

Air Currents

NEW YORK AVIATION MANAGEMENT ASSOCIATION • VOL. 7 NO. 1 • SPRING / SUMMER 2005

NYAMA Attention Turns to Legislative Concerns

Bond Act, DOT Transformation and Sales Tax Relief

The past several months have seen activity heat up in Albany with respect to aviation-related and general legislative concerns. NYAMA has been on the forefront communicating our position and goals to the Governor's office, State Legislature, and Department of Transportation.

Advocacy Day

NYAMA held another successful annual Advocacy Day on March 8. In spite of inclement weather, a number of members were able to attend and actively participate in the day's events.

The day began with an overview of the Association's legislative concerns by Rich Halik, NYAMA President. Rich also discussed the status of the budget as it relates to aviation. Members spent the day meeting with State legislators and bringing aviation concerns to their attention.

NYAMA identified the following legislative priorities for this legislative session:

- Seek new state aid program for general aviation and commercial service airports in the new multi-year transportation capital plan.
- Seek allocation of DOT resources and funding to support non-AIP funded airport unmet needs. This concern has been elevated as a result of the proposed reduction in federal AIP funding from \$3.6 billion to \$3.0 billion (a projected impact of \$26.2 million to New York State).
- Support legislation to exempt the purchase of non-commercial service aircraft from NYS sales tax. This is an extension of the victory achieved last year with the sales tax relief for repair and maintenance of general aviation aircraft.
- Preserve state \$8 million matching share of Federal Airport Improvement Program funds.
- Seek inclusion of GA and commercial service aviation eligibility in the Strategic Partnership for Upstate Resurgence [Operation SPUR] advanced by the Governor. SPUR is a new economic development program proposed by the Governor.

Later in the day, NYAMA hosted its annual legislative reception, which was well attended by

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FAA Forecasts

Passenger Levels to Top One Billion in the Next Decade

Passenger Volume Back to Pre-2001 Levels

The number of people flying in the United States will return to pre-2001 levels this year, with an average annual growth rate of 3.4 percent expected over the next 12 years, according to the annual 12-year aviation forecast report released by the U.S. Department of Transportation's Federal Aviation Administration (FAA).

According to FAA Aerospace Forecasts Fiscal Years 2005-2016, last year 688.5 million flew on U.S. commercial air carriers. By 2015, the number of passengers is expected to top one billion.

"Deregulation has delivered a dynamic industry where consumers are driving change. Airline customers have more options, at lower fares, based on more timely information, than ever before — and our economy is better off as a result," said U.S. Secretary of Transportation Norman Y. Mineta.

"The FAA is committed to keep

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Rich Halik
President

Word on the Wing

*From the
President*

Dear Friend of Aviation:

It's hard to believe we're already half-way through the year. It's been a busy first half for NYAMA, and looks to be just as busy for the remainder of the year.

As is typically the case, legislative concerns dominated the Association's to-do list for the first several months of the year. However, new concerns and new political dynamics have made this year's advocacy efforts a little different than in recent years.

New Yorkers have become accustomed to budget-related advocacy extending through the summer months. Under increasing public pressure to honor the State's constitutional April 1 budget deadline, the Governor and legislative leaders pushed hard to pass the first on-time budget in 20 years.

One might think the passage of an on-time budget meant NYAMA's advocacy efforts would slow down significantly. Two key issues have kept this from happening: the proposed transportation bond act, and the Department of Transportation transformation process. Both issues have kept NYAMA alert and active in seeking the best welfare for New York's aviation community, and both issues promise to keep us involved throughout the summer months. I encourage you to read the cover article for a full review of the Association's legislative activities.

NYAMA is also working on several other fronts to help meet the needs of New York aviation.

The training committee has been working over the last two years to develop affordable, timely, and effective training curriculum for aviation management and staff. Our challenge has been to identify strong topics that can appeal to airports of various sizes and others in the aviation industry. It's taken a little longer than originally expected to get the program off the ground, but several training programs have taken shape in recent months that look to be very promising. Watch your mail and email for more information in coming months.

And of course NYAMA is preparing for our annual conference and trade show. This year's conference will be held in Rochester at the Clarion Riverside Hotel, October 5-7. The program is taking shape and will address topics such as Part 139 recurrent training, new instrument approaches, GA security, State and Federal updates, and more. Registration materials will be mailed and available online mid-summer.

Have a wonderful summer, stay cool, and stay involved. We hope to see you at one of the training events later this year and at the fall conference!

