

ORIGINAL

DEPARTMENT OF TRANSPORTATION
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DOCKET SECTION

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BEFORE THE
U.S. DEPARTMENT OF TRANSPORTATION
WASHINGTON, D.C.

Application of

VALUJET AIRLINES, INC.

For a Certificate of Public Convenience
and Necessity under Section 401(d)(3)
of the Federal Aviation Act to engage
in passenger charter interstate/
overseas air transportation.

OST-96-1465-22

Docket No. 48428

FOURTH SUPPLEMENT TO APPLICATION OF VALUJET AIRLINES, INC.
~~FOR A CERTIFICATE OF PUBLIC CONVENIENCE AND NECESSITY~~

Communications with respect to this
document should be sent to:

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Counsel for **ValuJet** Airlines, Inc.

Date: August 20, 1993

65 pgs

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FOURTH SUPPLEMENT TO APPLICATION OF VALUJET AIRLINES, INC.
FOR A CERTIFICATE OF PUBLIC CONVENIENCE AND NECESSITY

ValuJet Airlines, Inc. (the "Company"), formerly Charter Way Inc., respectfully submits the following supplemental information in support of its application for a Certificate of Public Convenience and Necessity:

1. After further market research and the Company's recent decision to operate DC9 aircraft, the Company has revised its business plan to place greater emphasis on scheduled operations than charter service. Accordingly, the Company submits its revised business plan as Exhibit A to this Supplement.

The Company intends to begin service on October 15, 1993 with two **DC9-32** aircraft in five markets. The Company intends to operate from Atlanta to Orlando, Tampa, Jacksonville, Louisville, and Memphis. The Company has signed a letter of intent with McDonnell Douglas to purchase two aircraft with options to purchase an additional eight

aircraft. The Company also presently intends to exercise options to acquire a third and fourth aircraft from McDonnell Douglas for delivery in December 1993 and January 1994.

The increase in service proposed by the Company increases the amount of funding required to meet the Department's **financial** fitness test. However, the Company's shareholders have contributed \$3.4 Million to the Company in equity, and it is also pursuing a \$3 to \$7.5 Million private placement. In the event that the private placement is not completed, the shareholders have agreed to contribute an additional \$3 Million to cover the Company's start-up and operating costs. Evidence of the commitment by the Company's shareholders to contribute additional funds is enclosed as Exhibit B. The Company also intends to file under a Motion for Confidential Treatment personal financial information regarding Messrs. Priddy, **Flynn** and Gallagher which show their financial ability to make further investments in the Company. Accordingly, the Company presently has enough capital to meet the Department's financial fitness test.

2. The Company has also hired Richard E. Tidwell as its Chief Pilot. Mr. Tidwell has 27 years experience in the aviation industry with Delta Air Lines. Further, David L. Gentry will serve as the Company's Vice President of Maintenance. Mr. Gentry most recently served as a Hangar Systems Crew Chief for Northwest Airlines, Inc. whose duties included maintenance for DC9 aircraft, Resumes for Mr. Tidwell and Mr. Gentry are attached as Exhibit C.

3. The Company also submits the following information to update the information provided regarding its shareholders. The Company currently has four common shareholders. The names and number of shares for each shareholder is provided below:

<u>Shareholder</u>	<u>Number of Shares</u>
Timothy P. Flynn	1,500,000
Robert Priddy	1,500,000
Maurice J. Gallagher	1,500,000
Lewis H. Jordan	300,000

In addition, Mr. Jordan has an option to acquire an additional 900,000 common shares, of which options for 150,000 shares have vested and the remainder vest pro rata over the next five years. Each shareholder is a U.S. citizen.

4. Because the Company has hired additional key personnel since its original application, the Company reaffirms the following statements:

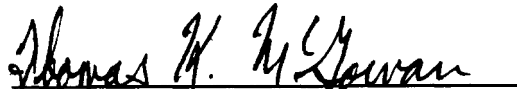
(a) There are no legal judgments outstanding or pending against **ValuJet**, any of its key personnel, any relevant corporation, or any person having a substantial financial interest in the Company, to our knowledge. The Company has never been involved as a plaintiff or defendant in any legal action.

(b) To our knowledge, neither **ValuJet** nor any of its key personnel, relevant corporations nor any person having substantial financial interest in the Company, has ever had a formal complaint lodged against them regarding compliance with the Act or with DOT's orders, rules, or regulations; nor has the FAA taken any action in the past 10 years pursuant to 14 C.F.R. § 13.1, 13.15, 13.16, 13.17, 13.19 or 13.23 against the Company, its key personnel, persons having a substantial interest in the Company, except as disclosed in Exhibit D.

(c) No known charges of unfair, deceptive or anticompetitive business practices, fraud, felony or antitrust violations have ever been brought against **ValuJet**, its key personnel, its relevant corporations, or persons having a substantial financial interest in the Company.

WHEREFORE, for the foregoing reasons, **ValuJet** Airlines, Inc. respectfully requests that the Department to continue its expeditious review of its Application for a Certificate of Public Convenience and Necessity.

Respectfully submitted,

A handwritten signature in black ink, reading "Thomas K. McGowan", is written over a horizontal line.

Curtis M. Coward, Esq.

Thomas **K.** McGowan, Esq.

McGuire, Woods, Battle & Boothe

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McLean, Virginia 22102

(703) 712-5355

Counsel for **ValuJet** Airlines, Inc.

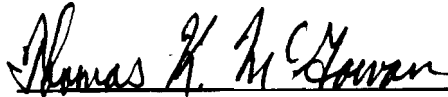
August 20, 1993

CERTIFICATE OF SERVICE

I hereby certify that the foregoing Fourth Supplement to Application of **ValuJet** Airlines, Inc. For a Certificate of Public Convenience and Necessity dated August 20, 1993 was served by first class mail, postage prepaid, to the following persons this 20th day of August, 1993:

Mr. Michael R. Pack
General Manager
Hartsfield Atlanta International Airport
P.O. Box 20509
Atlanta, Georgia 30320

Mr. Gary **LeTellier**
Executive Director
Orlando International Airport
One Airport Blvd.
Orlando, Florida 32827


Thomas K. McGowan

LIST OF EXHIBITS

<u>Description</u>	<u>Tab</u>
Revised Business Plan and Financial Statements	A
Letter from Shareholders to Company	B
Resumes of Richard E. Tidwell and David L. Gentry	C
FAA Enforcement History	D

EXHIBIT A

BUSINESS PLAN AND FINANCIAL STATEMENTS

VALUJET AIRLINES
Business Plan Summary
August 1993

ValuJet has been continually reviewing its business plan to achieve what it believes is the optimum approach. Previously, it has stated that it would initially operate charter and scheduled service. While the Company will hold itself out for traditional charter service, it plans to concentrate on scheduled service.

REVISED SERVICE PATTERN

Accordingly, ValuJet plans to begin service on October 15, 1993 (pending receipt of its 401 and 121 certificates) with two aircraft from Atlanta (ATL) to five destinations: Orlando (**MCO**), Tampa (TPA), Jacksonville (JAX), Memphis (**MEM**), and Louisville (SDF). The Company's service plan calls for two round trips in each market six days per week. Pending DOT approval, it will begin advertising its low fare service approximately **10-15** days prior to startup. The Company plans on adding a third aircraft on or about December 15, 1993. This Aircraft will begin service to Ft. Lauderdale (FLL) and New Orleans (MSY) from Atlanta. On or about January 1, 1994, a fourth aircraft will be added to supply backup and extra sections. Should sufficient demand exist, the Company will be able to add the fourth aircraft prior to January 1 in accordance with the terms of the letter of intent with McDonnell Douglas.

AIRCRAFT SELECTION AND AGREEMENT

Previously ValuJet has told the Department that it intended to operate twin engine **100+** seat Boeing 737-200 or **DC9-30** aircraft, with a preference towards the 737. After substantial market research the Company concluded that its best operational and financial option was to operate the **DC9**.

Therefore, ValuJet has signed a letter of intent with MDC for the purchase of up to 10 **DC9-32** used aircraft currently owned by MDC. Two of these aircraft are **firm** orders with the remaining eight being options. Delivery of the first aircraft is planned for September 10, 1993 with the second being delivered approximately October **1**. The Company plans on exercising two of its options of aircraft numbers 3 & 4 on or about November 1, 1993 for delivery in December and January. The remaining 6 option aircraft, if exercised, are scheduled for delivery in 1994. The Company has until November 10 to go **firm** on one of the aircraft (for potential delivery in January and February, 1994) and December 10 to **firm** up one to five of the remaining aircraft for delivery in early 1994.

The Company's obligations include a \$50,000 deposit on each aircraft with execution of a definitive agreement. Another \$250,000 per aircraft is due on August 25 for aircraft numbers 1 & 2. This brings the Company's total deposits to \$1 million. The Company will purchase Aircraft 1 & 2 concurrent with receiving its certificate(s) on or about October 5,

1993. The \$300,000 deposit on each aircraft will be the Company's down payment. MDC will provide a Purchase Money Mortgage for 5 years for the balance owing on each aircraft.

CAPITAL RESOURCES

This revised plan increases the capital requirements for the Company to meet the three month expense test required by the DOT. This increase, coupled with the DOT revised formula (using an average three months of expense based on the planned first twelve months of operation) has increased the Company's capital requirement under the DOT's fitness test to \$5.9 million.

Currently the Company has \$3.4 million of capital contributed by its 4 major stockholders. The increased capital requirements dictate that the Company add to its equity base. The Stockholders believe it is in their best interest to seek additional outside capital. Therefore, the Company is presently negotiating with Paradise Valley Securities of Phoenix, AZ, to raise between \$3 to \$7.5 million of additional capital to supplement the current equity base for the planned startup of operations.

In the event the Company is unsuccessful in this effort, the stockholders are prepared to make the necessary resources available to the Company to meet the DOT test. These individuals will make available to the DOT proof of their ability to complete this obligation.

PERSONNEL

The **final** personnel requirement to be fulfilled by the Company is a Chief Pilot. Richard E. Tidwell joined **ValuJet** as its chief pilot as of August 8, 1993.

ValuJet

Balance Sheet
For the Period Ended June **30, 1993**
(\$000)

	Jun 30 1993 <hr/>
ASSETS	
Cash	2977
Other Assets	14
	<hr/>
Total Assets	2991
LIABILITIES AND STOCKHOLDER'S EQUITY	
Accounts Payable	19
Common Stock	3100
Retained Earnings-Current Period	
Current Period	-67
Previous Balance	-61
Total Equity	2972
	<hr/>
Total Liabilities and Stockholder's Equity	2991

ValuJet

Pm-Startup Cash Coverage
June 30.1993
(\$000)

	Amounts (\$000)
Cash Balance at June 30, 1993	2,977
Private Placement/Stockholders(I)	3,000
Total Resources Available	5,977
Three Months Operating Expenses	
12 Months Operating Expenses	16,324
interest Cost for Aircraft	445
Total Expenses 12 Months	15,769
Average expenses for 1 quarter	3,942
Pre-Operating Expenses March-October 15	565
Pm-Operating Capital Expenditures	1,405
Total Resources Required	5,912

This schedule summarizes the expense test coverage **ratio** required for **fitness**. The source of the information is:

Cash - From the balance sheet; Source Exhibit A, page 3.

Expenses - Three months of expenses have been included in thii schedule. Source Exhibit A, page 6.

Pre-Operating Capital Expenditures - Source Exhibit A, page 5.

- (1) The Company **is** negotiating **with** an investment banking firm to raise equity capital of \$3 million to \$7.5 million; this financing should be completed on or before September 30, 1993. In the event this financing is not completed, the stockholders will provide the Company the resources should they be required.

ValuJet

Pre-Startup Cost Assumptions
Mar 1993 - Oct 1993
(\$000)

EXHIBIT A
Page 5

	Mar- May	Jun	Jul	Aug	Sep	Oct 1 - Oct 14	Total
PRE-START UP EXPENSES							
Management Salaries							
Operations Salaries		15	23	33	33	15	119
COO/VP Ops; VP Maint							
Director QC and VP Stations							
Admin Salaries							
VP Sales/VP Reservations		7	16	18	18	8	69
VP Purchasing/Controller							
Total Management Salaries		22	41	51	51	24	189
Crews/Dispatch					5	6	13
Maintenance					5	6	11
Stations						4	4
Flight Ops Training/Admin				10	15	22	47
Aircraft Depreciation and Interest					15	20	35
Fuel					3	19	22
Maint Reserves/Parts					3	14	17
Maint Overhead				2	2	6	10
Landing Fees					1	4	5
Aircraft Insurance					1	4	5
Start Up Advertising						75	75
stations Expense						2	2
G & A		15	10	10	15	10	60
Legal	15	15	15	15	15	10	70
Total Expenses	15	52	66	88	131	228	565
CAPITAL EXPENDITURES							
Inventory					37.5	37.5	75
Prepaid Expenses					15	40	55
Fixed Assets						75	75
Deposits-Stations(4 @ \$50,000 each)						200	200
-Aircraft						1000	1000
Total Capital Expenditures					52.5	1352.5	1405
Total Cash Flow			52	66	140.5	1483.5	1970

The above schedule summarizes the estimated costs prior to startup necessary to obtain the 401 and 121 operating certificates. Administrative activity is planned through October 15, including all applications to DOT and FAA. The personnel necessary through that time are outlined. They include mainly operations personnel, particularly flight operations and maintenance. These personnel will create the manuals and coordinate with the FAA.

