



June 22, 2022
Mr. Scott Falk
U.S. Department of Transportation
EAS & Domestic Analysis Division
1200 New Jersey Ave., SE
Washington, DC 20590

Reference: Greenbrier Essential Air Service DOT-OST-2005-20736 and Order 2022-3-8

Dear Mr. Falk,

Background – This letter constitutes the official comments of Greenbrier Valley Airport Board, which is the official governing body of the airport (LWB), on the matter of Essential Air Service (EAS) proposals received in response to the Department's March 11, 2022 request for Greenbrier service proposals. The request for proposals was the result of the March 10, 2022, notice of termination of service filed by SkyWest Airlines regarding its current EAS contract at Greenbrier.

In response to the May 11 RFP deadline, four carriers; Boutique Air, Contour Air, Southern Airways Express and Team Tundra, offered a proposal to provide Greenbrier EAS.

Summary of EAS Proposals – Boutique Air's proposal would provide 30 weekly round trip flights between Greenbrier and either Baltimore (BWI) or Washington Dulles (IAD), using single engine 8-passenger PC-12 aircraft. 27,800 annual passengers are forecast on approximately 27,000 annual seats with a load factor of 103%. First year subsidy would be \$5,541,881 for BWI and \$5,144,086 for IAD with a 2% subsidy inflation in year two of service.

Southern Airways Express offered three proposals, all operated with 9-passenger Caravan single engine aircraft.

Option A called for 24 weekly round trips to Dulles, 16,000 annual passengers, a 72% load factor and a first-year subsidy of \$3,029,059 with a 2.5% second year subsidy inflation.

Option B called for 30 weekly round trips to Dulles, 19,000 annual passengers, a 69% load factor and a first-year subsidy of \$3,481,909 with a 2.5% second year subsidy inflation.

Option C called for 36 weekly round trips to Dulles, 22,500 annual passengers, a 68% load factor and a first-year subsidy of \$3,912,740 with a 2.5% second year subsidy inflation.

Contour Airlines offered 12 weekly round trips to Charlotte, operated with a 30-seat regional jet. 24,336 annual passengers are forecast on 37,440 seats with a 65% load factor. First year subsidy would be \$5,971,353 with a 7% annual subsidy inflation.

The Team Tundra EAS proposal was devoid of facts, data and substance. There was no forecast of operations, traffic or subsidy requirements.

SkyWest Option - The Airport Board also considered the option of allowing incumbent EAS provider SkyWest Airlines to rescind its EAS termination notice based on SkyWest's suggestion to Greenbrier that it would pair Greenbrier service with Shenandoah effective this summer for an indefinite period. This proposal also included the plan that eventually SkyWest would restore Greenbrier service to two round trips to United hubs, using a FAA Part 135 30-seat regional jet

operated under DOT Part 380 Public Charter rules. We greatly appreciate the service SkyWest has provided us the past few years.

Analysis of New Service Proposals – The Airport Board conducted a careful analysis of the four air service proposals plus the option of remaining with SkyWest pending their roll out of the 30-seat regional jet product.

The Boutique Air and Southern Airways Express proposals are all single engine service proposals, and we decline, at this time, to waive our rights to twin engine service.

The Team Tundra proposal is incomplete and cannot be evaluated.

The SkyWest proposal to restore Greenbrier to two nonstop round trips at some future date with an undefined Part 135/Part 380 product is difficult to evaluate because there is no detail on what the product will look like in terms of code share, ticket and bag agreement, pricing and hub route. There is also no timeline as to when that product would replace the current reduced service of one round trip to Chicago and one to Dulles with all flights paired with Shenandoah.

Contour has provided outstanding service to eight EAS cities (ten effective July 1), including Parkersburg and Beckley in West Virginia. The Charlotte hub of American Airlines is the second largest on the east coast, trailing only Delta at Atlanta. Contour has a ticket and bag agreement with American.

Recommendation – The Greenbrier Valley Airport Board respectfully declines the Boutique and Southern Airways Express single engine service proposals. We will not, at this time, waive our rights to twin engine service. The Team Tundra proposal is rejected as incomplete.

We strongly considered recommending the retention of the existing, reduced SkyWest service pending the roll out of the new SkyWest Part 135/Part 380 30-seat air service product. SkyWest has done a wonderful job serving our market for more than five years.

However, the SkyWest future service product remains ill-defined. The Contour services at Parkersburg and Beckley are well defined and well received by both communities.

Therefore, we recommend to the DOT that Contour Airlines be designated our new EAS carrier and that a DOT Order to that effect be issued as quickly as possible so the carrier can assume our EAS on or before October 1, 2022.

We have guidance to request a waiver in order for our EAS contract award to Contour to be via conventional EAS regulations. Therefore, Greenbrier requests that the Secretary waive 49 USC 41732(a), which states that basic EAS is scheduled air transportation. The proposal submitted by Contour Airlines is for public charter service, not scheduled air transportation as defined by Department's regulations. 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 moving this process through via conventional EAS is not standard procedure. 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 grant the aforementioned waiver promptly, in order to expedite EAS contract award. If a waiver cannot be granted promptly, we will pivot to the more conventional AEAS grant application process and have the application before the Department as soon as possible.

Thank you for your ongoing efforts to support small community air service and for providing this opportunity to comment on proposals to provide airline service to the Greenbrier Valley Airport.

