The third daily flight will not only help in meeting the transportation needs of our community but will also develop and maintain the airport to attract and support future commercial air service.

Sincerely,



Tim Beggerly,
Airport Manager

C: Athens Airport Authority
Air Midwest

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