



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

Issued by the Department of Transportation
on the 3rd day of June, 2015

Fitness Determination of

**MENAGERIE ENTERPRISES, INC.
d/b/a MONARCH AIR**

Docket DOT-OST-2014-0192

as a commuter air carrier under 49 U.S.C. § 41738

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

Summary

By this order, we tentatively conclude that Menagerie Enterprises, Inc. d/b/a Monarch Air (“Monarch”), is a citizen of the United States and is fit, willing, and able to conduct scheduled passenger operations as a commuter air carrier.

Background

Section 41738 of Title 49 of the United States Code (“Transportation Code”) and section 298.50 (a)(2) of the Department’s Aviation Economic Regulations (14 CFR § 298.50 (a)(2)) 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 a company’s fitness are whether the applicant (1) will have the managerial skills and technical ability to conduct the proposed operations, (2) will have access to resources sufficient to commence operations without posing an undue risk to consumers, 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 November 7, 2014, Monarch filed an application in Docket DOT-OST-2014-0192 for authority to provide scheduled passenger operations as a commuter air carrier pursuant to section

41738 of the statute. Monarch accompanied its application with the fitness information required by section 204.3 of our regulations.¹

No answers opposing Monarch'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 Monarch is a U.S. citizen and is fit, willing, and able to provide its proposed commuter operations. However, we will give interested persons an opportunity to show cause why we should not adopt as final our tentative findings and conclusions.

FITNESS

The Applicant

Monarch, an air taxi conducting on-demand operations under Part 135 of the Federal Aviation Regulations ("FARs") (14 CFR Part 135) and Part 298 of the Department's regulations (14 CFR Part 298), is based in Addison, Texas, and was formed as a corporation under the laws of the State of Texas on August 24, 1984. The company operated as a flight school, aircraft rental facility, and retail pilot shop before it received its Part 135 operating certificate from the FAA authorizing it to engage in passenger air transportation in August 1988. In addition to the aforementioned operations and services, Monarch also functions as an aircraft and aircraft part sales facility, an aircraft management company, and a 14 CFR Part 145 repair station. Monarch is wholly-owned by Mr. Raymond F. Sawtelle, Jr., a U.S. citizen.

Managerial Competence

Monarch's management and key personnel consist of the following individuals, each of whom is a U.S. citizen:

Mr. Raymond F. Sawtelle, Jr. – Owner and Chairman of the Board
 Mr. Raymond F. (Trey) Sawtelle III – President and Director of Operations
 Mr. Robert E. Johnson – Director of Maintenance
 Mr. Shaun Braley – Chief Pilot

Mr. Raymond F. Sawtelle, Jr., an Airline Transport Pilot with over 30,000 hours of total flight time, is the air carrier's owner and Chairman of the Board. He is also the sole owner of Menagerie Aircraft Management LLC, Trey Aviation LLC, and Trey Aviation Inc. (1986-present).² Previously, Mr. Sawtelle was employed by Delta Airlines for over 30 years, initially as a Part 121 line pilot and later as a Captain flying the Lockheed L-1011 Tri-Star aircraft (1966-1997). He also served 8 years in the U.S. Air Force as Captain in the 8th Tactical Fighter squadron flying F-100 Super Sabre fighter aircraft (1958-1966). Mr. Sawtelle also holds an

¹ Monarch supplemented its application with additional information, most recently by letter dated April 23, 2015.

² Menagerie Aircraft Management LLC manages one King Air 350 aircraft to shuttle clients to and from El Dorado Casino in Shreveport, Louisiana, and Addison Airport in Dallas County, Texas. Trey Aviation LLC is an aircraft leasing company that currently owns one Westwind jet aircraft which is leased to Monarch for use in its charter operations. Trey Aviation, Inc., is an aircraft leasing company for smaller aircraft typically used for flight training purposes.

Airframe and Powerplant mechanic certificate and Pilot type ratings for B-727, DC-9, L-1011, CE-500, and IAI-1124 aircraft.

