BEFORE THE DEPARTMENT OF TRANSPORTATION OFFICE OF THE SECRETARY WASHINGTON, D.C.

Application of

VIRGIN AMERICA, INC.

For a certificate of public convenience and necessity under 49 U.S.C. § 41102 to engage in interstate scheduled air transportation.

Docket OST - 05 - 23307

MOTION

BY

AIR GUMBO, INC.

TO SUPPORT

APPLICATION OF VIRGIN AMERICA, INC.

Communications with respect to this document should be sent to:

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Dated: January 6, 2006

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AIR GUMBO, INC.

TO SUPPORT

APPLICATION OF VIRGIN AMERICA, INC. FOR A CERTIFICATE OF PUBLIC CONVENIENCE AND NECESSITY.

Air Gumbo, Inc., requests that the application of Virgin America, Inc., to the Department of Transportation for a Certificate of Public Convenience and Necessity authorizing it to engage in interstate scheduled air transportation of persons, property, and mail, be processed by a simplified, non-hearing expedited procedure pursuant to Subpart Q of the Department's Procedural Regulations, upon a successful determination by the Department that Virgin America, Inc., has meet the U.S. citizen requirement.

As a starting-up airline our self, Air Gumbo, Inc. believes that the grant of the requested authority would be consistent with the competitive spirit of the Department, as

well as the Department and Congressional policy as exemplified by the signing of The Wendell H. Ford Aviation Investment and Reform Act on April 5, 2000.

WHEREFORE, on the basis of the foregoing by the founder and chief executive officer of AIR GUMBO, INC. respectfully requests that the Department grant Virgin America, Inc., an expedited process and grant any other relief as it may find to be in the public interest.

Respectfully submitted,

Ralston Champagnie Founder & Chief Executive Officer AIR GUMBO, INC Oil Center, Box 52375, Lafayette, LA 70505-2375 337-781-0034