Beginning in September, the Company will hire the necessary line personnel to begin operations in October and complete the proving runs, scheduled for the first 10 days of October. 30 departures and block hours have been budgeted to complete the proving runs. The appropriate fuel, landing fees and maintenance reserves have been shown. Training expenses for the crews (including flight attendants) have been shown as well as one month of aircraft rent and insurance expense.

Overhead during the prestart up consists mostly of travel expenses, rent and the controller's salary. The Company's plan calls for minimal overhead expenses. There will not be any salary paid to the founders.

ValuJet

Summary Operating Results
Oct 1993 - Sep 1994
(\$000)

	Oct	Nov	Dec	Jan	Feb	Mar	Apr	May	Jun	Jui	Aug	Sep	Total
REVENUES													
Scheduled Service	424	836	1521	1869	1858	2112	1567	1717	1743	1888	1961	1598	19093
EXPENSES													
Flight Ops	117	134	117	166	166	166	168	168	165	165	168	165	1864
Ownership	34	34	47	60	60	60	60	60	60	60	60	60	656
Fuel	135	220	363	319	294	335	316	328	322	322	335	322	3550
Maintenance	73	111	157	167	162	170	166	168	167	167	170	167	1845
Landing Fees	36	57	75	78	72	82	78	81	79	79	82	79	878
Ground Handling	198	173	225	236	218	247	234	243	238	236	247	238	2646
Insurance/Taxes	21	28	44	54	54	58	50	52	53	55	56	50	575
Reservations	32	56	87	99	99	112	83	91	92	100	104	85	1641
Advertising	50	50	50	50	50	50	50	50	50	50	50	50	600
Comm/Cred Card	21	42	76	93	93	106	78	a6	87	94	98	80	955
G & A	58	58	60	60	60	60	60	60	60	60	60	60	714
Expenses	685	963	1241	1381	1320	1445	1342	1387	1374	1391	1430	1357	15324
Operating Income	-261	-127	286	487	530	666	225	330	369	497	531	241	3769
Interest Expense	31	39	39	39	38	38	38	37	37	37	36	36	445
Pre-tax Income	-292	-166	241	448	492	628	187	293	332	460	495	295	3324
Tax(40%)													1329
Net income													1994
Summary Statistics													
Monthly Departs	255	408	529	555	512	582	550	571	561	561	582	561	6226
Passengers	11466	20384	31752	36065	35851	40748	30238	33138	33634	36436	37836	39831	378380
Aircraft Miles(000)	91	149	208	220	203	231	218	226	222	222	231	222	2442
RPMs(000)	4101	7450	12482	14282	14197	16136	11974	13123	13319	14429	14984	12209	148686
ASMs(000)	9843	16093	22467	23729	21994	24896	23513	24435	23974	23974	24896	23974	263699
Block Hours	280	459	631	664	613	697	658	684	671	671	697	671	7397
Gallons Fuel(000)	224	367	505	531	491	558	527	547	537	537	558	537	5917
Load Factor(%)	41.7	46.3	55.6	69.2	64.6	64.8	50.9	53.7	55.6	66.2	60.2	50.9	56.4
Yield(cents)	10.34	11.22	12.19	13.69	13.69	13.69	13.99	13.69	13.99	13.99	13.99	13.99	12.84

This schedule summarizes the first year's activity for ValuJet. The Company anticipates having authority to operate by October 5. Based on this date, it will begin operations in October. it will begin advertising for an October 15 start of its scheduled service 2 weeks before startup (assuming DOT approval).

The attached schedules summarize the revenue and expense assumptions. The key assumption is that the company will operate with only 2 aircraft through December 15, unless demand dictates otherwise. This forecast assumes a third aircraft can be added December 15.

ValuJet

Expense Detail
Oct 1993 - Sep 1994
(\$000)

	Oct	Nov	Dec	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Total
VP ops	6	6	6	6	6	6	6	6	6	6	6	6	72
Crew Cost	97	97	97	145	145	145	145	145	145	145	145	145	1600
Dipatch/Ops Person	9	9	9	9	9	9	9	9	9	9	9	9	113
Communication	2	2	2	2	2	2	2	2	2	2	2	2	24
Training	3	20	3	3	3	3	5	5	2	2	5	2	56
	-	-	-	-	-	-	-	-	-	-	-	-	-
Total Flt Ops	117	134	117	166	166	166	168	168	165	165	168	165	1864
Depreciation	34	34	47	60	60	60	60	60	60	60	60	60	656
Fuel	135	220	303	319	294	335	316	328	322	322	335	322	3550
Maintenance													
VP	6	6	6	6	6	6	6	6	6	6	6	6	72
Labor	15	15	15	21	21	21	21	21	21	21	21	21	234
Reserves	27	45	61	65	60	68	64	66	65	65	68	65	719
Parts	10	30	60	60	60	60	60	60	60	60	60	60	640
Overhead	15	15	15	15	15	15	15	15	15	15	15	15	180
	-	-	-	-	-	-	-	-	-	-	-	-	-
Total Maint	73	111	157	167	162	170	168	168	167	167	170	167	1845
Landing Fees	36	57	75	78	72	82	78	81	79	79	82	79	878
Ground Handling	108	173	225	236	218	247	234	243	238	238	247	238	2846
Insurance/Property Tax													
Hull	12	12	18	24	24	24	24	24	24	24	24	24	258
Liability	6	15	25	29	28	32	24	26	27	29	30	24	297
Property Tax	1	1	1	1	2	2	2	2	2	2	2	2	20
	-	-	-	-	-	-	-	-	-	-	-	-	-
Total	21	28	44	54	54	58	50	52	53	55	56	50	575
Reservations	32	56	87	99	99	112	83	91	92	100	104	85	1041
Advertising	50	50	50	50	50	50	50	50	50	50	50	50	600
Comms/C. Cards	21	42	76	93	93	106	78	86	87	94	98	80	955
Administration													
Personnel	30	30	32	32	32	32	32	32	32	32	32	32	378
Overhead-Rent	4	4	4	4	4	4	4	4	4	4	4	4	48
-Computer	5	5	5	5	5	5	5	5	5	5	5	5	60
-Telephone	3	3	3	3	3	3	3	3	3	3	3	3	36
-Insurance	1	1	1	1	1	1	1	1	1	1	1	1	12
-Other	15	15	15	15	15	15	15	15	15	15	15	15	180
	-	-	-	-	-	-	-	-	-	-	-	-	-
Total Admin	58	58	60	60	60	60	60	60	60	60	60	60	714
Total Expenses	685	963	1241	1381	1328	1445	1342	1387	1374	1391	1430	1357	15324

ValuJet

Summary Statistics 8 Cost Assumptions
Oct 1993 - Sep 1994

(\$000)

	Oct	Nov	Dec	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Total
Calculated Stats													
Monthly Departs	255	408	529	555	512	582	550	571	561	561	582	561	6226
Passengers	11466	20384	31752	36065	35851	49748	30238	33138	33634	36436	37838	39831	378380
Aircraft (000)	91	149	208	220	263	231	216	226	222	222	231	222	2442
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ASMs(000)	9643	16093	22467	23729	21994	24896	23513	24435	23974	23974	24896	23974	263699
Block Hours	286	459	631	664	813	697	658	684	671	671	697	671	7397
GallonsFuel(000)	224	367	505	531	491	558	527	547	537	537	558	537	5917
TotalAircraft	2	2	3	4	4	4	4	4	4	4	4	4	

Personnel													
Pilots	8	8	8	12	12	12	12	12	12	12	12	12	
Copilots	8	8	8	12	12	12	12	12	12	12	12	12	
Inflight	24	24	24	36	36	36	36	36	36	36	36	36	
Scheduling/Operatio	3	3	3	3	3	3	3	3	3	3	3	3	
Maintenance	5	5	5	7	7	7	7	7	7	7	7	7	
Res/Sales	15	20	30	30	30	30	30	30	30	30	30	30	
Admin	3	3	4	4	4	4	4	4	4	4	4	4	
Executive	2	2	2	2	2	2	2	2	2	2	2	2	
CEO/COO	2	2	2	2	2	2	2	2	2	2	2	2	

Cost Assumptions

Crews													
PIC			4										Avg Wage/Month for Pilot in Command
FO			2.5										Avg Wage/Month for Co-pilot
Inflight			1.2										Avg Wage/Month for Flight Attendant
Dispatch/Ops Personnel-\$2500/month			2.5										Licensed Dispatchers- do A/C Schedules, crew schedules/records
RON-\$300/night(1 a/c)			300										Estimated Overnight cost. Fii schedules do not have RONS
Depreciation			13.3										\$2M/Aircraft - 120 month life to 29% Residual = \$13.3K/mon/AC
Maintenance-Labor-\$2500/month			2.5										Avg Wage/Month for maintenance personnel
Reserves-Cost per Block Hour			97.2										Per contract, Maint reserves are \$121.50/ Flt Hour, or \$97.20/Blk Hr assuming 1.25 to 1 Blk Hours to Flt Hours.
Parts overhaul-\$30K/month/Aircraft			30										Parts and overhaul/repair of parts/month/aircraft-starts September
Overhead-\$1 SK/month			15										Monthly overhead, record keeping, freight and out statii support
Fuel-Gals/Hour			800										Fuel bum/Block hour of DC9-32
-Rate/Gal			0.6										Estimated average cost/gallon Including Into plane and taxes.
Landing Fees-\$141 per departure			141										Average landing fee of \$1.35/1000 lbs for 105,000 lb aircraft
Handling-\$400/turn			425										Ground services contracted. Amount includes all handling, interrupted trip, supervisory personnel, facilities rent and supplies.
Insurance													
Hull-\$3.5m*2.0%=\$6k/month			6										Hull value=\$3.5million; 2% of value /year or \$70,000; =\$6K/mon/ AC
Liability-\$2/1000RPMS			2										Liability rate estimated to be \$2/1000RPMS
Property Tax-\$1m*1%/12			1										Personal property tax cost per month per aircraft
Reservations-\$2.75/Pax			2.75										Reservations services purchased; current bids are from \$3.50 per passenger.
Advertising-Avg \$50K/month			50										Assume budget of \$50K /month avg.
Comms/Credit Card Fees-5% Rev			5										36% of sales by Travel Agents-cost is 3% of revenue; 2% rev for C. Cards

ValuJet

Revenue Assumptions - MCO/TPA/FLL

Oct 1993 - Sep 1994

(\$000)

	Oct	Nov	Dec	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Total
SCHEDULED SERVICE - Key Assumptions													
Markets	Mileage	Block Time											
MCO-ATL	403	1.25											
TPA-ATL	406	1.25											
FLL-ATL	582	1.87											
			DC9-32 Aircraft										
			Fuel Burn										
						108 Seats							
						800 Gallons/Hr							
Pax Revenue	163	459	841	951	945	1074	797	874	887	961	998	813	9782
Passengers/Trip	45	50	60	65	70	70	55	58	60	65	65	55	
Average Fare													
MCO/TPA	40	45	50	53	53	53	53	53	53	53	53	53	
FLL	55	60	65	68	68	68	68	68	68	68	68	68	
Daily RTrips(1)													
MCO	1	2	2	2	2	2	2	2	2	2	2	2	
TPA	1	2	2	2	2	2	2	2	2	2	2	2	
FLL			1	1	1	1	1	1	1	1	1	1	
Monthly Trips													
Days/Month(2)	26	26	27	26	24	27	25.5	26.5	26	26	27	26	
Comp Factor(%)	98	98	98	97	97	98	98	98	98	98	98	98	
Monthly Trips	102	204	265	252	233	265	250	260	255	255	265	255	2604
Calculated Statistics													
Passengers	4586	10192	15876	16393	16298	18522	13745	15063	15288	18562	17199	14014	173736
Aircraft Miles(000)	41	82	116	111	102	116	110	114	112	112	116	112	1247
RPMs(000)	1855	4123	6985	7213	7170	8150	6048	6628	6727	7287	7568	6186	75919
ASMs(000)	4462	6905	12574	11985	11063	12574	11875	12341	12108	12108	12574	12108	134666
Block Hours	127	255	353	336	311	353	333	346	340	340	353	340	3768
Load Factor(%)	41.7	46.3	55.6	60.2	64.8	64.8	60.9	53.7	55.6	86.2	60.2	50.9	58.4
Yield	9.9	11.1	12.0	13.2	13.2	13.2	13.2	13.2	13.2	13.2	13.2	13.2	12.9
Revenue/ASM	4.1	5.2	6.7	7.9	8.5	8.5	6.7	7.1	7.3	7.9	7.9	6.7	7.3
Gallons Fuel(000)	102	204	262	269	248	282	267	277	272	272	282	272	3030

(1) Service assumed to begin October 15, 1993 subject to DOT approval.

(2) Assumes schedule of 6 days per week of flying.

