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The Environment: think global, act local (or at least regionally)

The beginning of the new year allows us to look back on 2008 with some perspective. For most of last year the development of the aviation part of the European emission trading scheme seemed to dominate European aviation. Finally, what was the first final outcome of the year was the agreement (in the middle of the year) on the basic structure for the aviation sector's entry into the broader European Union Emission Trading Scheme (EU ETS).

Then, in the second half of the year, the overall EU ETS, and thus consequently the aviation component of it, was reviewed in preparation for the next phase of the ETS, running from 2013. There were real fears, until the very last moment, that again, the aviation sector would face significant changes to the just agreed scheme.

But it is an ill wind that blows no good, and at least in the short term, from one perspective, aviation was saved by the bell. The particular bell was the need for Europe to present a united, agreed, front at the Poznan preliminary meeting of the parties to the Framework Convention on Climate Change (the Kyoto Protocol).

The Poznan meeting was a global meeting, convened by the UN, to plan and prepare for the ten year review and rewrite of the Framework Convention and Kyoto Protocol, to be conducted in Copenhagen at the end of this year. Suddenly the need for Europe to maintain its 'pole position' in the moral superiority stakes on the international stage meant that there was an unholy rush to agree to an overall package.

Therefore, the second final outcome for the year was an agreement that there be no change to the aviation component of the scheme. Aviation, at least in Europe, at least in the short term, was a relative winner. Who would have thought that the aviation industry would be grateful for a perceived need for a global agreement on climate change inside the general UN process, rather than outside it?

So then attention turned to Poznan. The Poznan meeting was a preparatory meeting, with various players setting out their concerns and issues. The USA was not officially represented (not being a party to the Kyoto Protocol) but Al Gore attended, representing the president-elect. As ever with this sort of meeting, what was happening in public was of little interest, and of little relevance. The real work happens in back rooms. Once, these rooms were inevitably 'smoke-filled,' but the absence of smoke makes them no less transparent to outside observers.

From the perspective of aviation, the big debate concerns ICAO's role. In Kyoto, air transport was able to argue that it was special, and consequently, it was taken out of the mainstream of the convention. Aviation is in the Kyoto Protocol, but with no target assigned. Rather, ICAO was delegated to manage the issues surrounding air transport and the environment.

There has been much said about the way in which ICAO has discharged that role to date, and after Europe unilaterally went ahead with including air transport in its ETS, ICAO conceded that it might be time to act. The most recent general assembly of ICAO

last year established the group on international aviation and climate change. We have written previously about GIACC.

Whilst there is criticism from most quarters on the way in which ICAO has managed the environmental brief, at Poznan, ICAO showed that it can deliver if it wants to; there is a strong feeling that ICAO lobbied hard enough to ensure that it remains outside the mainstream. So much so the European Union's major communication on preparation for Copenhagen makes clear that they think aviation has to be included in the new treaty.

So that is a victory then? Well, not, perhaps, if you chose to sit back and think it through. Rather, what it might mean is that aviation will continue to be a target of more radical environmental groups – particularly if the ICAO initiative after a mighty labour brings forth a gnat.

What will be the outcome if ICAO fails to deliver a package suitable to all (reasonable) parties? There are aspects of the Kyoto language that can be of benefit to aviation – the clean development mechanism and joint implementation procedures for example. To get access to those parts of the treaty will call for give and take. It is not like the air transport industry can refuse to acknowledge the treaty, or fail to ratify it, or otherwise act like President Bush. Part of the giving and the taking might need to be another part of the Kyoto language: emission trading.

And ICAO will need to bring in such countries as China, Brazil and India. There is one school of thought, post Poznan, which says an emission trading scheme might in fact be the only way to bring those countries into the fold. That's ironic.

So ICAO is caught on the horns of a dilemma. It felt the need to preserve its role in the environment debate, in no small measure to ensure that industry-sympathetic solutions could be developed, but by doing so, it is likely to need to use the standard process. At the same time, if it does nothing (not an outcome that can be easily discounted), aviation is likely to have to comply with an increasing number of regional emission trading schemes in any event.