Sincerely,

Rich Halik

Rich Halik
NYAMA President

Mark Your Calendar!

NYAMA 2005 Fall Conference & Expo

Fly New York!

October 5-7, 2005 | The Clarion Riverside Hotel | Rochester, NY

Hosted by: Greater Rochester International Airport

Registration materials will be distributed mid-summer. Visit www.nyama.com for program updates and conference details. Interested in sponsoring? Contact NYAMA today to request sponsorship information, or download information online at www.nyama.com.

Community Air Service Coalition (CASC)

The terrorist attacks of September 11, 2001, the ongoing effects of deregulation, and a very rocky airline industry over the past few years have conspired to create real hardship for many small communities. Over the past four or five years several airports have lost all air service and others have been reduced to reliance on a single carrier. With so many legacy airlines in financial trouble, a lot of single carrier airports may be a heartbeat away from becoming General Aviation facilities only.

As a result of these widespread concerns a group of individuals representing small airports and allied interests got together in the Washington offices of BACK Aviation Solutions to kick around ideas that might improve the situation for those most affected by the downturn in small community air service. These conversations lead to the formation of the Community Air Service Coalition (CASC), its incorporation in Delaware on January 5th 2005 and formal election of a board of directors on March 15th 2005.

The CASC Board of Directors consists of Bob Bryant, AAE (Salisbury-Ocean City Regional Airport - Chair), Bob Nicholas, AAE (Ithaca Regional Airport), Mark Courtney, AAE (Lynchburg Regional Airport), Marc Drolet (Pratt & Whitney, Canada) and David Rosenberg (Raytheon Airline Aviation Services). Tulinda Larsen of BACK Aviation Solutions is the President.

The purpose of CASC is to act as a focal point for small airports and associated interests in terms of air service issues - what is being done to keep air service and/or attract new air service, monitoring new regulations and proposed legislation that might affect small community air service, and to lobby for anything that may help in the cause of better air service for small communities.

At its first meeting on April 13th under the Chairmanship of Bob Bryant, the board tackled the issue of possible legacy carrier liquidations and how they might relate to slot issues and access to slot-restricted airports. 18 of 33 airports that rely solely on US Airways service participated in the meeting, resulting in tremendous synergy and real solutions to some pressing problems. Many of these ideas and suggestions were subsequently carried by CASC officials to a meeting with US Airways at the airline's nearby headquarters in Arlington.

CASC is a fledgling organization but it has already taken some positive first steps to deal with the negative impacts of eroding air service. As the membership grows and the weight of its members views are felt in Washington and elsewhere, CASC promises to be a real service to non-hub airports and the communities that are relying on continued and viable air service. For further information call Tulinda Larsen (202) 783-5052, Bob Bryant (410) 548-4827, Bob Nicholas (607) 257-0456 or check the CASC website at: www.smallairport.com. ■

GA Airports: Registration Deadline Nears

New York State's sweeping anti-terrorism laws of 2004 require general aviation airports in the state to register with the New York State Department of Transportation by July 22, 2005. Each registration must be accompanied by a security plan addressing the recommendations in the TSA's federally endorsed guidelines ("Security Guidelines for General Aviation Airports") published in May 2004.

GA airports are also required to submit their security plans to the local law enforcement agency of jurisdiction, the New York State Police and the New York State Office of Homeland Security.

Contact the NYSDOT Aviation Services Bureau for assistance at: (518) 457-8343. Information, forms, references and step-by-step registration instructions are available on NYSDOT's website at www.dot.state.ny.us/pubtrans/gasecurity.html. ■

FAA, continued from page 1
aviation growing," said FAA Administrator Marion C. Blakey. "We are redesigning airspace, deploying new software that will help increase capacity, and putting new procedures in place. These forecast trends will require that the FAA's resources be properly targeted during this period of change. We will be ready."

Despite economic difficulties facing many of the nation's large airlines, the strength of regional air carriers and international travel plays a large role in keeping demand for aviation services on a continued path for growth, according to the report.

The regional/commuter airlines are projected to experience the greatest increase in passenger volume among commercial air carriers, up 15.4 percent from last year. The FAA defines regionals/commuters as airlines that generally operate aircraft of 70 seats or less, with a main mission to link passengers to a larger affiliated, or code-shared, airline. The regional jet fleet is expected to undergo the largest increase, from 1,630 aircraft in 2004 to 2,960 by 2016.