ValuJet

Revenue Assumptions - SDF/MEM/MSY
Oct 1993 - Sep 1994
(\$000)

Oct Nov Dec Jan Feb Mar Apr May Jun Jul Aug Sep Total

SCHEDULED SERVICE - Key Assumptions

Markets	Mileage	Block Time	DC9-32 Aircraft Fuel Burn	108 seats 800 Gallons/Hr									
SDF-ATL	321	1											
MEM-ATL	332	1											
MSY-ATL	425	1.25											
JAX-ATL	270	1											
Pax Revenue	241	377	660	918	913	1037	770	844	658	927	963	785	9310
Passengers/Trip	45	50	60	65	70	70	55	58	60	65	65	55	
Average Fare													
SDF/MEM/JAX	35	37	42	45	45	45	45	45	45	45	45	45	
MSY	40	40	47	50	50	50	50	50	50	50	50	50	
DailyRTrips(1)													
SDF	1	2	2	2	2	2	2	2	2	2	2	2	
MEM	1	1	1	1	1	1	1	1	1	1	1	1	
MSY			1	2	2	2	2	2	2	2	2	2	
JAX	1	1	1	1	1	1	1	1	1	1	1	1	
Monthly Trips													
Days/Month(2)	26	26	27	28	24	27	25.5	26.5	26	26	27	26	
Comp Factor(%)	98	98	98	97	97	98	98	98	98	98	98	98	
Monthly Trips	153	204	265	303	279	318	300	312	306	308	318	308	3061
Calculated Statistics													
Passengers	6860	10192	15878	19672	19555	22226	16493	18075	18346	19874	20639	16817	204845
Aircraft Miles(000)	50	67	92	109	100	114	108	112	110	110	114	110	1195
RPMs(000)	2246	3328	5498	7069	7027	7987	5927	6495	6592	7142	7416	6043	72767
ASMs(000)	5391	7168	9893	11745	10841	12322	11638	12094	11866	11866	12322	11866	129033
Block Hours	153	204	278	326	303	344	325	338	331	331	344	331	3609
Load Factor(%)	41.7	46.3	55.6	60.2	64.8	64.6	50.9	53.7	55.6	60.2	60.2	50.9	56.4
Y i i	10.7	11.3	12.4	13.0	13.0	13.0	13.0	13.0	13.0	13.0	13.0	13.0	12.8
Revenue/ASM	4.5	5.2	6.9	7.8	8.4	8.4	6.6	7.0	7.2	7.8	7.8	6.6	7.2
GallonsFuel(000)	122	163	222	262	242	275	260	270	265	265	275	265	2867

(1) Service assumed to begin October 15, 1993 subject to DOT approval.

(2) Assumes schedule of 6 days per week of flying.

ValuJet

Balance Sheet
For the Period Ended September **30, 1994**
(\$000)

Sep 30
1994

ASSETS

Cash	4970
Accounts Receivable	160
Inventory	75
Prepaid Expenses	255
Fixed Assets	8400
Less Accumulated Depr	876
Notes Payable-Shareholder	200
Deposits	450

Total Assets 13634

LIABILITIES AND STOCKHOLDER'S EQUITY

Accounts Payable	271
Air Traffic Liability	240

Total Liabilities 511

Long Term Debt 5770

Common Stock	6000
Retained Earnings	1353

Total Equity 7353

Total Liabilities and Stockholder's Equity 13634

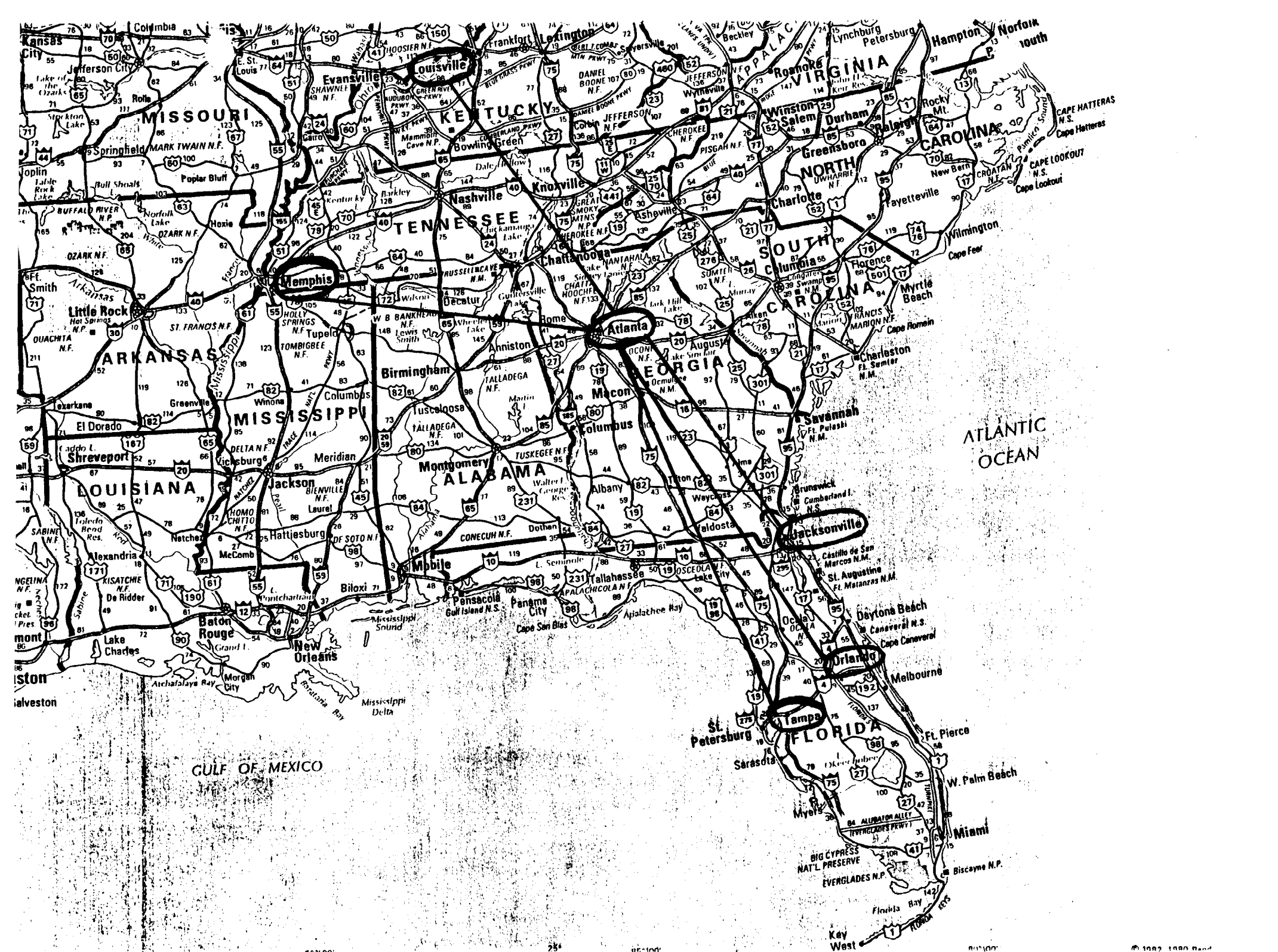


EXHIBIT B

LETTER FROM SHAREHOLDERS TO COMPANY

VALUJET AIRLINES, INC.

1800 PHOENIX BLVD. SUITE 126, ATLANTA, GA 30349

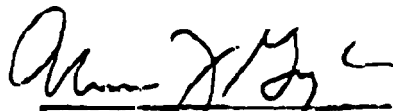
August 19, 1993

Board of Directors
ValuJet Airlines, Inc.
1600 Phoenix Blvd., Suite 126
Atlanta, GA 30349

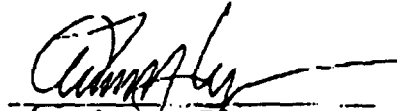
Gentlemen:

This is to confirm our commitment to ValuJet Airlines, Inc. (the "Company") to contribute up to \$3,000,000 as may be required by the Company to cover its start-up expenses or operating and maintenance costs. This amount may be contributed as either debt or equity, and shall be made on a pro rata basis among the undersigned in accordance with their ownership interest in the Company. This commitment shall automatically terminate upon the arrival of (i) receipt by the Company of \$3,000,000 or more of either debt or equity financing; or (ii) 12 months from the anniversary of the Company's initiation of air transportation services.

Sincerely yours,


Maurice J. Gallagher


Robert L. Priddy


Timothy P. Flynn


Lewis H. Jordan

END

EXHIBIT C

RESUMES OF RICHARD E. TIDWELL AND DAVID L. GENTRY

RICHARD E. TIDWELL
1869 RUGBY AVENUE
COLLEGE PARK, GEORGIA
TELEPHONE: (404) 766-6579

Experience

1/85-Present

Semi-Retired
Consultant to Delta Airlines as:

1. L- 10 11 Simulator Instructor
2. Interviewer for prospective pilot employment
3. Technical Advisor for **film** regarding Delta's L-1 011 crash at DFW
4. Head program for Test-hop/Ferry. Program was abandoned prior to completion

1/56-1/85

DELTA AIRLINES, INC.
Pilot

Other Duties included:

Flight Engineer

First Officer

Captain

Pilot Instructor

Check Pilot

Line Check Pilot

Assistant Chief Pilot

Captain and Line Check Pilot on L-101 1 equipment for both domestic and international operations

Ratings

Airline Transport Pilot Certificate #3 5 59 12

with ratings including:

cw-46

DC-6, DC-7, **DC-8**, DC-9, DC-10

CV-240, CV-340, CV-440, CV-880, CV-990

B-727

L-101 1

Flight Time: 29,000 Hours

Education

1/53-1/56

University of Georgia
BBA degree

Military

2/43-12/45

First tour active duty

1/51-1/53

Second tour active duty

United States Air Force
Pilot
Instructor Pilot
Budget and Accounting Officer
Retired from USAF Reserves

Personal

Date of Birth:	December 27, 1924
Marital Status:	Married - four children
Health:	Excellent

DAVID L. GENTRY

4453 Gregory Rd.
Decatur, GA 30035
(404) 288-0166

Experienced manager with effective communication skills to provide direction, continuous improvement **leadership**, and goal **setting** in the changing airline industry.

Professional Experience:

1986 - Present Northwest Airlines, Inc.

Hanger Systems Crew Chief

- Supervise/Perform C-check operations
DC-9-10/30/40/50 & MD-30 aircraft

Training Coordinator

- Developed Training needs
- Procure Training
- Instructing

Manager/Support Shops

- Planning & Budgeting Control
- Promote Continuous Improvement
- Provide Resources & Direction in
Attaining Goals

1976 - 1986 SOUTHERN AIRWAYS & REPUBLIC AIRLINES

Section Manager & St. Foreman/Metal Finishing Shop

- Supervision/Planning/Coordination of Work Activity
- Ensuring Maximum Efficiency, Safety, and Production
- Goal Setting
- Vendor Evaluation

1974 - 1976 **Lead Mechanic/Metal Finishing**
• Supervise engine overhaul & repair
on M-404 and DC-9 aircraft
• Oversee Shop Functions

1966 - 1974 **Mechanic/Welding**
• Welding duties DC-3/M-404/DC-9

1961 - 1966 U.S. MARINE CORPS

Tactical Support Launch & Recovery

- Overhaul/Repair J-87 engine catapult

EDUCATION & PROFESSIONAL DEVELOPMENT

- Airframe & Powerplant License # 260606474
- DeKalb College - Associates Degree in Business Administration
- Aerospace Metal Finishing & Machining - U.S. Marine Corps
- Dale Carnegie Institute for Effective Speaking & Human Relations
- Quality by Design - Lawrence Miller
- Principles for Centered Leadership - Stephen Covey
- Achieving Competitive Excellence (ACE)
- Quality Improvement Process Management
- Continuous Improvement Leadership - Mike Midas
- Quality Enhancement - Dr. Edward Deming

REFERENCES AVAILABLE UPON REQUEST

EXHIBIT D

FAA ENFORCEMENT HISTORY

FAA ENFORCEMENT ACTIONS

The following is a description regarding FAA actions against three relevant corporations in which Messrs. Flynn, Gallagher and Priddy held substantial interests (**WestAir** Commuter Airlines, NPA, Inc. and Atlantic Southeast Airlines). All actions against those companies have been resolved and closed, with one exception of a 1987 **WestAir** case which appears to be inactive.

Mr. Priddy has not received access to Atlantic Southeast Airlines' litigation files; however, attached is a FAA printout of actions against Atlantic Southeast during the period which Mr. Priddy was employed by that carrier. All such items have been closed.

VIA FEDERAL-EXPRESS

CONFIDENTIAL

August 8, 1991

Thomas K. McGowan, Esq.
Curtis Coward, Esq.
McGuire, Woods, Battle & Booth
P. O. Box 9346
McLean, Virginia 22102

Re: Atlantic **Coast** Airlines Information Request

Dear Tom and Curt:

In response to **Daryl Gault's** request and our telephone conversations **of** Friday, August 2 and **Tuesday, August 6, 1991**, I have attached a compilation of FAA enforcement actions initiated **against WestAir** and its employees for the period commencing April, 1987 and continuing up through the present. A review of FAA files **reveals** that there have been some enforcement actions prior to April, 1987. However, these prior actions were not handled by this office. Accordingly, without pulling each **of** these prior cases from **FAA** archives, it will be impossible to ascertain their alleged subject matters or the circumstances under which they **were** settled. However, suffice it to say that prior to December 30, 1987, the effective date of Public Law 100-223, all **civil** penalty cases settled were done so by means of offers in compromise without any findings of violation. Accordingly, I believe that it would be safe to presume that no findings of violation were made in any of these prior cases.

ACTIONS AGAINST ATLANTIC COAST AIRLINES

To my knowledge, there have been no FAA cases initiated against Atlantic Coast Airlines, nor are there any which are pending initiation. This office's only involvement with cases in any way associating Atlantic Coast Airlines are confined to two cases specifically identified in Attachment A, Section II (Actions Against **WestAir** Associates), and specifically identified as files numbers **9006MHA0420** and **9006RSP0421**. In those cases, the FAA's action was confined to Atlantic Coast Airlines employees and not the company. Be that as it may, we successfully defended these employees and the FAA withdrew the enforcement actions and closed their files.