Mr. Raymond F. (Trey) Sawtelle III, an Airline Transport Pilot, has been Monarch's President and Director of Operations since 1991. Prior to joining Monarch, Mr. Trey Sawtelle held pilot positions, including Flight Engineer and First Line Officer for American Airlines, Inc. (1999-2008), and Line Captain and Check Airman for Express One International (1997-1999). Mr. Trey Sawtelle has 11,000 hours of total flight time and holds Pilot type ratings for the following aircraft: B-727, B-737, CE-500, BE-300, and IAI-1124.

Mr. Robert E. Johnson serves as the air carrier's Director of Maintenance (2001-present). Before coming to Monarch, he was President for ADS Aircraft Services Inc. (1987-2001); Shop Foreman and Chief Inspector for Campbell Aviation (1981-1987); Aircraft Mechanic for Chaparral Aviation (1980-1981); and Test Cell Operator for Cooper Airmotive (1980). Mr. Johnson also served as an Aircraft Electrician for the U.S. Navy and Naval Reserve (1976-1982). He received an Airframe and Powerplant mechanic certificate in 1980.

Mr. Shaun Braley, an Airline Transport Pilot, was promoted as the Chief Pilot in December 2014 after previously holding multiple positions with Monarch, including Assistant Chief Pilot (2010-2014), Pilot (2006-2010) and Flight Instructor (2005-2006). Mr. Braley holds a Bachelor of Science degree in Aviation and is a Certified Flight Instructor (CFI) and Certified Flight Instructor-Instrumentation (CFI-I).

In view of the experience and background of the applicant's key personnel, we tentatively conclude that Monarch has demonstrated that it has both senior management and key technical personnel who have managerial skills and technical ability to support its proposed operations.³

Operating Plan and Financial Position

As previously noted, Monarch is a registered air taxi and currently operates 7 small aircraft⁴ under FAR Part 135 and Part 298 of our regulations. If granted the commuter authority it seeks, Monarch intends to provide scheduled passenger air transportation exclusively for members of a newly established membership organization, Rise Alpha, LLC, a Texas limited liability company ("Rise").⁵ The applicant has entered into a five-year contract with Rise, whereby Monarch has agreed to operate up to three King Air 350 aircraft between Dallas, Texas and Houston, Texas and Dallas, Texas and Austin, Texas. During the first year of operations, Monarch anticipates operating at least four daily roundtrip flights between Dallas and Houston; and two daily

³ Before authorizing an air carrier to conduct air transportation operations, the FAA evaluates the qualifications of persons holding certain positions with respect to the minimum qualifications for those positions as prescribed in the FARs. The FAA's evaluation of these key personnel provides an added practical and in-person test of their skills and technical ability. All of Monarch's key technical personnel have been approved by the FAA to hold their respective positions.

⁴ Small aircraft is defined as any aircraft originally designed to have a maximum passenger capacity of 60 seats or less or a maximum payload capacity of 18,000 pounds or less.

⁵ Rise procures, on a volume basis, scheduled air transportation and other services, such as ground transportation, aircraft catering, and airport parking, for its members. It is not an air carrier and does not hold out, offer, sell, or provide air transportation.

roundtrip flights between Dallas and Austin during the week days and one roundtrip on each of the aforementioned routes during the weekends.⁶ According to Monarch, passengers flown on these scheduled flights will be limited to members of Rise and the flights will not be held out to the general public.⁷ Rise will pay Monarch a fixed monthly sum per aircraft to cover all operating costs. In addition, Rise has agreed to maintain a letter-of-credit for Monarch to draw down on a weekly basis to cover its operating costs on behalf of Rise's members. Moreover, Rise has agreed to provide initial start-up funding to cover much of Monarch's start-up costs, including crew training, hangar lease expenses, salaries for crew, maintenance, administrative staff, and aircraft insurance. Further, Monarch will possess a 10 percent interest in Rise.

Monarch submitted historical financial statements for calendar years 2011, 2012, and 2013 in support of its application. For calendar years 2011 and 2013, Monarch earned \$76,365 and \$190,905, respectively, on operating revenues of approximately \$6.7 million and \$6.8 million, respectively. For calendar year 2012, the company lost \$126,730 on operating revenues of approximately \$7.7 million.

The applicant's most recent financial statement submitted show that for the calendar year 2014, Monarch lost \$293,521 on operating revenues of \$6.13 million. The company's balance sheet indicates that, as of December 31, 2014, it had current assets of \$1.22 million and current liabilities of \$1.57 million giving the company negative working capital of \$351,759.

