

**Town of Islip, Long Island MacArthur Airport (ISP)
Application Under Small Community Air Service Development Program
Docket DOT-OST-2022-0003**

BEFORE THE
DEPARTMENT OF TRANSPORTATION
OFFICE OF THE SECRETARY
WASHINGTON, D.C.

Application of
Town of Islip, NY, Long Island MacArthur Airport
for a Small Community Air Service Development Program Grant

Docket DOT-OST-2022-0003

MOTION OF TOWN OF ISLIP, NY
TO WITHHOLD INFORMATION FROM PUBLIC DISCLOSURE

Communications with respect to this document should be sent to:

Shelley LaRose-Arken
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Long Island MacArthur Airport
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March 14, 2022

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Pursuant to 14 C.F.R. § 302.12 (“Rule 12”), the Town of Islip, NY (“Town”) hereby moves to withhold from public disclosure Letters of Intent and Support from two airlines that would otherwise have been included on pages 25 and 26 of the Town’s Application Under Small Community Air Service Development Program, Docket DOT-OST-2022-0003 (“Application”).

The following documents are being filed with this Motion in a sealed envelope marked “Confidential Submission of the Town of Islip in Docket DOT-OST-2022-0003/Confidential Treatment Requested Under § 302.12”:

Letter of Support from Airline A in support of the Town of Islip, Long Island MacArthur Airport (“ISP”) Application Under Small Community Air Service Development Program, Docket DOT-OST-2022-0003

Market Analysis of the proposed new non-stop route

The information the Town seeks to withhold from public disclosure meets the requirements for exemption from public disclosure under the Freedom of Information Act, 5 U.S.C. § 552(b)(4), for the following reasons:

1. The information is commercial in nature. The Letter of Support includes information concerning future route plans and marketing practices of Airline A. The Market Analysis provides competitive and other insight about ISP and the proposed new non-stop route.

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2. The information was obtained from persons outside the government. The Letter of Support was sent by Airline A, a private airline. The Market Analysis was performed by a private company incorporating certain proprietary, non-public-sector data.

3. The information is privileged or confidential. It is not the type of information usually released to the public and, if released, would cause substantial harm to the competitive position of the entities from whom the information was obtained. The airline provided its Letter of Support to the Town with the understanding that the Town would take reasonable and necessary steps to safeguard the confidentiality of the information it provided.

The Letter of Support comes from a senior leader at Airline A who has direct input to and influence over route planning decisions at the airline. The letter describes Airline A's intent to expand air service to and from ISP, and disclosure of that information could be used by competitors to prepare a competitive response before the airline is prepared to publicly announce a new route. Premature public disclosure of the contents of airline's Letter of Support could cause irreparable harm to its plans and could jeopardize either the realization or the success of such service.

The release of this information would cause substantial harm to the interests of the Town and ISP. For the reasons explained above, the release of this information would harm the airline from whom the information was obtained. The Town maintains a business relationship with this airline and key to the success of that relationship, and thereby the Town's Application, is maintaining the confidentiality of such information on the airline's behalf.

The Town therefore requests that the documents listed in the below Index of Attachments be afforded confidential treatment by the Department.

Submitted by,



Shelley LaRose-Arken
Airport Commissioner

Index of Attachments:

- Letter of Support from Airline A
- Market Analysis of the Proposed New Non-stop Route