Thomas K. McGowan, Esq.
Curtis Coward, Esq.
August 8, 1991
Page Two

ACTIONS AGAINST **WESTAIR** HOLDING CARRIERS,
WESTAIR COMMUTER AIRLINES, INC. AND NPA

Attachment **A** is a compilation **of** all FAA/We&Air cases for the period April, 1987 through the present time. This compilation is broken down into the following categories:

I. Actions Against **Company**

- A. Maintenance/Operations
- B. Airports/Security

II. Actions Against **WestAir Associates**

- A. Maintenance/Operations
- B. Airports/Security

This compilation is confined to those cases in which the FAA has initiated **legal** enforcement action (i.e., either civil penalties or certificate actions) and does not include administrative actions such as letters of correction, warnings of reprimands. Likewise, it does not include those matters in which the FAA has merely issued letters of investigation, regardless of whether those matters may have been closed by the FAA or whether they currently remain open. This compilation includes **WestAir** Commuter Airlines, NPA and Atlantic Coast Airlines. To my knowledge, there are two cases in which letters of investigation have recently been issued and which will probably result in the initiation of some legal enforcement action by the FAA. These cases are listed on Attachment **B**.

As can be seen from Attachment A, in only one instance has the FAA made a finding of violation (FAA Case No. **88WP750226**, our file no. **8905UEX0358**), a "failure to **detect**" security case more specifically referenced in paragraph I. B. page 5 of Attachment A. This involved a failure to detect a hand grenade test object by a contract security screener at **Redding**, California. The FAA had sought imposition of a \$1,000 civil penalty and agreed to accept \$675 in settlement. The FAA would not, however, agree to accept **an** offer in compromise without a finding of violation. As you may know, this is fairly consistent with the **FAA's system-**wide policy in effect at that time -- i.e., that civil penalties would be assessed with findings of violation being made. It was not until the repromulgation of the **FAA's** Civil Penalty Rules in August, 1990, that the FAA agreed to entertain compromise offers on a **case-by-case basis**. In agreeing to settle this matter, **WestAir** made an economic decision. The civil penalty sought, as well as the amount at which this case was settled, were relatively low in relation to the costs, expenses and uncertainties that would be entailed in fully litigating this matter. Notwithstanding the **FAA's** finding of violation, **WestAir** tendered the

Thomas **K.** McGowan, Esq.
Curtis Coward, Esq.
August 8, 1991
Page Three

civil penalty without admitting any liability, wrongdoing or violation on its part.

Other than this **Redding** case, all other actions against the company were either closed by means of **WestAir's** tender of an offer in compromise with no admission of liability, **wrongdoing or violation** and without the **FAA's** making any finding of violation, or by means of the FAA's outright withdrawal of the enforcement action.

You will also note that there **are** a number of cases which **are** currently pending. No findings of violation have been made in these pending cases. At this point, the violations are merely allegations made by the FM.

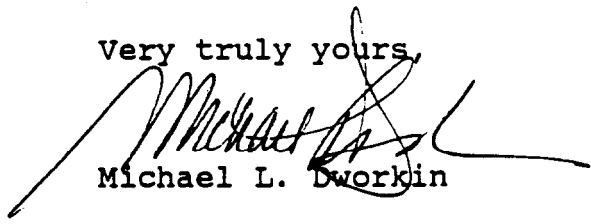
I have also enclosed as Attachment C a copy of an FM internal document entitled "Enforcement Report Data For **WestAir** Commuter Airlines". This report data covers the period from January 1, 1984 through August 1, 1990, and includes administrative actions as well as legal actions. The available response time to your inquiry did not permit me sufficient time to obtain an update on this document covering matters arising after August 1, 1990, or covering NPA (which, until very recently, was **operating** under a different air carrier operating certificate). **However,** it **is** my understanding that from August 1, 1990 through the present time, I was handling all FM matters for **WestAir** and NPA. With this understanding, I would assume that if there were any other cases that had been initiated or were under **investigation**, they would have come to my attention.

I have taken the liberty of sending a copy of this letter and the attached to Daryl Gault.

Should you have any questions concerning the foregoing or the attached, please do not hesitate to contact me.

With best regards.

Very truly yours,



Michael L. Dworkin

MLD:mlc

Enclosures

cc: Daryl Gault, Esq.

Attachment A

COMPILATION OF FAA LEGAL ACTIONS AGAINST WESTAIR AND ITS
ASSOCIATES -- 1987 THROUGH PRESENT

I. Actions Against Company

A. Maintenance/Operations

FM Case No. 87WP040002/Our File No. 8707UEX0241

Alleged subject Matter: Alleged noncompliance With **Non-Destructive Testing** time limits and overhaul time limits for **EMB-110** main and nose wheels and failure to record NDT inspections in aircraft maintenance records.

FARs Alleged: 43.9, 91.9(a), 91.167(a)(2), 135.5 and 135.21(a).

FAA Proposed Action: \$63,060.00 civil penalty.

Final Action: Settled by payment of \$31,530.00 offer in compromise.

Finding of Violation: None.

Status: Closed 2/16/88.

NAA Case. 87WP040061/Our File No. 8801UEX0278

Alleged Subject Matter: Entry in EMB 110-P1 maintenance records indicating completion of installation of de-icing system when, in fact, it had not. The plumbing had not been installed for the inboard de-icing boots. The inoperative de-icing boots had neither been deferred nor placarded.

FARs Alleged: 135.413(a)

FAA Proposed Action: \$1,000 civil penalty.

Final Action: Settled by payment of \$1,000 offer in compromise.

Finding of Violation: None.

Status: Closed 6/3/88.

FAA Case No. 87WP140096/Our File No. 8806UEX0297

Alleged Subject Matter: Operation of SD-360 on flight from San Francisco to Sacramento when flight attendant was unfamiliar with the use of **Halon** fire extinguishers on board the aircraft and when **WestAir's** Flight Attendant Manual did not contain current information on **Halon** fire extinguishers.

FARs Alleged: 121.135(a)(1)

FAA Proposed Action: \$2,000 civil penalty.

Final Action: Settled by payment of \$1,000 offer in Compromise.

Finding of Violation: None.

Status: Closed 10/21/88

FAA Case No. 88WP170014/Our File No. 8811UEX0320

Alleged Subject Matter: Improper repair to BAe 146 fuel manifold assemblies (failure to install o-rings on fuel nozzles). Aircraft was operated on three flights and experienced a fire warning indication on the third flight necessitating discontinuation of the flight and return to SFO.

FARs Alleged: 43.13(a) and (b), 91.29(a), 121.153(a)(2)

FAA Proposed Action: \$6,250 civil penalty.

Final Action: Settled by payment of \$6,250 offer in compromise.

Finding of Violation: None.

Status: Closed 1/15/91.

FAA Case No. 89WP170002/Our File No. 8902UEX0331

Alleged Subject Matter: Operation of SD3-60 with improperly secured left outboard aileron shroud assembly necessitating an emergency landing at FAT.

FARs Alleged: 43.13(a), 121.153(a)(2)

FAA Proposed Action: \$10,000 civil penalty.

Final Action: Settled by payment of \$10,000 offer in compromise

Finding of Violation: None.

Status: Closed 1/15/91.

FAA Case No. 90WP050062/Our File No. 9101UEX0444

Alleged Subject Matter: Improper grounding of aircraft during refueling at LGB.

FARs Alleged: 135.21(a)

FAA Proposed Action: \$1,000 civil penalty.

Final Action: On March 22, 1991, the FAA withdrew and closed this case without action.

Finding of Violation: None

status: Closed 3/22/91

FM Case No. 91WP170032/Our File No. 9105UEX0461

Alleged Subject Matter: Discrepancies in pilot records.

FARs Alleged: 135.299(b), 135.323(c) and 135.341

FM Proposed Action: \$10,000 civil penalty.

Final Action: Pending

Finding of Violation: N/A

Status: Pending

FAA Cases Nos. 91NM090004, 005 and 006/Our File No. 9101UEX0447

Alleged Subject Matter: Runway incursions at PDX while aircraft were being taxied by maintenance personnel.

FARs Alleged: 91.129(h) and 91.13(b)

FAA Proposed Action: \$4,000 civil penalty.

Final Action: Pending

Finding of Violation: N/A

Status: Pending

B. Airports/Security Cases

FAA Case No. 85WP750155/Our File No. 8801UEX0278

Alleged Subject Matter: Unauthorized access to sterile area at carrier-shared security checkpoint at SFO by contract security screener.

FARs Alleged: 108.5(a)(1) and 109(a)

FAA Proposed Action: \$1,000 civil penalty.

Final Action: Settled by payment of \$500 offer in compromise.

Finding of Violation: None.

Status: Closed 5/12/88

Alleged Subject Matter: Baggage tag container at **SFO** Gate 78 was left unsecured and unattended. Additionally, keys in the alarm on/off switch located adjacent to the Airport Operations Area access door were left unattended. .

FARs Alleged: 108.5(a)(2)

FAA Proposed Action: \$2,000 civil penalty.

Final **Action:** Settled by payment of \$2,000 offer in compromise.

Finding of Violation: None.

Status: closed 5/12/88.

FM Case No. 87WP750014/Our File No. 8801UEX0278

Alleged Subject Matter: **MRY** contract security screener commenced screening passengers without conducting a required inspection or search of the hold room beyond the carrier-shared screening point. The contract screener also conducted an improper operational test of the metal detector after that device had been left unattended for a period of time. The contract security service also failed to maintain the screener's training records in a complete, current and accurate manner.

FARs Alleged: 108.5(a)(1)

FAA Proposed **Action:** \$8,000 civil penalty

Final Action: Settled by payment of \$6,000 offer in compromise.

Finding of Violation: None.

Status: Closed 5/12/88.

FAA Case No. 88WP750070/Our File No. 8810UEX0312

Alleged Subject Matter: ACV screeners discovered a loaded handgun in a ticketed passenger's handbag during the x-ray screening process. The FAA alleged that **WestAir** failed to notify local law enforcement authorities and failed to identify the passenger. **WestAir** allowed the passenger to unload the weapon and check it as baggage. The FM alleged that **WestAir** had failed to follow the requirements of its ACSSP.

FARs Alleged: 108.5(a) (1)

FAA **Proposed Action:** \$10,000 civil penalty.

Final **Action:** The FAA withdrew enforcement action and closed file.

Finding of Violation: None.

status: Closed 9/14/89.

88WP750226/Our File No. 8905UEX0358

Alleged Subject Matter: Failure to detect hand grenade test object by contract security screener at RDD.

FARs Alleged: 108.5(a)(1, 108.5(b) and 108.9(a)

FAA Proposed Action: \$1,000 civil penalty.

Final Action: Settled by payment of \$675 civil penalty.

Finding of Violation: Yes.

Status: Closed 11/5/89.

FM Case No. 88WP750136/Our File No. 8902UEX0338

Alleged Subject Matter: Unbadged individual observed unloading refreshment supplies from a delivery truck in the AOA at FAT east of Gate 6.

FARs Alleged: 108.5(a)(1)

FM Proposed Action: \$7,500 civil penalty.

Final Action: Pending

Finding of Violation: N/A

Status: Pending: informal conference held 9/12/89.

FAA Case No. 89WP750067/Our File No. 8905UEX0359

Alleged Subject Matter: Unattended aircraft at CIC and unauthorized access to aircraft: failure to challenge unbadged individual.

FARs Alleged: 108.13(a)

FAA Proposed Action: \$7,500 civil penalty.

Final Action: Pending

Finding of Violation: N/A

Status: FAA complaint filed May 2, 1991 seeking \$7,500 civil penalty. **WestAir** has requested a hearing. Hearing will be scheduled after November 1, 1991.

FAA Case No. 89WP750135/Our File No. 9001UEX0399

Alleged Subject Matter: SMF-contract security screener failed to detect FM hand grenade test object at carrier-shared security checkpoint.

FARs Alleged: 108.5(a) (2)

FAA Proposed Action: \$1,000 civil penalty.

Final Action: Pending

Finding of Violation: N/A

Status: FAA complaint filed May 1, 1991 seeking \$1,000 civil penalty. **WestAir** has requested a hearing.

FAA Case No. 89WP710151/Our File No. 8906UEX0363

Alleged Subject Matter: Unattended passenger gate door at SAN; unbadged individual gains access into AOA through open gate door and remains on AOA for several minutes before being challenged. Gate door security the responsibility of United Airlines.

FARs Alleged: 108.5(b)

FAA Proposed Action: \$7,500 civil penalty.

Final Action: Pending

Finding of Violation: N/A

Status: FAA Second Amended Complaint filed July 25, 1991, seeking \$7,500 civil penalty. **WestAir** has requested a hearing.

FM Case No. 90WP750021/Our File No. 9002UEX0405

Alleged Subject Matter: Failure to detect an FAA-approved hand grenade test object at MOD.

FARs Alleged: 108.5(a)(2)

FM Proposed Action: \$1,000 civil penalty.

Final Action: Settled by payment of \$1,000 **offer** in compromise.

Finding of Violation: None.

Status: Closed 05/02/91

FAA Case No. 89NM710056/Our File No. 9011NPA0436

Alleged Subject Matter: Passenger access into Pasco Airport sterile area with .45 caliber semi-automatic pistol.

FARS Alleged: 108.5(a)(1)

FAA Proposed Action: \$7,500 civil penalty.

Final Action: Settled by **payment** of \$5,000 offer in compromise.

Finding of Violation: None.

Status: Closed 01/08/91

~~89MM710418/Our File No. 9011NPA0436~~

Alleged Subject Matter: Failure to challenge unbadged person at SEA

FARS Alleged: 108.5(a)(1)

FM Proposed Action: \$4,000 civil penalty.

Final Action: Settled by **payment** of \$1,500 offer in compromise.

Finding of Violation: None.

