

To Whom It May Concern,

This comment is in response to the “2020-03-08 Order Requesting Proposals” and the “Request for Community Comments” with regards to the recent bidding process for the Grant County Airport contract. I have taken significant time and effort to review, discuss, and formulate an educated opinion of which airline should be selected for the next contract period. All three airlines; Advanced Air, Boutique Air, and Denver Air Connection, have made excellent proposals and provide reliable services to their current EAS communities. This will be a very difficult decision for others in the community, elected officials, and for the DOT. My support goes to Boutique Air Option 2 with 12 round trips to Albuquerque and 12 round trips to Phoenix-Sky Harbor. The evaluation process for my decision can be found below. Thank you to the Department of Transportation for providing these subsidies for critical access to the National Air Transportation System and for allowing comments that will receive weight during the selection process.

DOT Requirements:

I have broken down each of the five requirements, by airline, that the DOT listed in the Order Requesting Proposals (located at the bottom of page 2). My goal is to evaluate all requirements and remain objective to guess how the DOT would go through the same process.

1) Service Reliability:

- a. Advanced Air: The Advanced Air Proposal claims an impressive 99.8% completion rate for the Silver City route with a 96% on time percentage.
- b. Boutique Air: Boutique does not list any performance metrics in their proposal. Utilizing the customer support chat service, a Boutique Air representative relayed my request to a supervisor. The response is that they operate with a 97% completion rate and 80% on time performance, recently.
- c. Denver Air Connection: DAC does not list any performance metrics in their proposal. Using the DAC chat service, a customer service representative said they operate “in the high 90 percentile”.

2) Contractual and marketing agreements with a larger air carrier at a hub

- a. Advanced Air: Advanced does not have any agreements with larger airlines.
 - b. Boutique Air: Boutique has agreements with both American and United in Phoenix and Albuquerque.
 - c. Denver Air Connection: DAC has contractual and marketing agreements with United in Phoenix and Albuquerque.
- 3) Interline agreements with a larger air carrier at the hub
 - a. Advanced Air: Advanced does not have any interline agreements
 - b. Boutique Air: Boutique has a interline with American Airlines, a major carrier in Phoenix, and a full codeshare with United Airlines.
 - c. Denver Air Connection: DAC has an interline agreement with United Airlines. Unfortunately, United has a minor presence in both Albuquerque and Phoenix (only service to other hub locations).
- 4) Community Views
 - a. Advanced Air: Advanced has received significant support from the elected officials and community members utilizing the air service over the last year and a half.
 - b. Boutique Air: Boutique had significant support from the community during the last bidding contract. Unfortunately, elected officials were concerned over reliability during the first quarter in 2018 and chose to support another air carrier. Although Boutique Air proposes a single engine aircraft, it provides the same number of seats as Advanced and is the most reliable aircraft they operate.
 - c. Denver Air Connection: Many communities provide support for their proposals, specifically for their unique jet service, in-flight service, and reliability.
- 5) Whether the air carrier has included a marketing proposal to market the service
 - a. Advanced Air: Advanced “pledges \$50,000 per year to market and grow the ridership at Grant County Airport.” Their plan includes ongoing talks with larger airlines for interline agreements, engagement with the community to bring awareness of the airport and services provided.
 - b. Boutique Air: Boutique will spend at least \$20,000 per year to advertise and market their air service utilizing a combination of outlets to increase awareness.

- c. Denver Air Connection: DAC will budget a minimum of \$20,000 to create awareness and promote utilization of their air service.

Community Requirements

The following criteria is what many communities value for local air service.

1) Safety

- a. Advanced Air: Advanced has a flawless safety record. They are registered with the Air Charter Safety Foundation and BARS Flight Safety.
- b. Boutique Air: Boutique recently had an accident with one of their aircraft in Dallas on a non-scheduled flight with one injury to a crewmember. The company has received certifications from ARG/US and Wyvern for their safety record. They promote their pilots high experience and advanced FAA rating for their near perfect safety record.
- c. Denver Air Connection: DAC promotes safety by “maintaining a Safety Management System that is integrated into every aspect of [their] operation.” While DAC has a perfect safety record, the parent company (Key Lime Air) had multiple incidents utilizing their Fairchild Metroliner series.