Already, we have seen regional schemes in Europe and proposals for such schemes in a number of states in the USA. Australia has developed a national scheme (international aviation is exempt), as has New Zealand and Japan. These national and regional schemes are likely to include reciprocation/exemption clauses, such as in the European ETS. Aviation will then survive on a patchwork quilt-like array of such exemptions, with particular sectors being subject to analysis of the arrangements in place, reminiscent of the bad old days of the Warsaw Convention.

The good news is that overseeing that, and managing these overlaps and interfaces, might finally give a role to ICAO.

CANSO one step forward, one step back

It is probably fair to say that if one were to put the world's air navigation service providers' safety directors in a room, one would have a significant percentage of the

world's expertise on the subject in one place. It is not clear that the same would be said if one were to put all of the ANSPs' customer service directors in the one room. Indeed, judging by their recent respective outputs, it would be very hard to put these two groups in the same school, let alone the same class.

The work of the safety directors was seen late last year when CANSO's annual Safety Seminar agreed to two industry standards for safety management systems and safety metrics. This was ground breaking work, both for ANSPs in general, and for CANSO in particular.

There are a number of things to note about this; first, CANSO, representing commercialised ANSPs, has moved into the standards development area. Other aviation industry sector bodies, such as the Airports Council International have also started doing this recently (as the Aviation Intelligence Reporter noted in our October 08 edition www.aviationadvocacy.aero/newsletter), and now CANSO, rightly, in our view, is doing so too.

Secondly, it would only have been a few years ago at most that everyone would have assumed that ICAO was the only body authorised to do such a thing. Then everyone would have looked to ICAO to produce such a standard. And looked, and looked...

CANSO is to be applauded for taking matters into its own hands and producing such a timely document. What we are watching is the decentralisation of industry standard making away from IATA. For many decades it was thought that the various IATA anti-trust immunities made it the One True Source of standards for the industry. It turns out that in fact the immunities may have been holding back development. Isn't that interesting?

At the same time, this development signifies a shift in the balance of power. Standards are still being developed by subject matter experts, but experts who have a perspective that is not focussed on the airlines' requirements alone. Previously, when it was felt that everyone needed the protection of the IATA immunities, the subject matter experts tended to be from the airlines. This will become an increasingly important change.

The backward step

Unfortunately, late in December much of standard setting good work done by the safety committee was undone. CANSO's customer relations committee, in conjunction with IATA, released what it called a guidance document for 'surviving these turbulent times'. To be fair, it is not called a 'standard', but it might be considered what the old IATA standard operating procedure would have called a 'recommended practice.'

There have been airlines for more than 80 years. For most of that time, airlines have depended on air traffic controllers. The principle that each State controls its own airspace first makes it to the big time in the Treaty of Versailles at the end of World War One. So air traffic control is not exactly a new science. So why are ANSPs constantly undergoing existential angst?

Do they exist? In what form should they exist? What is the right way for them to be structured? Do they have an identity outside of their owners? All good questions, and sadly, yet again – or is that still – on the table. Clearly, CANSO has caught this bug, too.

In November, CANSO's Secretary General Alexander ter Kuile gave a rousing speech outlining what he considers the path to maturity for ANSPs. Base line: tax funded, government department. Separation of regulator and service provider is step one; step two would be the embrace of commercial governance principles. The customer relations working group would have been well advised to sit down and think about the implications of this brave new world before committing pen to paper.

Sadly, for ter Kuile, it is case of rooster one day, feather duster the next. From leading the industry to issuing guidelines recommending that all ANSPs behave like government departments in less than 6 weeks. These are certainly turbulent times indeed.

Three issues stand out. First, CANSO is a trade association, with a mandate to represent its members. Not to ensure the delivery of a perfect new world; but to represent its members in this imperfect one, and, at a stretch, perhaps help its members migrate to some brave new one. It should not sacrifice the interests of its members to some Greater Good, whatever that is. Particularly when, apparently, that Greater Good is one defined by but one of the sectors of the airline industry.

Secondly, whatever the motivation of the customer relations committee in pitching its lot so definitively, so comprehensively, with IATA (not IATA's members, note, but IATA itself), CANSO's members need to take this document with a very large grain of salt. Better make that a barrel of salt. There are some very dangerous sentiments here.