Status: Closed 03/29/91

FAA Case No. 90WP710414/Our File No. 9012UEX0437

Alleged Subject Matter: Failure to detect a hand grenade test object at OXR. The **WestAir** screener indicated that the test **object looked** like a perfume bottle **as** it passed through the x-ray device.

FARS Alleged: 108.9(a)

FM Proposed Action: \$1,000 civil penalty.

Final Action: Pending

Finding of Violation: N/A

Status: Pending

FAA Case No. 90WP710446/Our File No. 9101UEX0443 ((ANA I))

Alleged Subject Matter: Failure to detect **opaque** rectangle test object at carrier-shared security checkpoint by security screening contractor at ANA.

FARS Alleged: 108.5(b)

FM Proposed Action: \$1,428.00 civil penalty.

Final Action: Pending

Finding of Violation: **N/A**

status: Pending

FAA Case No. 89WP7510056/Our File No. 8906UEX0360

Alleged Subject Matter: Carrier-shared security **contractor's** alleged failure to maintain current and accurate training records for checkpoint security employees, failure to **maintain minimum** employment standards and training for checkpoint **security supervisors**, and failure to update training for and provide periodic retesting of checkpoint security supervisors at **SMF**.

FARS Alleged: 108.5(a) (1)

FM Proposed Action: \$24,000 civil penalties each against **WestAir** and other SIG-based carriers.

Final Action: Pending

Finding of Violation: **N/A**

Status': Pending

FAA Case No. 90WP750082/Our File No. 9103UEX0452

Alleged Subject Matter: Aircraft left unattended and unlocked in the AOA at **RNO** and that and FM Special Agent, not wearing any visible approved identification, gained access to the aircraft without challenge. Access to AOA controlled by United Airlines.

FARS Alleged: 108.5(a)(1)

FM Proposed Action: \$7,500 civil penalty.

Final Action: Pending

Finding of Violation: **N/A**

Status: Pending; informal conference held **8/1/91**.

FAA Case No. 90WP750048/Our File No. 9103UEX0453

Alleged Subject Matter: United Airlines' failure to provide a qualified Ground Security Coordinator on duty for operations at **MRY**.

FARS Alleged: 108.10(a)(1) and 108.10(b)

FM Proposed Action: \$7,500 civil penalty:

Final Action: Pending

Finding of Violation: **N/A**

Status: Pending; informal conference held 8/1/91.

FAA Case No. 89WP750179/Our File No. 9107UEX0465

Alleged Subject Matter: Failure to-detect dynamite bomb test object by security screener at RDD.

FARs Alleged: 108.5(a)(3)

FAA Proposed Action: \$2,000 civil penalty.

Final Action: Pending

Finding of Violation: N/A

Status: Pending

90WP750067/Our File No. 9107UEX0466 (SMF III)

Alleged Subject Matter: Failure to detect dynamite bomb test object by carrier-shared security screening contractor at SMF.

FARs Alleged: 108.5(a)(3)

FM Proposed Action: \$10,000 civil penalty.

Final Action: Pending

Finding of Violation: N/A

Status: Pending

FM Case No 90WP710346/Our File No 9107UEX0467 (ANA II)

Alleged Subject Matter: Failure to detect encapsulated weapon test object by carrier-shared security screening contractor at ANA.

FARs Alleged: 108.9(a)

FM Proposed Action: \$142.85 civil penalty.

Final Action: Pending

Finding of Violation: N/A

Status: Pending

II. Actions Against WestAir Associates

A. Maintenance/Operations

During this reporting period, this office has represented seventeen **WestAir** flight crewmembers and six **WestAir** mechanics in defending FM enforcement actions. In the interests of brevity, these cases are not reported individually. Rather, report is confined to the most significant matters. In the interests of each associate's **privacy**, the reports that are listed are simply identified by this **office's** file number.

1. Flight Crewmember Cases

8706MBA0236. The FM proposed suspension of this airman's airline transport pilot ("**ATP**") certificate for a period of 30 days when the **EMB 110**, of which he was in command, taxied into a battery cart at SFO. The aircraft began moving when the flight crew called for the chocks to be removed at the same time external power was being disconnected. The crew continued **performing** its "**Before Taxi Check**" checklist, apparently not realizing that the aircraft was moving. No suspension was imposed by virtue of the airman's having filed a timely NASA ASRS **report**.

8704ETF0223. The FM had proposed suspending this **airman's** ATP certificate for a period of 30 days by reason of his landing on the wrong runway at SFO. Specifically, the aircraft was issued ATC instructions to intercept the runway 28 R **localizer** and was subsequently instructed to land on 28 L. The crew landed on runway 28 R. The case was subsequently settled for a \$300 civil penalty offer in compromise without finding of violation.

8705UEX0231. This airman's ATP certificate was suspended for a period of 60 days by reason of his incursion into the San Diego TCA without an appropriate ATC clearance. The aircraft was **en-route** from LAX to SAN under instrument flight rules. **In** the interests of affording his passengers a more comfortable flight; the airman requested ATC for another altitude to avoid cumulus buildups which appeared ahead. ATC was unable to reassign the aircraft to another altitude. The airman accordingly canceled his IFR clearance and conducted the remainder of the flight under visual flight rules, remaining in contact with ATC for purposes of obtaining radar advisories. However, he failed to obtain the required ATC clearance to enter the **TCA**. At the time that this case was pending, a 60 day suspension was the mandatory sanction imposed by the FM for unauthorized TCA incursions.

8802MDL0280 and 8803RSM0285. The FM proposed to suspend the ATP certificates of the captain and first officer of an **SD3-60** on an STS-SFO flight. The crew started the engines on this aircraft when the propeller chocks were still in place in the right aircraft engine. The engine start caused damage to the right engine de-icer bracket and the engine nacelle. Although the **crew-**members shut down the engine and visually inspected it, they

neglected to have **the** right engine properly inspected for damage by qualified **maintenance** personnel. **They restarted** the engines and **operated** the aircraft to SFO. The originally proposed 30 day suspensions were not imposed by reason both crewmembers having filed timely NASA **ASRS** reports.

8710MND0255 and 8802JAM0279. The FM proposed suspension of the ATP certificates of both the captain and first officer on an **MCE-FAT** flight for alleged noncompliance with an ATC clearance. The clearance included a left turn after takeoff to a heading of 140 degrees. However, after takeoff, the aircraft executed a right turn. **Apparently,** an **ATC** conflict was created and ATC had to issue vectors to an Air Force **XC-135** in order to provide sufficient separation. The FM subsequently withdrew its action against the captain inasmuch as he was not in communication with ATC **when the clearance was received.** With respect to the first officer, the FAA eventually settled this matter **and reduced the** period of **suspension** to 15 days.

8810PBL0314 and 8902ACS0336. The FM proposed suspensions of the pilot certificates of a captain and first officer of an EMB 120 which had deviated from an **ATC** clearance to climb to and maintain 10,000 feet while **enroute** from **LGB** to **SMF**. Although the crew acknowledged the 10,000 clearance, the aircraft proceeded to climb to 11,000 feet. The FM subsequently withdrew the action against the first officer and settled the captain's case by means of a **civil** penalty offer in compromise in the amount of \$500 **with no** finding of violation.

8803MEA0287. The FM had proposed suspension of this first officer's pilot certificate for a period of 30 days for landing **at** the wrong airport, i.e., **SMX** as opposed to **SBP**. The two airports are approximately 26 miles apart. The **FM** subsequently agreed to reduce the suspension to 15 days. Nonetheless, we appealed to the National Transportation Safety Board, arguing that all navigation and communication responsibilities were being performed by **the** captain and that the first officer, as the flying pilot, was merely complying with instructions that the captain was relaying to him. The NTSB Administrative Law Judge agreed with our position and dismissed the **FAA's** enforcement action. The FM has appealed this matter to the full NTSB and we are currently awaiting a decision.

8712SRF0266. The **FM** proposed to suspend an **SD3-60** captain's ATP certificate for a period of 30 days by reason of his aircraft's collision with parked aircraft at **SMF**. He was working as a training captain on a training flight. Through no fault of his **own,** or of any other crewmembers, the aircraft experienced a hydraulic system failure resulting in a loss of steering and brakes. Upon landing at **SMF,** rather than remaining on the **runway** and impeding **runway** utilization, the captain elected to taxi to the parking area. According to **WestAir's SD3-60** training materials, the emergency hydraulic accumulator will permit eight to ten brake applications even after a hydraulic system failure. As the aircraft taxied to the ramp, the captain counted **all** brake

applications. Unfortunately, **after only** five or six brake applications, the accumulator ran out of pressure. The aircraft was unable to **stop**, hit two aircraft and came to rest in the airport perimeter fence. We **appealed the FAA's** enforcement action to the **NTSB**. The **NTSB's** Administrative Law Judge concluded that the captain had reasonably relied upon the training materials and information given to him by the company and dismissed the **FAA's** enforcement action. The FAA has appealed that decision to the full NTSB and we are awaiting the Board's decision.

8903PMK0341 and 8903IMO0344. The FM has brought these cases against the captain and first officer of an **EMB-110** on a night-time departure from SFO. **ATC** had cleared the aircraft to taxi to and depart from runway 01 R. At the time that the aircraft initiated its takeoff roll, it was not on runway 01 R but rather on **taxiway L** which is to the right of and parallel to runway 01 R. After rolling just a few feet and prior to the aircraft achieving flying speed, the crewmembers realized their mistake and terminated the takeoff. **ATC** subsequently canceled the takeoff clearance. The FM has proposed suspension of both **crewmember's** pilot certificates for 30 days each. We appealed the FAA actions to the NTSB. The first officer's case has been held in abeyance pending resolution of the captain's case. At trial before the NTSB Administrative Law Judge in the captain's **case, WestAir** management conceded that the captain and first officer should not have been paired together as both crewmembers were relatively inexperienced and were not familiar with SFO. Additionally, there was substantial construction activity in the vicinity of the runway **01** complex which caused the crewmembers to become disoriented. At the conclusion of the hearing, the Administrative **Law** Judge concluded that the FM had nonetheless established violations of pertinent **FARs**, but imposed no suspension by reason of the captain's having filed a timely NASA ASRS report. We have appealed the Judge's Initial Decision and Order to the extent that findings of violation have been made. We are currently awaiting disposition of this matter by the full Board.

2. Maintenance Cases

8901HTW0326. This case is an outgrowth of the **BAe** 146 engine fire indication case (see FM file no. **88WP170014/our** file no. **8811UEX0320** above). In addition to the **FAA's** enforcement action against the company, the FM initiated an enforcement action * against the mechanic who failed to install o-rings in the fuel manifold. Inasmuch as the mechanic had timely filed a NASA ASRS report, no suspension was imposed.

8912LRG0394. The FM has proposed a suspension of this associate's mechanic certificate for a period of 12 days for his alleged accomplishment of an **"A"** check inspection on an **EMB 110** at SFO. Included in the **"A"** check inspection was the requirement that the oil reservoir cap be secured. Approximately one-half hour after the accomplishment of the **"A"** check, the aircraft departed, Only to return to **SFO** for a precautionary landing caused by oil pressure fluctuation in the right engine. This

matter has been settled by *means* of an offer in compromise in the amount of \$200, without finding of violation.

9008CS00429. The FAA has proposed to suspend this associate's mechanic **certificate** for a period of 30 days by reason of his failure to secure a full flow chip detector on the **#1** engine of a **BAe 146**. The aircraft departed **RNO** for **SFO** and while **enroute**, the **#1** engine indicated low oil pressure necessitating an **in-flight** shutdown. Upon arrival at **SFO**, the full flow chip detector was found dangling from its locking cable. The FM subsequently withdrew the charges against this associate.

9006MHA0420 and 9006RSP0421. The FM has proposed suspensions of these mechanics' certificates for period of 30 days each, alleging that they performed a service check on an EMB-120 and failed to inspect and ensure the security of the **#2** engine outboard cowling. Upon departure, the forward outboard cowling door came open in flight necessitating a precautionary landing. The FM subsequently withdrew these enforcement actions.

9102YVU0451. The FM has proposed to suspend this associate's mechanic certificate for a period of 30 days by reason of his failure to secure a full flow chip detector on the **#3** engine of a **BAe 146**. The aircraft departed **SFO** for ANA and shortly after takeoff, the **#3** engine indicated low oil pressure necessitating an in-flight shutdown and return of the aircraft to **SFO**. Upon arrival at **SFO**, the full flow chip detector probewas found hanging from the **lockclip** and cable. This matter remains pending.

B. **Airports/Security**

None.

Attachment B

Recent Letters of Investigation Likely to Result
in The Initiation of FAA Legal Enforcement Action

1. Airport Security Cases.

- a. Case No. **91WP710164/Our File No. 9107UEX0463.**

Alleged Subject Matter: Failure to detect dynamite bomb test object by carrier-shared security screening **contractor** at **SMX**.