Despite the increased price of fuel and a slower rate of growth than regional airlines, large domestic carriers also are forecast to see an increase in passengers from 502.2 million in 2004 to 700 million by 2016, equal to 2.8 percent each year.

Air travel to and from the United States is also on the rise. International passenger travel on large commercial and regional air carriers increased from 54.1 million in 2003 to 61.3 million in 2004, an increase of 13.4 percent. Over the 12-year forecast period, the largest increases in international travel are slated to occur on Latin American routes at a rate of 5.5 percent more passengers annually.

In 2004, total landings and

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Airport Security Coordinator Training Opportunity

Wilkes-Barre Scranton International Airport

Wilkes-Barre Scranton International Airport will host an Airport Security Coordinators class scheduled for August 11, 2005.

TSAR §1542.3(c) states: "...no airport operator may use, nor may it designate any person as, an ASC unless that individual has completed subject matter training, as specified in its security program, to prepare the individual to assume the duties of the position."

The airport invites attendees to register by Aug 1st. to confirm a spot in the course to be held at the Wilkes Barre Scranton International Airport (AVP) 100 Terminal Road, Avoca PA. The class will start at 0800 and concludes around 1630. The daylong course follows the curriculum guidelines of the TSA. It includes current information on the role of DHS, threat information discussion and the ASC responsibilities, as well as writing and maintaining a current airport security program. Participants will share their experiences and benchmark case studies to make this a rewarding experience.

General registration for the training courses is \$295.00. Certificates will be issued to each attendee at the completion of the program to document their training. For registration, information and additional dates as they are available, visit www.AviaEd.net and click the Upcoming Courses link or email Info@AviaEd.net. ■

Cover story, continued from page 1

legislators in spite of the snowy conditions. Overall, NYAMA members left feeling encouraged the concerns of aviation were adequately communicated and well-received.

On-Time Budget

As you know, New York State passed the first on-time budget in twenty years. The budget included several aviation related elements.

- The budget and 5-year transportation capital plan continued the \$8 million allocation for state share of federal AIP grants. Though encouraged this funding was not in jeopardy, NYAMA was disappointed the 5-year plan did not account for any gradual increase in funding. On a related note, NYAMA is currently working to author legislation that will free unused matching share funds for use in the Airport Improvement and Revitalization fund (once known as AIR 99).
- In the flurry of activity preceding the April 1 deadline, the legislature agreed to a 5-year, \$2.9 billion transportation bond to be put before voters at the November election. The bond act includes \$76 million allocated for aviation projects.
- Unfortunately, the sales tax relief legislation for aircraft purchase was not included in the budget as NYAMA had hoped. Because the legislation affects state revenues, successful passage must generally be tied to the budget process. NYAMA will continue to advocate for this legislation and seek to build support in preparation for next year's budget process.

Bond Act

As noted above, included in the budget was a proposed transportation bond act which includes \$76 million for aviation projects. NYAMA's primary concern with regard to the bond act is with regard to how that money is allocated for aviation projects.

In early May, NYAMA representatives met with Tom Madison, Deputy Secretary to the Governor for Transportation, to discuss this and other matters. During the meeting, NYAMA suggested following a pattern similar to that developed for the unsuccessful 2000 transportation bond act. The funding breakdown would include line item amounts allocated to commercial service airports and some general aviation airports for business development and capital projects, and would place the remaining funds into the Airport Improvement and Revitalization fund (AIR) to be allocated through the existing application process.

NYAMA followed up that meeting with a letter to the Governor, outlining in detail the Association's proposed funding breakdown. The proposal also includes a general aviation security fund specifically allocating monies for security improvements.

We have continued dialog with the state Department of Transportation on this matter, and expect the Governor and Legislature to sign a memorandum of understanding in the near future, outlining the agreed upon fund allocations. NYAMA's degree of support for the bond act will rest in part on how the proposed monies are allocated. We will keep you informed as more information becomes available.

DOT Transformation

Another significant concern facing aviation in New York State is with regard to the state Department of Transportation (NYSDOT) transformation process.

As you know, NYSDOT has been in the process of "transforming" for several years now. The goal of the process was to improve internal operational efficiencies and effectiveness through a function-based reorganization. Up until recently, NYAMA has received little information regarding the specific outcomes of this process.

In the last few months, NYAMA has learned in greater detail what this reorganization will effectively mean for the aviation community.

