



Tradewind Aviation, LLC
Waterbury-Oxford Airport
5 Juliano Drive
Oxford, Connecticut 06478

phone 203.267.3305
fax 203.267.3310
toll free 800.376.7922

April 2, 2020

The Honorable Joel Szabat
Assistant Secretary of Aviation and International Affairs
U.S. Department of Transportation
1200 New Jersey Avenue, SE
Washington DC 20590

Re: Docket DOT-OST-2020-0037 – OBJECTION AND COMMENTS

Dear Assistant Secretary Szabat,

Tradewind Aviation, LLC (Tradewind) respectfully objects to the above-referenced Order to Show Cause proposing to impose minimum air service continuation requirements on CARES Act recipients.

Tradewind is extremely appreciative of the Administration and Congress having enacted the CARES Act so quickly and of the Department's efforts in helping support this effort.

Tradewind operates only seasonal service on the routes listed in the Order yet the Order obligates that service on a year-round basis. Because of this, the Order obligates Tradewind to continue service when it would not otherwise have done so in the pre-COVID environment, causing even further detriment to Tradewind's financial position and is contrary to the public interest of keeping airline employees at work

Tradewind respectfully requests that the Order be amended to account for seasonal and non-daily operations by allowing the previous year's operations serve as the baseline for measuring the minimum service obligations and taking an appropriate reduction from that point.



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Furthermore, the Order obligates Tradewind to serve locations that are currently subject to a stay at home order. Tradewind respectfully requests that the order be modified to suspend the service obligation when either point is subject to such a stay at home order.

Forcing Tradewind to serve communities that would otherwise not have service and/or serve communities that actively discourage travel is contrary to the intent of the CARES Act and contrary to the interest of greater public health.

Again, I thank all concerned for their diligent work in such trying times. Tradewind is committed to playing a role in getting our country back to work and travelling and we look forward to making that happen.

Sincerely,

Eric Zipkin
President