The ANSPs are encouraged to provide IATA with all of the data concerning airline usage, and planned usage of the ANSP's facilities, even when the airlines involved are not members of IATA. For a large number of CANSO members it is a simple truth that their largest single customer is not an IATA member. Sometimes more than one of their largest customers are not IATA members. Since when has IATA been entitled to access from third parties to commercially sensitive information regarding its own members, let alone its non-members? What assurances did CANSO extract from IATA regarding how that information would be handled?

Each ANSP is required to name to IATA a principal point of reference for all customer matters. Airlines are 'encouraged' to name a corresponding person. So that is nice and balanced and reciprocal then.

ANSPs are required to set out their investment plans: airlines are 'encouraged' to share theirs with the ANSPs. So that should make serious, intelligent, business planning a walk in the park, too.

If ANSPs are to behave like commercial entities, they have customers. They must treat them accordingly. One at a time. Customers, if that is what the airlines are, want their products for the lowest possible price, free if at all possible, but they also want customer service, efficiency and transparency. And what commercial entities truly offer such services? Only the very best ones.

So, to be the best then should be their goal. Easy. But that is not something that a trade association, any trade association, or agreement between trade associations, can determine. True commercial thinking, true customer service requires exactly the sort of coal-face level thinking and relationships that stand as the definition of the opposite of a trade association.

There is a third important issue here; by linking so closely CANSO's work-programme to that of IATA – essentially finding new ways to cut scheduled airline current costs – there is a danger that other relevant ATM stakeholder interests and issues, especially those of the other users, with long term views, and regulators, with their legislated concern with both improving safety levels and implementing the vital upgrades in the technology, may be put on the back-burner.

We are entering a critical phase of development in the ATM industry when the first global systems are being implemented. The global regulatory framework for these to operate safely and efficiently has yet to be brought to a mature state. These are interesting times.

Regulators, too, need money and expertise if they are to go global. During these current times of recession, efforts need to be redoubled to ensure regulators are properly supported. That is not likely to happen if ANSPs focus entirely on short term cost mitigation. This is an issue where CANSO should be putting its limited resources to work.

There is a vital role for trade associations, and regular readers of the Aviation Intelligence Reporter will acknowledge that we have been complimentary of CANSO in the past. But not this time. The Aviation Intelligence Reporter has also been critical of IATA in the past. But not this time. As far as IATA is concerned, you only get so many patsies in a life time, and when you do, you profit from them. More power to IATA. Is it their fault that CANSO has assumed that they are somehow more important than they are?

But this guideline is not the way to go forward. The nicest thing that these guidelines can be called is 'retrograde'. What they are not is long sighted, or sustainable, or thought through.

CANSO needs to take a long term view, not bow to the requirements of one sector of the airline industry, which sees its members' business model under pressure and, consequently, focuses on the short term. If CANSO is looking for a goal to deliver sustainable lower costs it might do worse than focus on the European Low Cost Carriers Association's Manifesto for Air Traffic Control. Long sighted, sustainable and thought through. Not bad for that sector of the airline industry only focused on cost control. Oh, and representative of the airlines that are often the largest single customer of CANSO's members.

The way forward for air traffic management is complex. It is hard. There are a huge number of competing interests and positions. It will all need to be funded appropriately. The challenges, particularly in Europe, are further complicated by the competing national

interests involved. Inter-operability will be a key concept, so will labour relations; and consolidation. That is what CANSO should focus on.

Economists ask the question: Are airports natural monopolies?

In the last month there has been academic support for the notion, long advocated by this Reporter, that airports are in fact competitive entities, not natural monopolies. This concept is not without controversy. Readers may recall that IATA last year set out that airports are natural monopolies, and thus they called for three of the most dreaded words in English: direct regulatory oversight.

What IATA was actually concerned with, had they analysed their concerns in competition terms, was not whether or not airports are ‘monopolies,’ but whether they have, and abuse, market power. Monopolies, both natural and un-natural, abuse market power, but having market power of itself does not make one a monopoly. It is the abuse of the power that is the issue. Indeed, the copyright and patent systems are based on the notion that temporary, state-sanctioned market power can lead to long-term public good.

But abuse of power is always a tricky subject, and subject to complex moral analysis. Not for nothing is Casablanca considered one of the world’s great movies.