Among other things, the transformation process will completely dissolve the NYSDOT Aviation Service Bureau as it is currently known. The airport grant process is expected to move to a new accounting function office, and the policy-related role will transfer to a new policy and strategy division. The remaining aviation functions are expected to be managed through the Operating Division, Office of Program Development and Management, under the oversight of Steve Lewis.

NYAMA has expressed great concern over the decentralization of aviation issues and the general direction taken with regard to the transformation process. NYAMA's meeting with Tom Madison,

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NYAMA 2005 Advocacy Day

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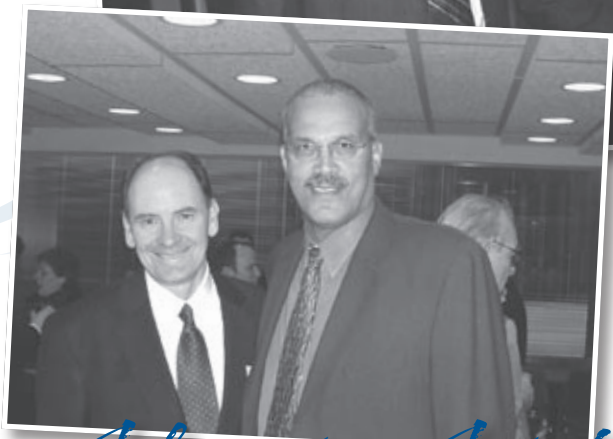
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Advancing Aviation – Advancing New York!

Cover story, continued from page 4 noted earlier, was initially set up for the express purpose of sharing these concerns with the Governor's office. Following the meeting, NYAMA sent a letter to Mr. Madison outlining in greater detail the issues in question.

Sales Tax Relief

As NYAMA continues to advocate for extension of the sales tax relief legislation to include the purchase of general aviation aircraft, we ask members to do the following:

- Keep NYAMA informed of what impact you have noticed since the legislation passed last year providing sales tax relief for the repair and maintenance of general aviation aircraft. It is important we document specific ways in which this has impacted the industry.
- Please send letters thanking your legislators for supporting this legislation. This was a significant victory for the industry last year — It is important we thank legislators for their help in passing the bill.
- Encourage support for the new legislation, exempting aircraft purchases from sales tax. NYAMA has drafted a template letter to be used for this purpose. Please contact Association headquarters to request a copy emailed to you for your use.

Moving Forward

The Association will continue to monitor these concerns and keep members informed of any new developments. ■

Arlene Feldman to Retire after 21 years

Arlene Feldman, who started her career as a government aviation executive with an appointment as director of the New Jersey Division of Aeronautics in 1982, will end a 21-year career as an FAA executive on August 31. She joined the FAA in 1984, and has served as director of the FAA Eastern Region since 1994.

Feldman has served in a variety of executive positions since joining the FAA. She first served as deputy director and later acting director of the agency's Technical Center in Atlantic City. The center is the nation's leading aviation research and development facility, and has played a prominent role as a testing and evaluation facility. The center was a leader in testing fireproof materials for use in aircraft. During her tenure there, Feldman established a reputation as a pioneer in the advancement of rotorcraft technology.

After two years, she was appointed deputy director of the FAA's Western Pacific Region. Among her accomplishments in that position was the successful closure and reopening of the major runway at Los Angeles International Airport in a manner that minimized delays and revenue losses to the airlines and the general aviation community.

In 1988, she was appointed regional administrator of the FAA's New England Region where she initiated a program for recruiting women and minorities. She established a region-wide mentoring program that became a model for others.

As director of the Eastern Region, the nation's busiest, she won acclaim for her community outreach program designed to initiate efforts to mitigate aircraft noise concerns in the northeast.

Feldman was the first female to serve as deputy director of the FAA Technical Center, and the first to become director of an FAA region when she was appointed to that post in the Pacific Western Region. Feldman is an attorney and a pilot.

She has served as regional vice president of the National Association of State Aviation Officials and chairperson of the Regional Airport System Planning Advisory Committee of the Delaware Valley Regional Planning Commission. She's a member of the American Association of Airport Executives and the Standing Committee on Aviation of the American Association of State Highway and Transportation Officials.

