



5017 Iowa Ave
Fort Leonard Wood, MO 65473
Phone: (573) 329-4216
Email: info@flyFLW.com

May 24, 2022

Mr. Michael Martin
U.S. Department of Transportation
Office of Aviation Analysis
1200 New Jersey Ave SE
Washington, DC 20590

Reference: Fort Leonard Wood Essential Air Service, Community Comments

Dear Michael,

This letter constitutes the official comments of St. Robert and Waynesville, representing the Waynesville-St. Robert Regional Airport and the Fort Leonard Wood Army Base, on the matter of Essential Air Service proposals received in response to the Department's March 11, 2022 request for Fort Leonard Wood EAS proposals. This request for proposals was the result of the March 10, 2022, notice of termination of service filed by SkyWest regarding its current EAS contract at Fort Leonard Wood.

In response to the May 11 RFP deadline two carriers offered proposals to provide Fort Leonard Wood EAS, Contour Air and Southern Airways Express.

Southern Airways Express offered two proposals. One would provide 36 round trips per week to St. Louis (STL) with single engine Caravan aircraft. 16,000 annual passengers were forecast on 33,192 seats with a 48% load factor. First year subsidy would be \$3,164,419 with a 2.5% subsidy inflation in the second year. The second proposal would provide 30 round trips per week, split between STL and Nashville (BNA), also with single engine Caravan aircraft. 18,750 passengers are forecast on 27,666 seats with a 68% load factor. First year subsidy would be \$3,709,339 with a 2.5% subsidy inflation in the second year.

The Fort Leonard Wood parties greatly appreciate the interest of Southern Airways Express in serving the Fort Leonard Wood market. However, we do not wish to forfeit our rights to twin engine service in future EAS proceedings and the carrier does not have the appropriate authority to carry DOD military traffic, which accounts for a significant portion of overall airport traffic.

We therefore respectfully decline to endorse the Southern proposal and will not accept it, using our rights to decline single engine service.

Contour Airlines, which did an excellent job serving our market prior to October of 2021, has proposed to provide twelve round trips a week to Nashville (BNA) with 30-passenger



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ERJ regional jets. 22,464 annual passengers are forecast on 37,080 seats with a 60% load factor. First year subsidy would be \$4,449,694 with a 7% escalator in each subsequent year.

We are very familiar with Contour Airlines, and they have the appropriate DOD authority to transport military personnel, a primary component of our overall travel market. We recommend that the DOT contract with Contour for a three year EAS term, beginning from the first day of month Contour service is restored.

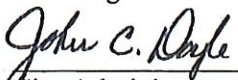
We strongly endorse to the Department the Contour proposal and request expedited review, approval and award of our EAS contract to Contour Airlines. Since filing to terminate the Fort Leonard Wood EAS contract, SkyWest has downgraded our existing service significantly, first with one stop service via Decatur and then, effective in July 2022, reduction to only one round trip per day, with poor timing, again via Decatur.

Fort Leonard Wood requests that the Secretary waive 49 USC 41732(a), requiring basic essential air service be operated as scheduled air transportation. The proposal submitted by Contour Airlines is for public charter service, not scheduled air transportation as defined by the Department. Such a waiver from the Secretary would permit the Department to select Contour under conventional EAS. If the Secretary grants a waiver, we request that it be for a limited period of time, the duration of this EAS contract. We appreciate that a conventional EAS award for public charter service would be a new development for the Department. At the same time, it is critical that the Department quickly review and approve our recommended new air service by Contour Airlines and issue the appropriate order. Therefore, we request the Secretary confirm that such a waiver can be granted by June 10, 2022, in order to expedite EAS contract award. If a waiver cannot be granted by June 10, we intend to apply for Alternate Essential Air Service grant application process and have the application before the Department by June 13, 2022.


Contour has the aircraft time and pilot time available to begin Fort Leonard Wood service very quickly after Department award of the EAS contract.

Thank you in advance for expedited review and approval of our recommendation for Contour Airlines to be awarded the Fort Leonard Wood EAS contract.

Best Regards



City Administrator
City of Waynesville



Mayor
City of Saint Robert