Actually, IATA’s concern is that airport charges are too high. Why is not all that important at the end of the day. Unfortunately for some of IATA’s members, Tae H Oum, of the University of British Columbia and Xiaowen Fu of Hong Kong Polytechnic University, in a paper for the Joint Transportation Research Centre of the Organisation of Economic Cooperation and Development (paper 2008-17; www.internationaltransportforum.org/jtrc/DiscussionPapers/jtrcpapers.html) put forward the view that often, when an airline attempts to maintain an airport as a ‘fortress hub,’ that of itself works against lower prices.

Oum and Fu note that an airport’s revenues include significant retail concessions. Therefore, they need to expand passenger throughput to increase this. That, in turn, reduces any incentive they might otherwise have to exploit their market power vis-a-vis the incumbent airlines.

But the airport/airline relationship will vary, depending on the airport’s function (major connecting hub, spoke airport, seasonal tourism destination) and the balance and make up of its airline tenants. An airport that serves as a fortress hub for a major airline has incentives to make that relationship work well—and that may have negative implications for significant entry by new airlines.

So, what is the best form of regulation? Oum and Fu are economists – put 4 in a room with 3 windows and they will come out with 5 views, so do not expect a clear answer. On balance, they seem to lean towards single-till price caps. But, and this is of interest to those pushing for direct regulatory oversight, ‘in the long run, airports under price cap regulation tend to under-invest in capacity expansion’.

Those are telling words as the UK goes forward with the development of a third runway at Heathrow. Also of interest to both the UK government and BAA is their conclusion that for those cities that have more than one airport, each airport should be under separate ownership.

That is not, of itself, inconsistent with the announcement of the expansion of London Heathrow (a third runway and a sixth terminal). The issue will be getting the focus back on to the much more important issue of appropriate economic regulation of airports. Currently, the issues seem fixated on the much more sexy issues surrounding stopping the work going ahead.

For those interested in protest as a spectator sport, this promises to be a grandstand-burner. You could always have put your house on this being long and hard for BAA, but it seems that Emma Thompson and various others have done exactly that – buying a block of land in the middle of the proposed runway. In the trade, this is known as the Narita Farmer's Manoeuvre. This land is now for sale in centimetre square lots via Greenpeace.

Industry consolidation and the freedom to invest

It is clear that the airline industry is keen to consolidate. Indeed, arguably for many airlines consolidation is one of the few viable strategies the board can think of. But two very major hurdles stand in their way. IATA is working on one. We all need to start thinking about the other.

The first and obvious hurdle to consolidation within the industry, and the need to attract new equity capital are the ownership and control rules that bedevil the airline industry. 'Substantially owned and effectively controlled'. Obviously that sounded like a good idea at the time. But, they were different times.

The second issue is less apparent, but might ultimately be as high a hurdle. Competition law and theory is based largely on the old economy and goods. Airlines are services, and network services at that. There is a significant shortfall in the understanding within the world's anti-trust and competition agencies about the realities of air transport.

For the last twelve months, IATA has been working on the ownership and control issue like never before. It has also attempted to privatise international law; bringing together governments to discuss this issue. It has also drafted, and is circulating, a draft 'multilateral statement of principles' regarding both market access and ownership restrictions.

Word is that the market access issues, such as waiving the various freedoms is not being as well received as looking at the ownership and control issues. To date, airlines have not been put in the same category as, for example, the car industry, but not being able to consolidate and find investors is a clear impediment. That message seems to be getting through.

More troubling is how quickly? There is no sign of the mooted follow up meeting IATA was to convene, which must be a bad sign. Equally confusing are the statements of various analysts that the oil price slump offsets much of the demand slump – as long as you are not tied into hedged oil, anyway.

But the fact remains, even if, as the bean counters say, demand has to slump by 20% to offset oil at USD60 a barrel, airlines are a good buy that still assumes that there is a pool of possible buyers. That is why the ownership and control issues are so important.

But, it is increasingly clear that even if one can find an investor, the competition issues will remain a major hurdle. At the end of January, the European Competition Commissioner put a stake in the ground. Commissioner Neelie Kroes made clear that the economic crisis was not a basis for forgoing rigorous economic analysis of any transaction put before the Commission. That these are extra-ordinary times is not a strong argument, she said.