Feldman plans to pursue other aviation interests following her retirement. ■

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Job Opportunities

ASSISTANT AIR TERMINAL SUPERVISOR - The Niagara Frontier Transportation Authority is recruiting for the position of Assistant Air Terminal Supervisor. Under the supervision of the Air Terminal Superintendent, supervises and performs work concerned with maintaining appearance and condition of the Buffalo Niagara International Airport terminal. Assign daily tasks and checks completed work of custodial staff. Directs the custodial staff in their performance. Ability to work any shift on any day including weekends and holidays; demonstrated ability to work with a minimum of supervision; ability to understand and follow oral and written directions; ability to read and understand standard operating procedures and Management directives. High school graduate, some secondary education in building operation or customer service areas desirable; minor mechanical and electrical troubleshooting of custodial equipment; must have a minimum of five (5) years experience in building maintenance and operations and a minimum of three (3) years license experience in direct supervision of others; must possess a valid New York State driver's license; computer operations experience. Qualified applicants should send a resume to: Manager, Human Resources, Niagara Frontier Transportation Authority, 181 Ellicott Street, Buffalo, NY 14203 an AA/EEO Employer.

ASSISTANT DIRECTOR OF AVIATION - The Niagara Frontier Transportation Authority is recruiting for the position of Assistant Director of Aviation. The Assistant Director of Aviation is responsible for planning, organizing and directing the overall airside and landside maintenance and operations of the Buffalo Niagara International Airport on a day-to-day and long-range basis. This person will direct airport activities/functions/operations by planning, assigning and supervising the work of the airport department superintendents to ensure a smoothly run and efficiently controlled transportation facility. Assist in preparing the operating and capital budget. Maintain liaison with Federal Aviation Administration (FAA), and Transportation Security Administration, (TSA). Maintain current Certification and Safety manual, Emergency Management Plan, and ensure compliance with airport certification requirements under FAA Regulation Part 139 and TSA Regulations 1540-1542. Maintain Minimum Standards Policy and Ground Transportation Policy. Maintain liaison with all airport tenants and ensure adherence to NFTA contractual agreements. Minimum of a Bachelor's Degree in Business Administration or Aviation-related field and a minimum of seven years experience of demonstrated and progressively more responsible administrative experience in the management and leadership in a comprehensive operations or facilities environment. Airport operations experience preferred.

Qualified applicants should send a resume to: Director, Human Resources Niagara Frontier Transportation Authority 181 Ellicott Street Buffalo, NY, 14203 An AA/EEO Employer.

News from the Federal Front

Material reprinted with permission from AAAE Airport Report, June 1, 2005

House Panel Considers FAA Funding

The House transportation appropriations subcommittee held a hearing May 10 on fiscal year 2006 funding for FAA. With reduced revenues flowing into the aviation trust fund and FAA budget needs on the rise, subcommittee members questioned FAA Administrator Marion Blakey on the wisdom of the president's plan to cut the Airport Improvement Program (AIP) by \$600 million from the 2006 authorized level. Other topics discussed included air traffic controller staffing levels and the proposed nighttime closure of air traffic control towers.

During the hearing, committee Chairman Joe Knollenberg (R-Mich.) focused on the proposed cuts in AIP from nearly \$3.5 billion in 2005 to \$3 billion in 2006. He stated that while cost saving opportunities exist for FAA, the agency should not achieve them through cutting capital costs. Ranking Member John Olver (D-Mass.) remarked that the proposed 15 percent cut in AIP funding represented "another example of erosion of our infrastructure" and would "put our communities in a bind."

Blakey acknowledged the "growing gap between our costs of operating the system and the revenue that is coming into the aviation trust fund," but said she believes that the proposed AIP cut reflects the latest trends in airport capital development needs.

Hal Rogers (R-Ky.) and Todd Tiahrt (R-Kan.) said that funding AIP below \$3.2 billion would affect the formula distribution of funds. Blakey responded that airports could address the budget shortfall by taking advantage of their authority to impose PFCs. She noted that if airports raised passenger facility charges from \$3 to \$4.50, they could raise an additional \$350 million annually for airport development needs.

Congressional opposition remains to FAA's proposal to close up to 42 towers between the hours of midnight and 5 a.m. due to low levels of activity. John Sweeney (R-N.Y.) asked whether FAA had done a cost/benefit analysis on the proposal and whether the projected \$6 million per year savings was worth the cost. While Blakey answered that FAA had conducted a cost/benefit analysis, she said that the agency could not afford to ignore seven figure cost savings in the current budget environment. However, Blakey said that that this is just one of many cost cutting initiatives under consideration and a final decision has not yet been made.

Mineta Urges Trust Fund Reform

The U.S. needs to "start thinking" about a better way to fund new airport runways, towers and safety equipment, Transportation Secretary Norman Mineta said during the May 16 kick-off of National Transportation Week.