2. Potential Actions Against **WestAir** and/or **WestAir Associates**.

a. **9104BRH0454.** The **FAA** issued a letter of investigation to this associate concerning an incident involving a **Bae** Jetstream 3201 aircraft which experienced an aborted takeoff at Yakima, Washington. The **cause of** the abort was alleged improper installation of the right main landing gear wheel assembly, causing the right **main landing** gear brake to lock up *and* resulting in a deflated tire. We responded to the letter of investigation and the matter was subsequently closed without action upon the **FAA's** determination that no violation had occurred.

b. **9109WSB0476.** The FAA issued a letter of investigation to this **ACA** associate concerning the installation of a main landing gear wheel, assembly on a J-3201 aircraft. The **matter** remains pending. It is presently unknown whether the FAA **will** make the same disposition of this case as it did in **9104BRH0454.**

Attachment

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07/17/1984 WESTAIR COMMUTER AIRLINES AIR TAXI OTHER ADMIN ACTION 0 LTR CORRECTION 09/24/1984 CLOSED
05NP 120041 AIR TAXI OPR 135.95B

01/25/1985 WESTAIR COMMUTER AIRLINES AIR CARRIER CP FA ACT 2000 DOLLARS 10/15/1986
05NP 120024 SKED AIR CARRIER 043.13A
043.13B

03/06/1985 WESTAIR COMMUTER AIRLINES AIR CARRIER CP FA ACT 3000 DOLLARS 10/15/1986 CLOSED
05NP 140036 SKED AIR CARRIER 121.3A
121.153 A2
121.709A1

03/05/1985 WESTAIR COMMUTER AIRLINES AIR TAXI COMUTR ADMIN ACTION 0 LTR CORRECTION 06/18/1985 CLOSED
05NP 140077 AIR TAXI OPR 043.13A
043.9A
043.9B
135.439A1

05/19/1985 WESTAIR COMMUTER AIRLINES AIR CARRIER ADMIN ACTION 0 LTR CORRECTION 07/08/1985 CLOSED
05NP 140071 SKED AIR CARRIER 121.75A

12/22/1984 WESTAIR COMMUTER AIRLINES AIR TAXI COMUTR CP FA ACT 500 DOLLARS 07/24/1986 CLOSED
05NP 750019 AIR TAXI OPR 108.5A2

11/27/1985 WESTAIR COMMUTER AIRLINES AIR TAXI COMUTR ADMIN ACTION 0 WARNING NOTICE 12/10/1985 CLOSED
05NP 750147 AIR TAXI OPR 108.9A
108.13A

12/03/1985 WESTAIR COMMUTER AIRLINES AIR TAXI COMUTR CP FA ACT 500 DOLLARS 05/18/1988 CLOSED
05NP 750155 AIR TAXI OPR 108.5A1
108.9A

09/26/1986 WESTAIR COMMUTER AIRLINES AIR CARRIER ADMIN ACTION 0 LTR CORRECTION 11/26/1986 CLOSED
05NP 140102 SKED AIR CARRIER 121.371A
121.375
121.371D
121.709B3

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REPORT NUM EMPLOYEE OR RESPONSIBLE AC CERT TYPE

10/23/1986 WESTAIR COMMUTER AIRLINES AIR CARRIER CP FA ACT 1000 DOLLARS 05/13/1988 CLOSED
36NP750159 SKED AIR CARRIER

108.5A2

10/23/1986 WESTAIR COMMUTER AIRLINES AIR CARRIER CP FA ACT 1000 DOLLARS 05/13/1988 CLOSED
45NP750160 SKED AIR CARRIER

108.5A2

12/23/1986 WESTAIR COMMUTER AIRLINES AIR TAXI COMUTR CP FA ACT 31530 DOLLARS 02/23/1988 CLOSED
87NP40002 AIR TAXI OPR

135.5

091.29A

043.9

091.167A2

135.21A2

WESTAIR COMMUTER AIRLINES AIR TAXI COMUTR ADMIN ACTION 0 LTR CORRECTION 03/27/1987 CLOSED
87NP40008 AIR TAXI OPR

091.167A2

043.9A4

135.44382

043.98

135.439A2

06/30/1987 WESTAIR COMMUTER AIRLINES OTHER NO ACTION 0 10/01/1987 CLOSED
87NP40039 AIR TAXI OPR

04/14/1987 WESTAIR COMMUTER AIRLINES AIR TAXI COMUTR ADMIN ACTION 0 WARNING LETTER 08/31/1987 CLOSED
87NP40046 AIR TAXI OPR

135.439A1

135.44381

06/25/1987 WESTAIR COMMUTER AIRLINES AIR CARRIER ADMIN ACTION 0 LTR CORRECTION 05/16/1988 CLOSED
87NP40052 SKED AIR CARRIER

135.21A

135.42781

121.36981

121.70981

121.133A

135.44381

07/16/1987 WESTAIR COMMUTER AIRLINES AIR TAXI COMUTR ADMIN ACTION 0 LTR CORRECTION 05/16/1988 CLOSED
87NP40053 AIR TAXI OPR

135.44381

135.42781

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07/04/1987	WESTAIR COMMUTER AIRLINES	AIR TAXI COMUTR	ADMIN ACTION	0	LTR CORRECTION		05/18/1988	CLOSED
87MP040054		AIR TAXI OPR						
						135.44381		
						135.42781		
						135.21A		
07/04/1987	WESTAIR COMMUTER AIRLINES	AIR TAXI COMUTR	ADMIN ACTION	0	LTR CORRECTION		05/14/1988	CLOSED
87MP040055		AIR TAXI OPR						
						135.42781		
						135.44381		
						135.21A		
07/20/1987	WESTAIR COMMUTER AIRLINES	AIR TAXI COMUTR	ADMIN ACTION	0	LTR CORRECTION		05/18/1988	CLOSED
87MP040056		AIR TAXI OPR						
						135.4 2781		
						135.44381		
						135.21A		
08/12/1987	WESTAIR COMMUTER AIRLINES	AIR TAXI COMUTR	ADMIN ACTION	0	LTR CORRECTION		05/18/1988	CLOSED
87MP040057		AIR TAXI OPR						
						135.42781		
						135.44381		
						135.21A		
08/01/1987	WESTAIR COMMUTER AIRLINES	AIR TAXI COMUTR	ADMIN ACTION	0	LTR CORRECTION		05/18/1988	CLOSED
7ucdw*9 W m		AIR TAXI OPR						
						135.21A		
						135.42781		
						135.44381		
07/01/1987	WESTAIR COMMUTER AIRLINES	AIR TAXI COMUTR	ADMIN ACTION	0	LTR CORRECTION		05/18/1988	CLOSED
87MP040059		AIR TAXI OPR						
						135.42781		
						135.44381		
						135.21A		
05/10/1987	WESTAIR COMMUTER AIRLINES	AIR TAXI COMUTR	ADMIN ACTION	0	YARNING LETTER		05/18/1988	CLOSED
87MP040060		AIR TAXI OPR						
						135.42781		
10/31/1985	WESTAIR COMMUTER AIRLINES	AIR TAXI COMUTR	CP-FA ACT	1000 DOLLARS			06/02/ 1988	CLOSED
87MP040061		AIR TAXI OPR						
						135.413A		
08/01/1987	WESTAIR COMMUTER AIRLINES	AIR CARRIER	ADMIN ACTION	0	LTR CORRECTION		05/18/1988	CLOSED
87MP040062		SKED AIR CARRIER						
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121.36981

05/03/1987 WESTAIR COMMUTER AIRLINES AIR TAXI COMUTR NO ACTION 0 03/03/1988 CLOSED
87WPU40063 AIR TAXI OPR

05/05/1987 WESTAIR COMMUTER AIRLINES AIR TAXI COMUTR NO ACTION 0 03/03/1988 CLOSED
87WPU40064 AIR TAXI OPR

08/06/1987 WESTAIR COMMUTER AIRLINES AIR TAXI COMUTR NO ACTION 0 10/30/1987 CLOSED
87WPU40065 AIR TAXI OPR

08/06/1987 WESTAIR COMMUTER AIRLINES AIR TAXI COMUTR NO ACTION 0 10/30/1987 CLOSED
87WPU40066 AIR TAXI OPR

WESTAIR COMMUTER AIRLINES AIR TAXI COMUTR NO ACTION 0 10/30/1987 CLOSED
87WPU40070 AIR TAXI OPR

10/02/1987 WESTAIR COMMUTER AIRLINES AIR TAXI COMUTR ADMIN ACTION 0 LTR CORRECTION 11/17/1987 CLOSED
87WPU40069 AIR TAXI OPR

135.5

WESTAIR COMMUTER AIRLINES AIR TAXI COMUTR NO ACTION 0 12/22/1987 CLOSED
87WPU40095 AIR TAXI OPR

09/25/1987 WESTAIR COMMUTER AIRLINES AIR CARRIER CP FA ACT 1000 DOLLARS 10/21/1988 CLOSED
87WPU40096 SKED AIR CARRIER

121.135A1

05/11/1987 WESTAIR COMMUTER AIRLINES AIR CARRIER ADMIN ACTION 0 WARNING NOTICE 05/13/1987 CLOSED
87WPU10076 SKED AIR CARRIER

100.5A

01/15/1987 WESTAIR COMMUTER AIRLINES AIR TAXI COMUTR CP FA ACT 6000 DOLLARS 05/13/1988 CLOSED
87WPU10014 AIR TAXI OPR

100.5A1

10/14/1987 WESTAIR COMMUTER AIRLINES AIR CARRIER ADMIN ACTION 0 LTR CORRECTION 03/14/1988 CLOSED
87WPU10199 SKED AIR CARRIER

100.5A1

11/06/1987 WESTAIR COMMUTER AIRLINES AIR CARRIER ADMIN ACTION 0 YARNING LETTER 11/12/1987 CLOSED
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87WP750214	SKED AIR CARRIER				100.941		
11/17/1987 WESTAIR COMMUTER AIRLINES	AIR CARRIER	ADMIN ACTION	0	WARNING LETTER		12/15/1987	CLOSED
87WP 750218	SKED AIR CARRIER				100.941		
06/12/1987 WESTAIR COMMUTER AIRLINES	AIR CARRIER	ADMIN ACTION	0	WARNING LETTER		02/17/1988	CLOSED
88WP040036	SKED AIR CARRIER				135.158		
					139.171		
					139.29		
					121.778		
					121.790		
12/27/1987 WESTAIR COMMUTER AIRLINES	AIR CARRIER	ADMIN ACTION	0	WARNING LETTER		02/24/1988	CLOSED
88WP040018	SKED AIR CARRIER				121.15342		
					121.310C3		
12/16/1987 WESTAIR COMMUTER AIRLINES	AIR TAXI COMUTR	ADMIN ACTION	0	LTR CORRECTION		05/27/1988	CLOSEU
88WP040037	AIR TAXI OPR				135.41341		
WESTAIR COMMUTER AIRLINES	AIR TAXI COMUTR	ADMIN ACTION	0	LTR CORRECTION		08/23/1988	CLOSEU
88WP040052	AIR TAXI OPR				135.6344V111		
11/24/1987 WESTAIR COMMUTER AIRLINES	AIR TAXI COMUTR	ADMIN ACTION	0	LTR CORRECTION		09/12/1988	CLOSED
88WP040053	AIR TAXI OPR				135.4294		
05/22/1988 WESTAIR COMMUTER AIRLINES	AIR TAXI COMUTR	ADMIN ACTION	0	LTR CORRECTION		09/12/1988	CLOSED
88WP040054	AIR TAXI OPR				043.134		
06/22/1989 WESTAIR COMMUTER AIRLINES	AIR TAXI COMUTR	ADMIN ACTION	0	LTR CORRECTION		09/12/1988	CLOSEU
88WP040055	AIR TAXI OPR				135.210		
06/20/1989 WESTAIR COMMUTER AIRLINES	AIR TAXI COMUTR	NO ACTION	0			08/23/1988	CLOSED
88WP040056	AIR TAXI OPR						
05/29/1988 WESTAIR COMMUTER AIRLINES	AIR TAXI COMUTR	ADMIN ACTION	0	LTR CORRECTION		08/23/1988	CLOSEU
88WP040057	AIR TAXI OPR				135.6304		

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FDN HENRY JEFFERSON

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OPERATION TYPE FINAL ACTION

FINAL AMT

FINAL SANCTION

FINAL REGULA

FINAL DATE STATUS

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10/14/1988 WESTAIR COMMUTER AIRLINES AIR CARRIER NO ACTION 0 11/07/1988 CLOSED
BRMP 170003 SKED AIR CARRIER

10/31/1988 WESTAIR COMMUTER AIRLINES AIR TAXI COMUTR ADMIN ACTION 0 LTR CORRECTION 11/22/1988 CLOSEU
BRMP 170009 AIR TAXI OPR

135.413A
135.413B1

11/17/1988 WESTAIR COMMUTER AIRLINES AIR CARRIER OPEN
BRMP 170014 SKED AIR CARRIER

12/19/1988 WESTAIR COMMUTER AIRLINES AIR CARRIER ADMIN ACTION 0 WARNING LETTER 03/11/1988 C L O S E U
BRMP 710049 SKED AIR CARRIER

100.5A

01/15/1989 WESTAIR COMMUTER AIRLINES AIR CARRIER ADMIN ACTION 0 WARNING LETTER 01/28/1988 CLOSEU
BRMP 750022 SKED AIR CARRIER

100.5A2

04/05/1988 WESTAIR COMMUTER AIRLINES AIR CARRIER U ACTION 0 09/14/1989 CLOSED
BRMP 750070 SKED AIR CARRIER

05/25/1989 WESTAIR COMMUTER AIRLINES AIR CARRIER ADMIN ACTION 0 WARNING LETTER 07/19/1988 CLOSED
BRMP 750120 SKED AIR CARRIER

100.5A1
100.17P2

05/26/1989 WESTAIR COMMUTER AIRLINES AIR CARRIER ADMIN ACTION 0 YARNING LETTER 07/19/1988 CLOSED
BRMP 750111 SKED AIR CARRIER

100.5A1

06/22/1989 WESTAIR COMMUTER AIRLINES AIR CARRIER OPEN
BRMP 750136 SKED AIR CARRIER

11/22/1988 WESTAIR COMMUTER AIRLINES AIR CARRIER DND ASSESS CP F 675 DOLLARS 111001949 CLOSED
BRMP 750226 SKED AIR CARRIER