To rub that point in, the next day, DG Comp announced that it was opening an in-depth investigation of the proposed Lufthansa – Brussels Airline merger. Sadly, in making the announcement, it did so by reference to its detailed city pair analysis. There are a number of assumptions behind city pair analysis, not least of which being that airlines are not network businesses with perishable product. City pairs need to be seen in the context of the network.

Not only do competition authorities seem to have an unhealthy regard for the plight of intermediaries, they also tend to think in terms of widget manufacturers when assessing deals. Airlines have to work harder to show that they need nuanced analysis. That is not easy, and is hard to do when the cannons are roaring in the middle of a transaction, because there is a big risk of being accused of self-interest. That might mean that this is role for the airline associations. Wish them luck.

At a recent seminar in London, a case officer from one of the UK's competition authorities, the Office of Fair Trading, proudly boasted of conditions she had imposed on the Air France – VLM transaction in order to address the issues of the Rotterdam-London leisure market. Both passengers might have been disadvantaged, apparently.

Nothing extraordinary about technical problems in aviation – ECJ

The European Court of Justice has ruled that cancellation of a scheduled flight due to technical problems does not generally fall within the 'extraordinary circumstances' exemption under regulation (EC) No. 261/2004. Consequently, technical issues will not relieve a carrier of its obligation to pay compensation to passengers.

The ECJ found that the occurrence of technical and/or mechanical problems leading to cancellation of scheduled flights is inherent in the normal exercise of aircraft operations. So too, increasingly, are claims by passengers for compensation following cancellation of affected flights.

Mrs. Wallentin-Hermann and her family sought compensation from now insolvent Alitalia following cancellation of a flight from Vienna to Rome on 28 June 2005. Cancellation of the flight was announced to passengers minutes before scheduled departure. The Alitalia aircraft allocated to operate the flight had suffered a serious engine defect. The problem had been discovered the day before during a routine check, and Alitalia had been informed of the defect during the previous night.

The family sought compensation under article 5(1)(c) of regulation (EC) No. 261/2004 (the denied boarding regulation). Alitalia rejected the family's request. The carrier relied on article 5(3) of the regulation, pursuant to which a carrier is absolved from obligation to pay compensation if it can prove that the cancellation was "caused by extraordinary circumstances which could not have been avoided even if all reasonable measures had been taken". The occurrence of the engine defect was, claimed Alitalia, such an extraordinary circumstance.

Unsatisfied by this, Mrs. Wallentin-Hermann brought a successful claim before the Austrian lower court. On appeal by Alitalia, the commercial court in Vienna referred the case to the ECJ for guidance on the scope of the 'extraordinary circumstances' exemption under the regulation.

The concept of 'extraordinary circumstances' is not a defined term in the regulation. Recital 14 in the preamble does set out that '...obligations on operating air carriers should be limited or excluded in cases where an event has been caused by extraordinary circumstances which could not have been avoided even if all reasonable measures had been taken. Such circumstances may, in particular, occur in cases of political instability, meteorological conditions incompatible with the operation of the flight concerned, security risks, unexpected flight safety shortcomings and strikes that affect the operation of an operating air carrier.' Remarkably, Alitalia could not find another basis for a delay in that array of options.

The ECJ found that the resolution of a technical problem caused by failure to maintain an aircraft must be regarded as inherent in the normal exercise of an air carrier's activity. Such problems do not constitute, in themselves, 'extraordinary circumstances'. The onus is on the carrier to show that even if it had deployed all its resources, it would clearly not have been able to prevent the extraordinary circumstances with which it was confronted from leading to the cancellation of the flight.

What this means for carriers operating into and/or within Europe is that generally they can no longer cite technical and/or mechanical problems so as to avoid obligation to pay passengers compensation. They will need to find other reasons – like industrial action. Shouldn't be a big challenge there, even for the new Alitalia. After all, its staff celebrated the re-launch of the airline by going on strike.

2009 – The year of the passenger right

As we foreshadowed last year, the Commission announced a complete review of the application of passenger rights legislation by Member States. It has also announced that it intends making passenger rights one of its focus points for 2009.

This is in response to an announcement by the European Ombudsman that he has opened an investigation into whether the European Commission is fulfilling its responsibility to ensure that EU rules on air passenger rights are properly applied in the Member States.