Monarch also provided a forecast of its pre-operating and first-year expenses. The applicant expects to incur \$158,800 in pre-operating costs related to aircraft insurance (\$3,000), crew salary (\$25,800), initial training (\$70,000), and professional services (\$60,000), and first year operating expenses of \$ 6.32 million.

In establishing financial fitness, the Department typically asks that the company have available to it resources sufficient to cover all pre-operating costs and any negative working capital balance, plus a working capital reserve equal to the operating costs that would be incurred in three months of normal commuter operations.⁸ We have examined Monarch's estimated expenses and find them to be reasonable. In light of its current financial projections, we estimate that Monarch will need \$2.09 million to meet the Department's financial fitness test.⁹

⁶ Monarch recently entered into an aircraft leasing agreement with N111RZ, LLC, a Texas limited liability company established by Mr. Trey Sawtelle, for use of one King Air 350 aircraft intended to initiate the Rise operations.

⁷ Monthly membership fees entitle Rise members to travel on Rise-arranged Monarch flights where space is available with no additional fees or other costs. Rise members will be able to reserve space on Rise-arranged flights, with their membership levels dictating the number of advanced reservations that can be made.

⁸ Because projected expenses during the first several months of operations do not include all costs that will be incurred during a "normal" or average period of operations, it is our practice to base our three-month test on an average of one-quarter of the first year's operating cost forecast. In addition, if the applicant's most recent balance sheet shows a negative working capital balance for any ongoing operations (*e.g.*, air taxi, aircraft leasing, or fixed base operation), the amount of that working capital deficit will be considered a pre-operating expense in calculating the amount of funds that the applicant must have available to meet the financial fitness criteria for the proposed operations.

⁹ The \$2.09 million noted above is comprised of \$158,800 in pre-operating expenses, \$351,759 in negative working capital, and \$1.58 million, which is one quarter of Monarch's first-year projected expenses of \$6.32 million.

In support of its ability to meet our financial fitness requirements, Monarch provided a letter from Legacy Texas Bank extending to the company a \$1.75 million line of credit which can be used to support Monarch's anticipated operations with Rise. In addition, Monarch submitted evidence that Rise has established a \$500,000 line of credit with Liberty Capital Bank of Addison, Texas, to support Monarch's proposed operations.

Based on our review of the documents submitted in support of Monarch's financial fitness, we tentatively conclude that Monarch has access to sufficient financial resources to commence the operations it proposes without posing an undue risk to consumers or their funds.¹⁰

Compliance Disposition

The applicant states that there are no pending legal 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 in the past ten years. Monarch 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.

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. In addition, according to the FAA, Monarch has conducted its operations in a satisfactory manner and the agency knows of no reason why the air carrier should not be granted the authority it is seeking. 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 National Transportation Safety Board, or the company itself.

In light of these circumstances, we tentatively find that Monarch 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 relations practices will be followed.

CITIZENSHIP

Section 41102 of the Transportation Code requires that an applicant for commuter 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 specifies that the president and two-thirds of the board of directors and other managing officers be U.S. citizens, that at least 75 percent of the outstanding voting interest be owned by U.S. citizens, and that the air carrier must be under the actual control of U.S. citizens.

¹⁰ As is our practice, prior to making any authority awarded to Monarch effective, we will require the company to demonstrate that it continues to have access to the financial resources needed to meet our financial test.

As previously stated, Monarch is organized as a corporation under the laws of the State of Texas. The company is wholly-owned by Mr. Raymond Sawtelle, Jr., a U.S. citizen. Monarch's key personnel are U.S. citizens and the company has provided an affidavit attesting that it is a citizen of the United States within the meaning of the Statute. Finally, there is no other information before us that would lead us to conclude that Monarch is not controlled by U.S. citizens.

In view of the foregoing, we tentatively conclude that Monarch 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 scheduled passenger operations, subject to conditions.

OBJECTIONS

We will give interested persons 5 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 days thereafter. 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 Monarch's fitness and Commuter Air Carrier Authorization.