Mineta called for reform of the aviation trust fund, saying the time has come to trade in the "1970s model" financing plan for one that can "keep pace with the growing numbers of passengers that our airports and airlines are seeing every day."

Mineta said the aviation trust fund doesn't raise enough money to pay for needed system improvements because revenues are based on a percentage of the fare each traveler pays for a plane ticket. "These lower fares are great news for travelers, but they have unfortunate implications for aviation infrastructure," he said.

Noting that ticket prices at the end of 2004 were down 9 percent from their peak in 2000, Mineta said the trust fund raised just over \$9 billion last year, \$4 billion short of the \$13 billion need to make necessary improvements to the system.

Hawley Named To Head TSA

President Bush's announcement that he will nominate Edmund "Kip" Hawley as assistant secretary of homeland security for TSA will return Hawley to the agency that he helped to create.

Currently a supply chain technology consultant, Hawley was one of the industry officials who helped DOT set up TSA after the Sept. 11, 2001, terrorist attacks. Hawley also is a member of FAA's Air Traffic Services Committee. An attorney, Hawley previously served as vice president of transportation services for Union Pacific Railroad in Omaha. Earlier, he was deputy assistant secretary and executive director of governmental affairs for DOT.

Current TSA chief David Stone has announced plans to leave the agency in June. ■

FAA, continued from page 3
takeoffs at combined FAA and contract towers rose 0.5 percent, the first increase in activity since 2000. Of the users in the aviation community, commuters/air taxis increased their operations by 7 percent and 0.8 percent respectively. General aviation, or private flying, and military flights both declined in activity. Commercial aircraft operations are now at 1999 levels, while non-commercial operations are at 1996 levels.

The FAA bases its forecast of sustained aviation growth on economic projections from the Office of Management and Budget (OMB). According to OMB, the nation's Gross Domestic Product is projected to increase from \$10.7 billion in 2004 to \$15.6 billion in 2016, with a moderate inflation rate of 1.5 percent annually during that period.

A copy of FAA's Aerospace Forecasts Fiscal Years 2005-2016 can be found on the web at www.faa.gov. ■

GA Aircraft Shipments, Billings Increase

The General Aviation Manufacturers Association reported that first-quarter numbers for general aviation shipments were up 15.7 percent to 627 units while industry billings for new airplanes rose to \$2.7 billion.

First quarter shipments of pistonpowered airplanes manufactured worldwide increased to 432 units in first quarter 2005, up from last year's 394. Turbo-prop shipments increased from 34 airplanes in the first quarter of 2004 to 57 this year. Business jets were also up with first quarter shipments increasing 21.1 percent, from 114 units last year to 138 units this year. ■

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AirCurrents reserves the right to edit all submitted articles for content and format. Please address any comments or questions in care of the Editor to: *AirCurrents*, 119 Washington Avenue, Suite 100, Albany, NY 12210, (518) 432-9973, email: info@nyama.com.



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American General Aviation Association Takes Off

American General Aviation Association (AGAA) is a new organization committed to serving the GA community across the country. Its descriptive slogan is "the voice for a higher form of personal transportation."

Using sponsorship and strategic alliances, the Association will seek to enroll whole categories of general aviation, building membership quickly. Entire airport communities, from Boeing Field to Teterboro, from Van Nuys to Orlando will be encouraged to join. J-3 to BBJ owners, student pilots to flight department directors; every individual directly or indirectly involved with general aviation will be invited to be a part of building the most comprehensive umbrella organization of general aviation.

More information will be available at: www.agaa.org. ■

AAAE Introduces GA Airports Economic Impact Statement Tool

AAAE is introducing the "General Aviation Airports Economic Impact Statement," a new Internet-based product to assist GA airports in accurately determining the financial benefits they bring to their communities.

Produced in partnership with Elite Services Group, LLC (ESG), this valuable and inexpensive tool is quick, reliable and easy to use. Participating airports simply provide information on their operations through a brief Internet-based survey. In about 30 days, AAAE will produce a customized report detailing the Direct, Indirect, and Induced economic impact. The report is based on a model derived from information from more than 300 airports, including flight operations, operating budget, number of aircraft and local per capita income.

The cost of a report customized for your airport is \$650. To participate, go to www.aaae.org/products and click on "Interactive Reports." For more information, contact Adam Mayberry at (703) 824-0500, Ext. 182, or e-mail adam.mayberry@aaae.org. ■

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