Sincerely,



Deborah Phillips
Board Chairperson
Greenbrier County Airport Authority
Greenbrier Valley Airport



June 22, 2022
Mr. Scott Falk
U.S. Department of Transportation
EAS & Domestic Analysis Division
1200 New Jersey Ave., SE
Washington, DC 20590

Reference: Greenbrier Essential Air Service DOT-OST-2005-20736 and Order 2022-3-8

Dear Mr. Falk,

Background – This letter constitutes the official comments of Greenbrier Valley Airport Board, which is the official governing body of the airport (LWB), on the matter of Essential Air Service (EAS) proposals received in response to the Department's March 11, 2022 request for Greenbrier service proposals. The request for proposals was the result of the March 10, 2022, notice of termination of service filed by SkyWest Airlines regarding its current EAS contract at Greenbrier.

In response to the May 11 RFP deadline, four carriers; Boutique Air, Contour Air, Southern Airways Express and Team Tundra, offered a proposal to provide Greenbrier EAS.

Summary of EAS Proposals – Boutique Air's proposal would provide 30 weekly round trip flights between Greenbrier and either Baltimore (BWI) or Washington Dulles (IAD), using single engine 8-passenger PC-12 aircraft. 27,800 annual passengers are forecast on approximately 27,000 annual seats with a load factor of 103%. First year subsidy would be \$5,541,881 for BWI and \$5,144,086 for IAD with a 2% subsidy inflation in year two of service.

Southern Airways Express offered three proposals, all operated with 9-passenger Caravan single engine aircraft.

Option A called for 24 weekly round trips to Dulles, 16,000 annual passengers, a 72% load factor and a first-year subsidy of \$3,029,059 with a 2.5% second year subsidy inflation.

Option B called for 30 weekly round trips to Dulles, 19,000 annual passengers, a 69% load factor and a first-year subsidy of \$3,481,909 with a 2.5% second year subsidy inflation.

Option C called for 36 weekly round trips to Dulles, 22,500 annual passengers, a 68% load factor and a first-year subsidy of \$3,912,740 with a 2.5% second year subsidy inflation.

Contour Airlines offered 12 weekly round trips to Charlotte, operated with a 30-seat regional jet. 24,336 annual passengers are forecast on 37,440 seats with a 65% load factor. First year subsidy would be \$5,971,353 with a 7% annual subsidy inflation.

The Team Tundra EAS proposal was devoid of facts, data and substance. There was no forecast of operations, traffic or subsidy requirements.

SkyWest Option - The Airport Board also considered the option of allowing incumbent EAS provider SkyWest Airlines to rescind its EAS termination notice based on SkyWest's suggestion to Greenbrier that it would pair Greenbrier service with Shenandoah effective this summer for an indefinite period. This proposal also included the plan that eventually SkyWest would restore Greenbrier service to two round trips to United hubs, using a FAA Part 135 30-seat regional jet

operated under DOT Part 380 Public Charter rules. We greatly appreciate the service SkyWest has provided us the past few years.

Analysis of New Service Proposals – The Airport Board conducted a careful analysis of the four air service proposals plus the option of remaining with SkyWest pending their roll out of the 30-seat regional jet product.

The Boutique Air and Southern Airways Express proposals are all single engine service proposals, and we decline, at this time, to waive our rights to twin engine service.

The Team Tundra proposal is incomplete and cannot be evaluated.

The SkyWest proposal to restore Greenbrier to two nonstop round trips at some future date with an undefined Part 135/Part 380 product is difficult to evaluate because there is no detail on what the product will look like in terms of code share, ticket and bag agreement, pricing and hub route. There is also no timeline as to when that product would replace the current reduced service of one round trip to Chicago and one to Dulles with all flights paired with Shenandoah.

Contour has provided outstanding service to eight EAS cities (ten effective July 1), including Parkersburg and Beckley in West Virginia. The Charlotte hub of American Airlines is the second largest on the east coast, trailing only Delta at Atlanta. Contour has a ticket and bag agreement with American.

Recommendation – The Greenbrier Valley Airport Board respectfully declines the Boutique and Southern Airways Express single engine service proposals. We will not, at this time, waive our rights to twin engine service. The Team Tundra proposal is rejected as incomplete.

We strongly considered recommending the retention of the existing, reduced SkyWest service pending the roll out of the new SkyWest Part 135/Part 380 30-seat air service product. SkyWest has done a wonderful job serving our market for more than five years.

However, the SkyWest future service product remains ill-defined. The Contour services at Parkersburg and Beckley are well defined and well received by both communities.

Therefore, we recommend to the DOT that Contour Airlines be designated our new EAS carrier and that a DOT Order to that effect be issued as quickly as possible so the carrier can assume our EAS on or before October 1, 2022.

We have guidance to request a waiver in order for our EAS contract award to Contour to be via conventional EAS regulations. Therefore, Greenbrier requests that the Secretary waive 49 USC 41732(a), which states that basic EAS is scheduled air transportation. The proposal submitted by Contour Airlines is for public charter service, not scheduled air transportation as defined by Department's regulations. 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 moving this process through via conventional EAS is not standard procedure. 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 grant the aforementioned waiver promptly, in order to expedite EAS contract award. If a waiver cannot be granted promptly, we will pivot to the more conventional AEAS grant application process and have the application before the Department as soon as possible.

Thank you for your ongoing efforts to support small community air service and for providing this opportunity to comment on proposals to provide airline service to the Greenbrier Valley Airport.

Sincerely,



Deborah Phillips
Board Chairperson
Greenbrier County Airport Authority
Greenbrier Valley Airport