100.5B
100.5A1
100.9A

11/22/1989 WESTAIR COMMUTER AIRLINES AIR CARRIER NO ACTION 0 03/27/1989 CLOSED
0 000-00000 SKED AIR CARRIER

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01/24/1989 WESTAIR COMMUTER AIRLINES AIR CARRIER ADMIN ACTION 0 WARNING LETTER 03/30/1989 CLOSED
89WP030004 SKED AIR CARRIER

121.153A2
043.13A

08/23/1989 WESTAIR COMMUTER AIRLINES AIR CARRIER ADMIN ACTION 0 LTR CORRECTION 10/11/1989 CLOSED
89WP090161 SKED AIR CARRIER

135.21A

01/07/1989 WESTAIR COMMUTER AIRLINES AIR CARRIER
89AP170002 SKED AIR CARRIER OPEN

01/11/1989 WESTAIR COMMUTER AIRLINES AIR TAXI-COMUTR NO ACTION 0 02/03/1989 CLOSED
89AP170003 AIR TAXI OPR

12/23/1988 WESTAIR COMMUTER AIRLINES AIR CARRIER ADMIN ACTION U WARNING LETTER 01/26/1989 CLOSED
89AP170004 SKED AIR CARRIER

121.3A

01/31/1989 WESTAIR COMMUTER AIRLINES AIR CARRIER ADMIN ACTION 0 LTR CORRECTION 02/13/1989 CLOSED
89AP170005 SKED AIR CARRIER

121.317E

05/17/1988 WESTAIR COMMUTER AIRLINES AIR TAXI-COMUTR ADMIN ACTION 0 LTR CORRECTION 03/10/1989 CLOSED
89AP170010 AIR TAXI OPR

043.13A
043.13B
023.807B

03/10/1989 WESTAIR COMMUTER AIRLINES AIR CARRIER ADMIN ACTION 0 LTR CORRECTION 04/07/1989 CLOSED
89AP170025 SKED AIR CARRIER

121.3A

07/24/1989 WESTAIR COMMUTER AIRLINES AIR TAXI-COMUTR NO ACTION 0 04/21/1989 CLOSED
89WP170026 AIR TAXI OPR

07/11/1989 WESTAIR COMMUTER AIRLINES AIR TAXI-COMUTR ADMIN ACTION 0 WARNING LETTER 08/29/1989 CLOSED
89AP170033 SKED AIR CARRIER

135.41381

12/03/1989 WESTAIR COMMUTER AIRLINES AIR TAXI-COMUTR ADMIN ACTION 0 WARNING NOTICE 12/28/1989 CLOSED
89AP170075 AIR TAXI OPR

PREPARED BY OPERATIONAL SYSTEMS BRANCH AVN120

ENFORCEMENT REPORT DATA FOR
WESTAIR COMMUTER AIRLINES
FOR THE PERIOD OF JANUARY 1, 1981 0
SORTED BY REPORT NUMBER

DATE OF PRINT

DATE U P PRINT IS AUG 01, 1990 PAGE 8

FOR HENRY MEDINA

VIOL DATE VIOLATION NAME OPERATION TYPE FINAL ACTION

REPORT NUM EMPLOYER OR RESPONSIBLE AC CERT TYPE

FINAL AMT FINAL SANCTION FINAL REGULA FINAL DATE STATUS

135.9

06/07/1989 WESTAIR COMMUTER AIRLINES AIR CARRIER
89WP710151 SKED AIR CARRIER

OPEN

03/29/1989 WESTAIR COMMUTER AIRLINES AIR CARRIER NU ACTION
89WP750042 SKED AIR CARRIER

05/31/1989 CLOSED

05/01/1989 WESTAIR COMMUTER AIRLINES AIR CARRIER
89WP750056 SKED AIR CARRIER

OPEN

05/02/1989 WESTAIR COMMUTER AIRLINES AIR CARRIER
89WP750067 SKED AIR CARRIER

OPEN

07/06/1989 WESTAIR COMMUTER AIRLINES AIR CARRIER
89WP750139 SKED AIR CARRIER

OPEN

11/21/1989 WESTAIR COMMUTER AIRLINES AIR CARRIER
89WP750179 SKED AIR CARRIER

OPEN

05/17/1990 WESTAIR COMMUTER AIRLINES AIR CARRIER
90WP030008 AIR TAXI OPR

OWN

03/26/1990 WESTAIR COMMUTER AIRLINES AIR TAXI OTHER
90WP170015 AIR TAXI OPR

OPEN

01/25/1990 WESTAIR COMMUTER AIRLINES AIR TAXI COMMUTER
90WP150021 SKED AIR CARRIER

OPEN

05/07/1990 WESTAIR COMMUTER AIRLINES
90WP750082 SKED AIR CARRIER

OPEN

06/14/1990 WESTAIR COMMUTER AIRLINES
90WP150093 SKED AIR CARRIER

OPEN

PREPARED BY OPERATIONAL SYSTEMS BRANCH AVN120

12/10/92 update
8/19/93 update

Attachment A

COMPILATION OF FAA LEGAL ACTIONS
AGAINST WESTAIR AND ITS ASSOCIATES

I. Actions against Company

A Maintenance/Operations

FAA Case No. 91WP170032/Our File No. 9105UEX0461

Alleged Subject Matter: Discrepancies in pilot records

FARs Alleged: 135.299(b), 135.323(c) and 135.341

FAA Proposed Action: \$10,000.00 civil penalty.

Final Action: Settled by payment of \$6,000.00 offer in compromise

Finding of Violation: None.

Status: Closed 9/8/1992

FAA Cases Nos. 91NM090004, 005, 006/Our File No. 9101UEX447

Alleged subject matter: Runway incursions at PDX while aircraft were being taxied by maintenance personnel.

FARs Alleged: 91.129(h) and 91.13(b).

FAA Proposed Action: \$4,000.00 civil penalty

Status: This matter went to hearing on June 15, 1991. Immediately prior to the hearing, the FAA withdrew its allegation of violation of FAR Section 91.129(h). On September 14, 1992, DOT Administrative Law Judge Burton S. Kolko issued his Initial Decision and Order finding WestAir in violation of FAR Section 91.13(b) (careless operation) and assessed a civil penalty of \$3,000.00. We have appealed the Administrative Law Judge's initial decision. Under the FAA's new civil penalty program, this appeal is now before the Administrator. We are awaiting receipt of the FAA's reply brief which will be due at the end of December, 1992. A copy of our Appeal Brief is enclosed as Attachment E.

closed
6/9/93
FAA Admin
CP to reduced
\$2,000

F-AA Case No. 91NM010232/Our File No. 9205UEX0515

Alleged Subject Ratter: Operation of a BAe-146 with aft overhead compartment containing protective breathing equipment locked closed and EL-deferred.

FARs Alleged: 121.153 (a)(2), 121.337(b)(9) and 121.337(c)(2).

FAA Proposed Action: \$6000 civil penalty.

Final Action: The FAA has issued a Final Notice of Proposed Civil Penalty (\$6000). We have appealed and requested a hearing.

Finding of Violation: N/A

Status: Awaiting hearing before DOT Administrative Law Judge (estimated spring-summer, 1993).

7/23/93
Settled
after m
Compromise
\$6,000
no fine

B. Airport/Security Cases

FAA Case No. 88WP750136/Our File No. 8902-UFX-0338 (FAT)

Alleged Subject Matter: Unbadged individual observed unloading refreshment-supplies from a delivery truck in the AOA at FAT East of Gate 6.

FARS Alleged: 108.5(a)(1)

FAA Proposed Action: \$7,500.00 civil penalty.

Final Action: Pending.

Finding of Violation: N/A

Status: Pending; Informal conference was held on September 12, 1989. We are still awaiting the FAA's disposition.

FAA Case No. 89WP750067/Our File No. 8905UFX0359 (CIC)

Alleged Subject Matter: Unattended aircraft at CIC and unauthorized access to aircraft; failure to challenge unbadged individual.

FARS Alleged: 108.13(a)

FAA Proposed Action: \$7,500.00 civil penalty.

Final Action: Settled by payment of \$7,500.00 offer in compromise.

Finding of Violation: None.

Status: Closed 6/24/92

FAA Case No. 89WP750135/Our File No. 9001UFX0399 (SMF)

Alleged Subject Matter: SMF-contract security screener failed to detect FAA hand grenade test object at carrier-shared security checkpoint.

FARS Alleged: 108.5(a)(2)

FAA **Proposed** Action: \$1000.00 civil penalty.

Final Action: Settled by payment of \$153.00 offer in compromise.

Finding of Violation: None

s t a t u s : Closed 7/3/92

FAA Case No. 90WP710414/Our File No. 9012UEX0437 (OXR)

Alleged Subject Matter: Failure to detect a hand grenade test object at OXR. The **WestAir** screener indicated that the test object looked **like** a perfume bottle as it passed through the x-ray device.

FARS alleged: 108.9(a)

FAA Proposed Action: \$1,000 civil penalty..

Final Action: Settled by payment of \$153.00 offer in compromise.

Finding of Violation: None

Status : Closed 7/20/92

FAA Case No. 90WP710446/Our File No. 9101UEX0443 (SNA)

Alleged Subject Matter: Failure of security screening contractor at SNA to detect **opaque** rectangle test object at carrier-shared security checkpoint.

FARS Alleged: 108.5(b)

FAA Proposed Action: \$1,428 civil penalty.

Final Action: On January 28, 1992, the FAA withdrew and closed this case without action.

Finding of Violation: None.

Status: Closed 1/28/92

FAA Case No. 89WP7510056/Our File No. 8906UEX0360 (SMF)

Alleged Subject Matter: Carrier-shared security **contractor's** alleged failure to maintain current and accurate training **records** for **checkpoint** security employees, failure to maintain minimum employment standards and training for **checkpoint** security **supervisors**, and failure to update training for, and provide periodic retesting of checkpoint security **supervisors** at SMF.

FARS Alleged: 108.5(a)(1)

FAA Proposed Action: Civil penalties in the amount \$24,000 each

against **WestAir** and the other nine SIG-based carriers.

Finding of Violation: **N/A**

Status: ~~Pending~~; **USAir** has recently settled its case with the FAA for **civil penalty compromise**, with no finding of violation, in the amount of \$1000. We **recently**, by letter, demanded that the FAA withdraw the action against **WestAir** a recent U.S. District Court decision in U S. v. American Airlines. et al., (also known as the San Antonio Decision). A copy of our letter is enclosed hereto as **Attachment F**.

*Closed -
Settled via
Compromise
\$1,000 -
No finding*

90WP750082/Our File No. 9103UEX0452 (RNO)

Alleged Subject Matter: Aircraft left unattended and unlocked at **RNO** and unauthorized access by FAA special agent. Access to AOA was controlled by United Airlines.

FARs Alleged: 108.5(a) (1)

FAA Proposed Action: \$7,500 civil penalty.

Final Action: Settlement has been agreed upon by means of payment of \$3,750 civil penalty offer in compromise, with no finding of violation.

Finding of Violation: **None.**

Status: ~~Awaiting WestAir's~~ check in the civil penalty compromise amount.

*Closed - Settled
via compromise*

FAA Case No. 90WP750048/Our File No. 9103UEX0453 (MRY)

Alleged Subject Matter: United Airlines' failure to provide a qualified ground security coordinator on duty for operations at **MRY**.

FARs Alleged: 108.10(a) (1) and 108.10(b)

FAA Proposed Action: \$7,500 civil penalty.

Final Action: Settlement has been agreed upon by means of **WestAir's** tender of a \$500 civil penalty offer in compromise with no finding of violation.

Finding of Violation: **None**

Status: ~~Pending~~; awaiting **WestAir's** tender of **check** in the civil penalty settlement amount.

*Closed
via
Compromise*

FAA Case No. 89WP750179/Our File No. 9107UEX0465 (RDD)

Alleged Subject Matter: **Failure** to **detect** dynamite bomb test object at **RDD**.

FARS Alleged: 108.5(a)(3)

FAA Proposed Action: \$2,000 civil penalty.

Final Action: FAA withdrew this case.

Finding of Violation: None

Status: Closed 3/18/92

FAA Case No. 90WP750067/Our File No. 9107UEX0466 (SMF)

Alleged Subject Matter: Failure to detect **dynamite** bomb test object by carrier-shared security screening contractor at **SMF**.

FARS Alleged: 108.5(a)(3)

FM Proposed Action: \$10,000 civil penalty.

Final Action: Settled by means of offer in compromise in the amount of \$1,530.

Finding of Violation: None.

Status: Closed 7/30/92

FAA Case No. 90WP710346/Our File No; 9107UEX0467 (SNA)

Alleged Subject Matter: Failure to detect encapsulated weapon test object by carrier-shared security screening contractor at **SNA**.

FARS Alleged: 108.9(a)

FM Proposed Action: \$142.85 civil penalty

Final Action: The FAA has **agreed** to withdraw this case in its entirety.

Finding of Violation: None.

Status : Awaiting receipt of FAA order terminating this proceeding.

C. Hazardous Materials

None.

II. Actions against WestAir Associates

A. Maintenance/Operations

1. Flight Crewmember Cases

8803MEA0287. The FAA had proposed suspension of this first officer's pilot certificate for a period of 30 days for landing at the wrong **airport**, i.e., SMX as opposed to SBP. The two airports are approximately 26 miles apart. The FAA subsequently agreed to reduce the suspension to **15** days. Nonetheless, we appealed to the National **Transportation Safety Board**, arguing **that all** navigation and communication **responsibilities** were being performed by the captain and that the first officer, as the flying pilot, was merely complying with instructions that the captain was relaying to him. The NTSB Administrative Law Judge agreed with our **position** and dismissed the **FAA's** enforcement action in its entirety. The FAA appealed this matter to the full Board, which reversed the initial decision and order of the Administrative Law Judge, and reimposed the **15-day suspension** (Attachment G).