EFFECTIVE COMMUTER AUTHORIZATION CONDITIONS AND LIMITATIONS

If Monarch is found fit and issued the Commuter Air Carrier Authorization it seeks, its authority will not become effective until the company has fulfilled all of the requirements for effectiveness as set forth in the terms and conditions attached to its authorization. Among other things, this includes our receipt of evidence that Monarch has been certificated by the FAA to engage in the subject operations, a fully executed OST Form 6410 evidencing the liability insurance coverage that meets the requirements of section 205.5(b) of our rules for all of its aircraft, and a statement of changes it may have undergone since its fitness was examined.¹¹

In addition, consistent with the applicant's proposed operations, we propose to limit any authority issued to Monarch to operations using aircraft that can be operated under 14 CFR Part 135. Should Monarch desire to operate aircraft that would require certification from the

¹¹ We also reserve the right to stay the effectiveness of Monarch's authority if any new information becomes available to us that warrants such action.

FAA under Part 121, or certificate authority from the Department under 49 U.S.C. § 41102, it must first be determined fit for such operations.¹²

Furthermore, we remind Monarch 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 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, if Monarch is issued an effective commuter authorization and should it subsequently propose substantial changes in its ownership, management, or operations, it must first comply with the requirements of section 204.5 of our rules.¹³ The compliance of the company with this requirement is essential if we are to carry our responsibilities under section 41110(e).¹⁴

Moreover, as discussed in the **FITNESS** section of this order, our finding of fitness for Monarch is based on the operating plans described in its application, namely, performing scheduled passenger operations as a commuter air carrier on behalf of Rise. Were the applicant to propose to expand its operations or wish to conduct operations independent of Rise, our fitness findings, particularly involving the adequacy of Monarch's management and financial resources, might no longer apply. Therefore, we propose to restrict Monarch's operations to scheduled commuter operations pursuant to the agreement with Rise or another company similarly structured.

Finally, if Monarch 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 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 air 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,¹⁵ and a listing of current senior management and key technical personnel. If any substantial changes in personnel have been made since the air carrier was

¹² We note that the operation of larger aircraft could require the air carrier to have access to additional funds and hire additional management personnel.

¹³ 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 air carrier's commuter authority.

¹⁴ We also remind Monarch 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.

¹⁵ These financial statements should include a balance sheet as of the end of the company's first full year of actual scheduled flight operations and a 12-month income statement ending that same date.

found fit, the Department requires the air carrier to provide updated resumes. The air carrier should also be prepared to meet with staff members of the Fitness Division to discuss its current and future operations.

ACCORDINGLY,

1. We direct all interested persons to show cause why we should not issue an order finding that Menagerie Enterprises, Inc. d/b/a Monarch 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 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 such objections with the U.S. Department of Transportation Dockets, 1200 New Jersey Avenue, S.E., Room W12-140, Washington, D.C. 20590, in Docket DOT-OST-2014-0192 and serve them upon all persons listed in Attachment A no later than 5 days after the service date of this order; answers to objections shall be filed no later than 3 days thereafter.
3. 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.¹⁶
4. In the event that no objections are filed, we will consider all further procedural steps to be waived, we will enter an order making final our tentative findings and conclusions set out here and awarding Monarch a Commuter Air Carrier Authorization, subject to the attached specimen Terms, Conditions and Limitations.
5. We will serve a copy of this order on the persons listed in Attachment A.
6. We will publish a notice of this order in the Federal Register.

By:

SUSAN L. KURLAND
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>*

¹⁶ Since we have provided for the filing of objections to this order, we will not entertain petitions for reconsideration.



Specimen
Terms, Conditions, and Limitations

MENAGERIE ENTERPRISES, INC.
d/b/a MONARCH 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 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) *When the authority contained in this Commuter Air Carrier Authorization becomes effective, the scheduled passenger authority contained herein will be limited to operations performed under an agreement with Rise Alpha, LLC or with another similarly structured company.*

(8) *The holder shall at all times remain a "Citizen of the United States" as required by 49 U.S.C. § 40102 (a)(15).*

(9) *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.*

(10) *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.*

(11) *Should the holder propose any substantial change in its ownership, management, or operations (as defined in 14 CFR § 204.2(l)), it must first comply with the requirements of 14 CFR § 204.5.*

(12) *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 operations for which it was found "fit, willing, and able" and 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 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.*

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