



**U.S. Department of  
Transportation**

Office of the Secretary  
of Transportation

DEPT. OF TRANSPORTATION  
DOCKETS

1200 New Jersey Avenue, SE  
Washington, DC 20590

2008 JUL -8 P 4: 10

July 8, 2008

Mr. Aaron A. Goerlich  
Garofalo Goerlich Hainbach PC  
1200 New Hampshire Avenue N.W.  
Washington, D.C. 20036-6802

Dear Mr. Goerlich,

We have reviewed the information filed in Docket DOT-OST-2008-0154 by Air Greco, Inc. d/b/a Wings Air ("Wings Air"), in support of its application for commuter authority. This review has revealed the need for additional and/or clarifying information before we can completely process Wings Air's application.

To enable us to complete our review, we ask that Wings Air provide us with the following information:

1. The information you provided on June 18, 2008 ("Supplement #1"), states that Mr. Michael Hornsby was issued an additional one million shares of voting common stock, increasing his ownership interest in Wings Air to two million shares or 20.2 percent. You also stated that as a result of the issuance of additional stock, the ownership interests of Messrs. Charles Mintz and Robert Rupard have been diluted to 32.9 percent and 25.3 percent, respectively. While you have accounted for the voting interests of Messrs. Hornsby, Mintz, and Rupard, we have little information about the individuals who own the remaining 14.9 percent of the outstanding voting shares and the remaining 21.65% of the total shares owned. Therefore, please indicate the number of voting shareholders and the number of non-voting shareholders and the percentage of voting and non-voting shares held by each.
2. The composition of the complete membership of the Board of Directors remains unclear. For instance, did Mr. Hornsby become a member of Wings Air's Board? If so, please provide the date he became a member. In addition, are all of the Board members U.S. citizens? If not, please identify those that are not U.S. citizens and their citizenship.
3. We need complete resumes for certain of Wings Air's management. A complete resume should include the individual's full name, citizenship, current address, and telephone numbers, together with a detailed listing of all previous employment (both aviation and non-aviation) and education and training. The employment listing should include the name of employer, location (city, state), type of business, position(s) held,

description of responsibilities, and dates employed. Further, if the employer held any aviation authority, the type of authority held should be noted. Therefore, please provide complete resumes for the following individuals.

- a. Daniel Dodson
- b. Michael Hornsby
- c. Allen Ken Knight
- d. Ben Raney II
- e. John Rausch
- f. Rick Daigle\*
- g. Howard Hatcher\*
- h. William Maher\*
- i. Arthur Moore\*

\* The resumes for these individuals do not include Wings Air as the current employer.

4. Please account for the gap in employment of Gerri Courtright (between 11/2000 and 10/2005) and for Janice Galleshaw (between 6/1990 and 5/1991).

5. In the application, Linda Ingle is listed only as a member of Wings Air's Board. However, in her resume, she is listed as Wings Air's Board member and treasurer. Please clarify all positions Ms. Ingle holds with the applicant.

6. Mr. Robert Rupard is listed in the application as being a member of Wings Air's Board, its President, and its Director of Operations. However, his resume only lists him as holding the position of President of Wings Air. Please clarify all positions Mr. Rupard holds with the applicant.

7. Please provide information about the company or individual from which Wings Air leases its aircraft.

8. Please explain why the categories for assets and current liabilities listed on Wings Air's forecast balance sheet differ from its actual balance sheet at March 31, 2008.

Please include a statement signed by a representative of the air carrier [who shall be a principal owner, senior officer, or internal counsel of the carrier] indicating that, pursuant to Title 18 United States Code Section 1001, the information provided in response to this letter is true and correct and that the aforementioned individual has not knowingly and willfully falsified, concealed or failed to disclose any material fact or made any false, fictitious, or fraudulent statement in connection with the preparation or filing of the material submitted.

Thank you for your cooperation in this matter. I ask that you respond fully to this request within 21 days of the date of this letter. The original plus 6 copies of your response should be filed in Docket DOT-OST-2008-0154. If you have any questions regarding this letter or

the requested information, please feel free to contact Rick Pittaway of my staff at (202) 366-9721.

Sincerely,

A handwritten signature in black ink, appearing to read 'L. Remo', with a large, stylized initial 'L'.

Lauralyn J. Remo, Chief  
Air Carrier Fitness Division  
Office of Aviation Analysis

cc: Docket DOT-OST-2008-0154

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