2) Reliability – Already discussed above

3) Customer Service

- a. Advanced Air: Advanced has a reservation line; each location has a station phone and dedicated email address for any questions or concerns.
- b. Boutique Air: Boutique provides 24/7 customer service utilizing their reservation phone number or live chat service via their web site. There is a feedback form if additional assistance is required and they are active on most social media platforms. Boutique also provides additional compensation for delays/cancellations under their control.
- c. Denver Air Connection: DAC has a customer service line and information email. Additionally, there is a live chat service for any quick questions or concerns.

4) Schedule

- a. Advanced Air: Advanced proposes 22 round trips to Albuquerque/Phoenix for Option 1 and 24 for Option 2.

- b. Boutique Air: Option 1 provides 17 RT to ABQ and 7 RT to PHX. Option 2 provides 12 RT to ABQ and 12 RT to PHX.
- c. Denver Air Connection: DAC only submitted one option for 18 round trips to Albuquerque/Phoenix.

It is important to note that in the Order Requesting Proposals, the Department of Transportation **clearly** listed a specific requirement that expects air carriers to deliver proposals consistent with the current service. Either **24** weekly round trips with 8-9 seat aircraft or **12** round trips with 30 to 50 seat aircraft. Advanced Air option 1 provides less service than currently provided and will not be considered further. Denver Air Connection's only option proposed more round trips than the DOT will subsidize and will not be considered further. I will only be considering Advanced Air Option 2 and both Boutique Air options in my evaluation.

My Evaluation

Both Advanced Air and Boutique Air have historically provided a high level of safety, reliability, and customer service, the core fundamentals of any airline. To decide, I will have to consider factors other than the DOT requirements to make a recommendation. I believe that the recent COVID-19 pandemic provides a great evaluation for how airlines respond, and thus the results of their actions.

COVID-19 Response

Advanced Air immediately made dramatic changes to their schedule. They stopped overnighing their aircraft at Grant County Airport, moved the flights significantly earlier in the day and stopped providing multiple, daily round trips to Phoenix. Their aircraft now overnight in Phoenix, which means they must make an early departure (scheduled 6:30 a.m.) to arrive in Silver City by 8:00 a.m. The remainder of the schedule can be found below:

Due to COVID19 we are extenting our temporary schedule.

Phoenix to Silver City -	6:30am - 8:36am
Silver City to Albuquerque -	9:05am - 10:05am
Albuquerque to Silver City -	10:35am - 11:35am
Silver City to Albuquerque -	12:05pm - 1:05pm
Albuquerque to Silver City -	1:35pm - 2:35pm
Silver City to Phoenix -	3:05pm - 3:17pm

I will note that it is impossible to make a day trip to either ABQ or PHX with this schedule, as the first flight to Silver City arrives in ABQ at 10 a.m. and the last flight to SVC leaves at 1:35 p.m. (maximum of three hours in ABQ). Additionally, the Phoenix flight departs late in the day, when larger air carriers have completed most of their flights (limiting access to the National Air Transportation System), and there is no possibility of making a day trip. Advanced has maintained the same, high ticket prices as before, which makes it difficult to stimulate demand in a low-income region. Fares to Phoenix start at \$118.25 and fares to Albuquerque start at \$84.93. Many people find it cheaper and more convenient to drive to either ABQ or PHX. To increase consumer confidence, Advanced is providing hand sanitizer and face masks upon request, implemented additional cleaning procedures between flights, and trained crew members to recognize symptoms.

Boutique Air has taken similar steps with regards to consumer confidence. However, at every EAS community, Boutique continues to overnight their aircraft in the community to provide early departures for convenient connections with larger air carriers. Additionally, they have maintained the same or similar schedules at all locations to ensure business and essential travelers can make convenient trips to larger cities. As mentioned in the Boutique Air Proposal, prices will be kept low to stimulate demand with fares starting at \$59 to both Phoenix and Albuquerque.

The results of each airlines actions are clear when comparing the [enplanements](#) for the Silver City to Albuquerque route, operated by Advanced Air, to the Carlsbad, NM to Albuquerque routes, operated by Boutique Air. In the month of April, Advanced Air flew 26 passengers to

ABQ, whereas Boutique Air flew 85 passengers. Advanced Air lost 92.1% of passengers, where Boutique only lost 62.3% of customers.