In turn, this follows a complaint from a German traveller, whose Air France flight from Madagascar was cancelled due to industrial action. He claimed that he received no assistance or compensation from Air France. The responsible French supervisory body also failed to help him. The complainant turned to the Commission. The Commission replied that it would only intervene if there was enough evidence of systemic problems with the implementation of rules on air passenger rights in a Member State. It did, however, invite the complainant to keep the Commission informed about his case.

So now a systemic investigation ensues.

Speaking of which, in the US, both House members and Senators have introduced new bills on this. You have been warned.

The new man at the US DoT: the name is the give away

It is true that often, people's names run with their profession. Mr. Lamb the butcher, Ms. Green the gardener, and so on. Sometimes the names are also a big hint of how things are going to go. Could Bernie Madoff have had a better name if Dickens was writing the story? Or the UK businessman Asil Nadir (of Polly Peck infamy)? BA had some of its best ever years lead by a King and a Marshall. Qantas went from strength to strength under a man called Strong.

So what does the nomination by president-elect Obama of Ray LaHood and his subsequent endorsement as designate for the Department of Transportation tell us? If it is true that all politics is local politics, then that is doubly so in the case of transport: as far as the politicians are concerned, the transport portfolio is actually an infrastructure portfolio – and that is a patch that calls for a lot of local politics indeed. Good to have a man from the 'hood' involved.

And a review of his record shows that Ray LaHood has been neighbourly in his career. He believes in neighbourhood relations. He is a Republican, with a strong record of seeking, and reaching, bi-partisan agreements with the Democrats. He is described as someone who can build a consensus without sacrificing principle. Perhaps of most interest is that whilst he has not been heavily involved in transport matters (he did not sit on the House Transport Committee, for example) he knows a certain amount about infrastructure, having sat on the Appropriations Committee.

And if you look at the public statements regarding transportation policy on the Obama transition team website (www.change.gov) you will see that it is more public works than public transport that will be the main focus of attention. The entire agenda for transport (filed, tellingly, under 'Additional Issues' along with such agenda toppers as Arts, Science and Faith), is:

As our society becomes more mobile and interconnected, the need for 21st-century transportation networks has never been greater. However, too many of our nation's railways, highways, bridges, airports, and neighborhood streets are slowly decaying due to lack of investment and strategic long-term planning. Barack Obama and Joe Biden believe that America's long-term competitiveness depends on the stability of our critical infrastructure. They will make strengthening our transportation systems, including our roads and bridges, a top priority.

Infrastructure first and last. No mention of liberalisation of policy, or interestingly, the environment. Some of the issues for the USA at the moment in air transport are clearly infrastructural. Legislation to upgrade the air-traffic control system has been stuck in Congress for more than a year. So some bi-partisanship will not go astray. There is no doubt that unblocking funding for NextGen will be of huge benefit to aviation around the world, not just within America.

But some issues are policy based rather than infrastructure. The Bush Administration has been fighting airlines over slots and capacity in New York. Ownership and control issues remain significant, as do the other issues surrounding the second phase of the EU-US bi-lateral agreement.

At his nomination hearings, Secretary designate LaHood said little in relation to air transport, but when he did, he focused on two issues. The most important task, he said, is to appoint an effective and dynamic administrator to run the FAA. Secondly, the USA must focus on getting NextGen in place. Aside from that, he noted in response to questions that he will focus on resolving the FAA's difficult labour relations and getting out of the way when private interests want to run airports and other transport infrastructure. He also noted that auctioning slots in New York 'didn't make much sense' if the aim was to reduce congestion.

The FAA spot seemed to be going to the former head of the pilots' union, Duane Woerth, but suddenly the field seems to have opened up with the late appearance of Robert Herbert, transport advisor to Senator Reid, the leader of the Senate. Political connections like that might just trump the labour movement.

By appointing an infrastructure expert to transport, policy issues may be harder to get into the limelight. Or, optimistically, Secretary LaHood may be able to bring fresh eyes and new perspectives. Alternatively, the dominant transport policy voice might be that of Rep James Oberstar, in his role of chairman of the aviation sub-committee of the Transport Committee. His views on transport policy liberalisation are well known, and strident. He is opposed to liberalisation of the ownership and control restrictions for example. Time will tell.

If you have any questions or concerns about any of these matters, please do not hesitate to contact us: info@aviationadvocacy.aero

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