8712SRF0266. The FAA proposed to suspend an **SD3-60 captain's ATP** certificate for a period of 30 days by reason of his **aircraft's** collision with parked aircraft at SMF. He was working as a training captain on the flight in question. Through no fault of his own, or of any other **crewmembers**, the aircraft experienced a hydraulic system failure resulting in a loss of steering and brakes. Upon landing at SMF, rather than remaining on the runway and impeding **runway** utilization, the captain elected to taxi to the parking area. According to **WestAir's SD3-360** training materials, the emergency hydraulic accumulator will permit eight to ten brake applications even after a hydraulic system failure. As the aircraft taxied to the ramp, the captain counted all brake applications. Unfortunately, after only five to six brake applications, the accumulator ran out of pressure. The aircraft was unable to stop, hit two aircraft and came to a rest in the airport perimeter fence. We appealed the **FAA's** enforcement action to the **NTSB**. The NTSB Administrative Law Judge concluded that the captain had reasonably relied upon the training materials and information given to him by the company and dismissed the FAA's enforcement action. The FAA **appealed that** decision to the full **NTSB**, which reversed its **Administrative Law Judge's** decision and order (Attachment H). In its opinion and order, the Board considered the testimony of **WestAir's** pilot expert that had he been confronted with the same circumstances, he would have stopped the aircraft on the **runway** and called for assistance in towing the aircraft to the parking area. The Board also considered the fact **WestAir** had imposed a disciplinary **suspension** of the captain's employment.

8903PMX0341 and 8903LMO0344. The FAA brought these cases against the captain and first **officer** of an **EMB-110** on a night time **departure** from SFO. XTC had cleared the aircraft to taxi to and **depart** from **runway 01R**. At the time that the aircraft initiated its **takeoff** roll, it was not on runway 01R but rather on taxiway L which is to the right of and parallel to runway 01R. After rolling just a few feet and **prior to the aircraft achieving** flying speed, the **crewmembers** realized their mistake* and **terminated** the takeoff. XTC subsequently canceled the **takeoff**

clearance. The FAA proposed suspension of both **crewmember's** pilot certificates for 30 days each. We appealed the FAA actions to the **NTSB**. The first officer's case was held in abeyance pending resolution of the captain's case. At the trial before the NTSB Administrative Law Judge in the captain's case, **WestAir** management conceded that the captain and the first officer should not have been paired together as both crewmembers were relatively inexperienced and were not familiar with **SFO**. Additionally, there was substantial construction activity in the vicinity of the **runway** 01 complex which caused the **crewmembers** to become disoriented. At the conclusion of the hearing, the Administrative Law Judge concluded that the FAA had nonetheless established violations of pertinent **FARs**, but imposed no suspension by reason of the captain's having filed a timely NASA ASRS report. We appealed the Judge's initial **decision** to the extent that findings of violation were made. The full Board reversed the FAA on the allegation of violation of FAR 135.21 (compliance with a carrier manual), but otherwise **affirmed the** Administrative Law Judge's decision (Attachment I). **In the** related first officer's case, the FAA agreed to withdraw the allegation and finding of careless operation. The case was settled without a suspension.

2. Maintenance Cases

9102YVU0451 The FAA proposed to suspend this associate's mechanic certificate for a period of 30 days by reason of his failure to secure a full flow chip detector on the **#3** engine of a **BAe 146**. The aircraft departed **SFO** for **SNA** and shortly after takeoff, the **#3** engine indicated low oil pressure necessitating an in-flight shutdown and return of the aircraft to **SFO**. Upon arrival at **SFO**, the full flow chip detector probe was found hanging from the lock clip and cable. The FAA subsequently withdrew the charges against this associate and closed the matter without action.

9111LRG0490. This case is very similar to the preceding case. This case represents the third instance in which a full flow chip detector came loose during a **WestAir** flight. The FAA was not as lenient in this case, probably stemming from a prior enforcement action involving this associate. They proposed the assessment of a \$2,000 civil penalty. The case has recently been settled for a civil penalty offer in compromise, with no finding of violation, in the amount of \$350 which the former associate has agreed to pay out of his personal funds.

3. Airports/Security

None.

C. Hazardous Materials

None.

Attachment B

OUTSTANDING LETTERS OF INVESTIGATION
WITH POTENTIAL FOR FAA ENFORCEMENT ACTIONS

I. Actions Against Company

A. Maintenance/Operations

FAA Case No. 92WP170022/Our File No. 9207UEX0525

On July 10, 1992, the FAA issued **WestAir** a Letter of Investigation (LOI) alleging that during the period from June 26, 1992 to July 9, 1992, **WestAir** conducted approximately 100 flights in which four captains had not received current line checks. We responded to the LOI. This matter is currently in the FAA's regional legal office and is awaiting the institution of an enforcement action.

B. Airport/Security Cases

FAA Case No. 91WP710164/Our File No. 9107UEX0463 (SMX)

On July 2, 1991, the FAA issued **WestAir** a LOI alleging the failure of a security screening operator (a Wings West/American Eagle employee) to detect a dynamite bomb test object. We responded to the LOI and have heard nothing further since that time. The present status of this case is unknown.

FAA Case No. 910WP750123/Our File No. 9112UEX0495 (SMF)

On November 29, 1991, the FAA issued **WestAir** a LOI asserting that a Wackenhut security x-ray operator had failed to detect a hand grenade test object. We responded to the LOI and have heard nothing further since that time. The present status of this matter unknown.

FAA Case No. 92WP750051/Our File No. 9203UEX0513 (STS)

On May 15, 1992, the FAA issued a LOI to **WestAir** advising that a **WestAir** employee had failed to detect (by physical search) an FAA-toy pistol test object. **WestAir** responded to the LOI and has heard nothing since. The present status of this case is unknown.

FAA Case No. 92WP710122/Our File No. 9203UEX0514 (SNA)

On April 6, 1992, the FAA issued a LOI alleging that we had not met the ground security coordinator (GSC) requirements for evening departures on April 2, 1992. The FAA special agent on site interviewed the supervisor on duty who apparently advised that he had not been GSC qualified and had not received any formal GSC training. **WestAir** responded to the LOI advising that United Airlines handles the entire **WestAir** operation at SNA and

2 yr. limitation
period has
lapsed
FAA now
pursuing
inquiry
action

2 yr. period
lapse on
11/29/92

that the supervisor on duty was employed by United. We have heard nothing from the FAA since and the present status of this matter is unknown.

c. Hazardous Materials

FAA Case No. 92WP750110/Our File No. 9208UEX0527

On July 23, 1992, the FAA issued **WestAir** a **LOI** arising out of the December 27, 1991 COMAT shipment of aircraft paint and high gloss activator from SMX to FAT. The shipment was prepared by the paint vendor and left at the ticket counter at SMX. During the flight from **SFO** to FAT, one of the containers of activator leaked. As the aircraft was being unloaded at FAT, fumes were discovered escaping from the package. We responded to the LOI and have heard nothing from the FAA since that time. It is anticipated that the FAA will institute some enforcement action.

II. Actions against WestAir Associates

FAA Case No. 91WP170057/Our File No. 9109WSB0476

On August 23, 1991, the FAA issued a Letter of Investigation to an ACA associate concerning the installation of a main landing gear wheel assembly on a J-3201 aircraft. This was **WestAir's** second system-wide incident involving improper installation of the right main landing gear wheel assembly. In a prior FAA case against a **WestAir** associate (Our File No. 9104BRH0454) the FAA, upon reviewing our response to the Letter of Investigation, determined that no violation had occurred and closed the matter without action. Although we have heard nothing further from the FAA since responding to the LOI on September 6, 1991, in this case, we believe that the FAA will eventually make the same disposition as it did in the prior case. The date of the incident was August 1, 1991. The FAA is precluded from instituting certificate action against this former employee because they have exceeded the six-month statute of limitations for initiation of certificate action. The limitations period for institution of a civil penalty will expire on July 31, 1993. However, considering the length of time that has elapsed, it is unlikely that any action will be taken at this time.

Attachment C

Self-Disclosure made by WestAir Pursuant
to the FAA's voluntary self-disclosure program

FAA Case No. _____ /Our File No. 9111UEX0486

Overflight of AD.

AD 90-24-01 requires inspection and or rework of the third stage disk of the ALF 502 engine prior to 7500 cycles. Aircraft **N293UE** was removed from **WestAir's** fleet on September 5, 1991. According to **WestAir's** records, 683 cycles remained on one engine prior to the required accomplishment of this AD. Approximately six weeks later, it was determined that **WestAir's** records were in error and that the AD had been overflown by 798 cycles. **WestAir** voluntarily self-disclosed this discrepancy to the FM on October 30, 1991. **WestAir's** report was acknowledged by FAT FSDO on November 19, 1991. It is unknown as to whether the FSDO ever closed this matter.

FAA Case No. _____ /Our File No. 9210UEX0542

Pilot Records/Recency Experience.

On October 23, 1992 **WestAir** verbally disclosed its inadvertent noncompliance with **FARs** Sections 121.439, 135.293, 135.297 and 135.301. This verbal disclosure was followed up by letter dated October 26, 1992: By letter dated November 12, 1992 the FAA accepted **WestAir's** disclosure and corrective action and closed this matter without pursuing legal enforcement action. A Letter of Correction was issued.

Page 1

93-08-12 12:46:57

(AYIMISH1)

ISIS Enforcemnt Information

Enforcement records meeting criteria for: ASOA

Viol.Date	Status	Rgn	Cese #	Related Case #	FAR's Violated (1)
83 12 01	CLOSED	so	86S0670294		121.135A4 <i>Manual</i>
84 12 01	CLOSED	so	89S0110018		121.434C3I <i>Pilot</i>
36 04 18	CLOSED	so	86S0730182	86S0730287	108.5A2 <i>Station</i>
86 04 2 2	CLOSED	so	8630720012		108.5A1 "
86 04 2 2	CLOSED	so	8630720032	86S0720024	
86 05 17	CLOSED	so	86S0730287	8690730182	108.5A2 "
86 05 20	CLOSED	so	86S0730304		108.5A1
86 06 17	CLOSED	so	86S0730350		175.25 <i>Station</i>
86 07 12	CLOSED	SO	89S0110019		121.424 <i>Pilot</i>
86 08 1 6	CLOSED	so	8630670295		135.265A3 <i>Pilot</i>
86 09 10	CLOSED	so	86S0670300		135.630 <i>Records</i>
86 09 10	CLOSED	so	86S0670301		135.265A3 <i>Pilot</i>
86 10 20	CLOSED	so	86S0760137		108.5A2 <i>Station</i>
86 10 20	CLOSED	so	86S0760138		108.5A1 <i>Station</i>
86 12 03	CLOSED	SO	86S0730618		108.17B "
87 01 1.3	CLOSED	so	87S0730036		108.5
87 03 10	CLOSED	SO	87S0730137		108.5A1
87 07 2 1	CLOSED	FA	87EAO90070	87EAO90069	91.27A2
88 02 03	CLOSED	so	8880730039		108.5A3
88 02 2 3	CLOSED	so	8830730082		108.17A4
88 0 3 01	CLOSED	so	88S0670143		121.383A2
88 04 2 6	CLOSED	so	8880730200		108.5B
88 04 2 7	CLOSED	so	8850730186		108.55
88 04 2 7	CLOSED	so	88S0730188		108.5A1
88 04 2 8	CLOSED	so	8830730190		108.5B
88 05 2 6	CLOSED	SO	8850670261		135.61381
88 05 3 1	CLOSED	so	88S0670148		43.13B
88 06 0 6	CLOSED	SO	88S0670242		135.633
88 06 0 6	CLOSED	so	8850670196		135.633
88 06 0 6	CLOSED	SO	88S0670144		135.75B
88 06 0 8	CLOSED	so	88S0730259		108.5A
88 06 2 0	CLOSED	so	8850670169		43.13B
88 07 2 8	CLOSED	so	88S0670150		135.5
88 07 2 8	CLOSED	SO	88S0730305		108.5A1
88 09 2 0	CLOSED	so	89S0110054		121.133A
88 09 2 6	CLOSED	so	89S0110020		121.97A
88 09 2 7	CLOSED	so	89S0110053		121.665
88 11 0 3	CLOSED	SW	88SW110015		135.5
88 12 0 7	CLOSED	so	8850730533		108.5A1
89 03 0 6	CLOSED	so	89S0730099		108.5A1
89 0 5 15	CLOSED	SO	89S0730220		108.5
89 05 1 5	CLOSED	so	89S0730221		108.5A
89 05 2 3	CLOSED	so	89S0730229		108.5A
89 05 2 3	CLOSED	so	8930730226		108.5A
89 06 2 7	CLOSED	so	89S0730318		108.5A1
90 0 3 2 7	CLOSED	SW	90SW710147		171.24
90 04 1 2	CLOSED	so	90S0730132	90S0730133	108.5A1
90 0 6 1 2	CLOSED	so	90S0730133	9030730132	108.5A1
90 0 9 1 2	CLOSED	SW	90SW710362	90SW710335	108.5A1
90 12 1 7	OPEN	SW	90SW110054	90SW110053	155.5
90 12 2 8	CLOSED	SO	90S0730520		108.5A1
91 02 0 1	OPEN	so	91S0730047		108.5A3
91 08 1 3	CLOSED	SO	91S0730213		108.5A1