

## SHREVEPORT AIRPORTS TENANT ADVISORY COMMITTEE

Chairman Margaret Shehee  
Members of the Board  
Shreveport Airport Authority

April 9, 2018

SUBJECT: Proposed Updates to Downtown Airport Minimum Standards

Ladies and Gentlemen:

We, the undersigned, are the five representatives elected by our fellow tenants at the Shreveport Airports, and appointed by the Honorable Ollie Tyler, Mayor of Shreveport, to work with the Shreveport Airport Authority in the resolution of issues that have arisen between the airport management and the tenants. We believe the Shreveport Airports represent one of the largest Public-Private Intergovernmental Partnership efforts in our City. As such, effective two-way communication between management and customers is essential.

We respect the Airport Authority's responsibility to regulate activities at the airports, and maintain accurate records of who is conducting those activities. We also recognize the need to generate revenue to fund the airports and to comply with FAA mandates, guidelines and regulations. After research and consultation, however, we believe that some of the proposed updates to the Downtown Airport Minimum Standards will damage that partnership, and have unintended consequences to the long-standing positive relationship between the City and the private sector.

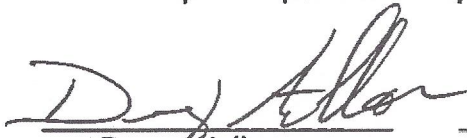
Although we each have our own unique perspectives and interests in airport operations, we are unanimous in our expression of concern about two of the proposed changes:

First, proposed update number three focused on Page 18: "Non-compliance with Minimum Standards" is not fully developed and clarified. As this is now presented we have few details about exactly who would have the authority to determine an entity "fails to comply," how "notification" of this finding would be communicated, and what mechanism "allows the Airport to issue a fine up to \$500.00." With the specter of a "third infraction of any kind can result in the lease being considered in default" hanging over the head of every tenant, the lack of these details, and the complete absence of any process of adjudication, arbitration, or appeal opens this up for discriminatory selective enforcement, or arbitrary application.

Second, the reference to the FAA "Hangar Use Policy effective July 1, 2017" only by its date in proposed update number four to Page 23, Section 4.14 "Hangar Space" doesn't do justice to the substance and importance of this change. For background, at federally obligated airports around the nation the storage of non-aeronautical items such as automobiles, motorcycles, RV's, bass-boats, and home-builts has been a source of continuing conflict between airport managers and tenants. After a lengthy rule making and public comment process the FAA has sided with the tenants permitting "non-aeronautical items to be stored in hangars provided the items do not interfere with the aeronautical use of the hangar." Federal Register / Vol. 81, No. 115 / Wednesday, June 15, 2016 / Rules and Regulations at Page 38910, Final Policy, Section II.c. This was a major relaxation of the pre-existing harsh guidance.

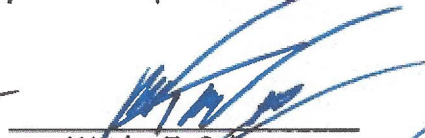
As much as this subject has been a cause for contention, the tenants of our Airports deserve to be informed of what is really being done here. The gist of the change can be communicated in one sentence, quoted above, from the Policy. Even better, the entire two page policy can be attached as an Appendix to the Minimum Standards. This way everyone would have a clear idea of what the current rules are that are being enforced.

Thank you in advance for your consideration and the opportunity to work with you and the Shreveport Airport Authority on this important endeavor.



---

Danny Aiello



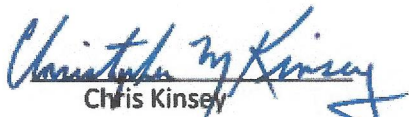
---

Wyche T. Coleman



---

James Graves



---

Chris Kinsey



---

Mike Stanberry