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OST-00-7668-45
OST-03-14985-9



**U.S. Department of
Transportation**
Office of the Secretary
of Transportation

OFFICE OF REGISTRATION
AND CERTIFICATION
400 Seventh St., S.W.
Washington, D.C. 20590
2003 OCT -1 P 2:46

September 30, 2003

Mr. Nathaniel P. Breed, Jr.
Zuckert Scoutt & Rasenberger
888 Seventeenth Street, N.W.
Suite 700
Washington, DC 20006-3309

Dear Mr. Breed:

I am currently reviewing Supplement No. 8 to Boston-Maine Airways, Corp.'s (Boston-Maine) application for interstate scheduled authority using large aircraft (Docket OST-00-7668), filed on August 8, 2003, as well as Supplement No. 2 to Boston-Maine's application for foreign scheduled authority (Docket OST-03-14985), also filed on August 8. Before I can complete my review of these documents, I will need additional and/or clarifying information. Specifically, please address the following:

1. According to the Federal Aviation Administration (FAA), Boston-Maine's current Pre-application Statement of Intent shows its intent to add only one Boeing 727 (B-727) airplane. Has Boston-Maine requested FAA approval to operate a total of seven B-727 airplanes in domestic and foreign operations? If so, please provide a copy of the amended request, including the date that Boston-Maine submitted this request. If not, please indicate when Boston-Maine intends to submit its request and explain why Boston-Maine has not yet submitted it to FAA.
2. In its August 8 supplement, Boston-Maine states that Mr. William Davidson was hired as B-727 Fleet Manager on March 17, 2003. According to a resume for Mr. Davidson filed in Supplement No. 7, Mr. Davidson has been working for Boston-Maine since 2002. Please explain the different dates for Mr. Davidson's employment.
3. In its August 8 supplement, Boston-Maine states that Mr. Frank Doglione was hired as B-727 Fleet Training Manager, on August 5, 2003. Mr. Doglione's resume indicates that he is residing in Florida and presently working for both Boston-Maine and Aeroservice. Does Mr. Doglione intend to continue to reside in Florida and work for both entities? If so, how will he divide his time between his duties with both companies? Also, how will he perform his duties for Boston-Maine given his location in Florida while Boston-Maine's operations are based in New Hampshire? If Mr. Doglione has terminated his employment with Aeroservice, please provide the termination date.

4. According to FAA, Boston-Maine's Vice President of Maintenance has departed recently. Has Boston-Maine filled this vacancy? If Boston-Maine has filled this position, please provide a resume for the new employee. If not, please indicate when Boston-Maine intends to fill this vacancy.
5. We continue to be concerned about Mr. Gordon Long holding both the position of Vice President and Director of Operations given his lack of B-727 qualifications. Please state why we should allow Boston-Maine to operate up to seven B-727 airplanes with Mr. Long holding both of these key positions.
6. As we noted in our July 29, 2003, letter, several of Boston-Maine's senior management and technical personnel appear to have joined the company prior to its April 18, 2003, filings, yet Boston-Maine did not note these changes in those filings. In response to our questions regarding this matter, Boston-Maine stated that its failure to mention these changes was "an inadvertent oversight attributable to its primary focus on [its] first-year plan and related traffic, revenue, and expense projections in that [April 18] filing." We find this oversight troubling in that Boston-Maine was on notice through our discussion in Order 2002-12-20 that we had serious concerns regarding its managerial capabilities. Further, not only did Boston-Maine fail to advise us of changes in its management staff, but it specifically told us that no such changes had occurred. This "inadvertent oversight" by itself, therefore, raises additional concerns about Boston-Maine's managerial capabilities. Therefore, please identify the individual who was responsible for the portion of Boston-Maine's April 18, 2003, filing that dealt with its management and technical personnel and explain in detail why this individual did not know of the changes or did not believe it was necessary to advise us of them.
7. Has Boston-Maine at all times been in full compliance with its obligations for passenger facility charge (PFC) collection, remittance, reporting and auditing under the FAA's applicable PFC regulations (14 CFR Part 158). If not, state the extent to which it has not been in compliance and discuss any steps it has taken to rectify past any problems.

Please provide a complete response to the above within 21 days of the date of this letter. As always, please remember to accompany your response with the certification required by Title 18.

Thank you for your cooperation in this matter. If you have any questions regarding this letter or the requested information, please feel free to contact me at (202) 366-2999.

Sincerely,



Vanessa R. Wilkins

Transportation Industry Analyst
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cc: Dockets OST-00-7668 and OST-03-14985

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