Airline Location

Boutique Air also has a more convenient location for connecting flights by operating out of the sterile area of Terminal 3. Although inbound passengers (to PHX) cannot enter due to a lack of security operations in Silver City, customers are let through a side door directly adjacent to the PHX SkyTrain. This will provide a seamless connection to Terminals 3 and 4, the East Economy Lots, 44th Street Station. When the SkyTrain Phase 2 project is complete, there will be very convenient transportation to the future West Ground Transportation Center and the consolidated Rental Car Center. Furthermore, inbound passengers can receive flow through ticketing and baggage tags for a larger air carrier (using the interline agreements). While bags cannot transfer out of Silver City, having the tickets printed and bags tagged means passengers can get off the BTQ aircraft in PHX, take the SkyTrain to terminal 4, drop off checked luggage, and head straight to the gate. Outbound passengers (from PHX) **can** have their bags transfer from the origin all the way to Silver City. Additionally, these travelers can enjoy a much more convenient experience with clearly marked terminal buildings (easy to find driving to the airport), significantly more shopping and dining choices, and additional services (wheelchair, baggage service, self-service check in, etc.). Connecting passengers on United will not need to re-clear security. American Airlines passengers will need to re-clear, however, the SkyTrain expedites the process significantly.

Advanced Air operates out of a private FBO (Swift Aviation). I have personally seen the negative effects this has on customers starting with the lack of ground transportation options. There are very limited parking spaces, expensive valet costs (opposite side of the FBO), ride-share options are often difficult to get (and not everyone feels comfortable with these apps). There is also a lack of dining or additional services (especially with long layover between connecting flights). Furthermore, shuttle times are limited throughout the day, so many people are forced to wait many hours until they can get to the FBO. This FBO can also be difficult to find due to a lack of signage from the freeway, and even on local roadways.

Schedule

The schedule Advanced Air proposes is nearly \$1 million more expensive than their current contract for the **exact** same level of service being provided. (Option 1 is nearly the same increase in subsidy for less service than currently provided).

The schedule Boutique Air proposed provides a lower subsidy than the current contract, using the reliable single engine PC12, with two options for 24 round trips. Option 1 is the same frequency of trips to ABQ and PHX, respectively. This will provide 3 round trips (RT) to ABQ and 1 RT to PHX every day. Option 2 provides 2 RT to ABQ and 2 RT to PHX every day. This option will be highly convenient for business travelers who need to make day trips to either city. Additionally, more flights to Phoenix will allow more connection opportunities with the larger carrier (American Airlines) and will result in an increase in enplanements. Boutique has been known to add additional, unsubsidized flights to communities that maintain high load factors (such as Pendleton, Merced and Alamosa). They also added additional weekend flights to multiple communities to maintain the same schedule over the weekend. If Boutique is selected for Option 2, they can provide the schedule requested by the community and add an additional flight to ABQ if certain days are busier than others.

Additional Services

Early this year, Boutique Air became the only part 135 commercial operator to have a flow through program with a legacy carrier, United Airlines. The ability to attract additional pilots looking to make their way to the captain's seat of a large aircraft will further improve Boutique's reliability. Finally, Boutique Air provides a highly convenient rental car division at multiple communities where there are no other options. There are very few ground transportation options (even less than the FBO in PHX). Having the rental car service [again](#) will boost enplanements and attract additional tourists that might have changed to another airport that provides ground transport (such as El Paso). Additionally, I have heard from friends in Carlsbad that Boutique Air will provide one-way rental cars to Albuquerque if there are irregular operations (weather or maintenance). Although both airlines provide a high completion rate and impressive on time metrics, having rental cars as a backup plan is an important feature for the airport.

To conclude, I support Boutique Air Option 2 for a two-year contract at Grant County Airport. Boutique provides an impressive level of customer service, dedication to improving each community and adding additional services to make air transport more attractive to potential customers. Once again, thank you to the Department of Transportation for offering the opportunity to input our thoughts on this contract and for taking my support into consideration.