



U.S. Department
of Transportation
**Federal Aviation
Administration**

Office of the Chief Counsel

800 Independence Ave. SW
Washington, DC 20591

September 26, 2016

**BY FEDERAL EXPRESS and CERTIFIED MAIL, RETURN-RECEIPT
REQUESTED**

Mr. Rick Cole
City Manager
City of Santa Monica
1685 Main Street, Room 209
Santa Monica, CA 90401

Re: *In the Matter of Compliance With Federal Obligations By the City of Santa
Monica, California*

Enclosed are two subpoenas regarding the above-referenced matter.

If you have any questions concerning the enclosed subpoena, please contact
Scott Mitchell, Senior Attorney, Airport Law Branch at (202) 267-9676 or at Scott.E.
Mitchell@faa.gov.

Thank you for your cooperation.

Sincerely,



Mark W. Bury
Deputy Chief Counsel

Enclosures

UNITED STATES OF AMERICA
DEPARTMENT OF TRANSPORTATION
FEDERAL AVIATION ADMINISTRATION

SUBPOENA TO TESTIFY

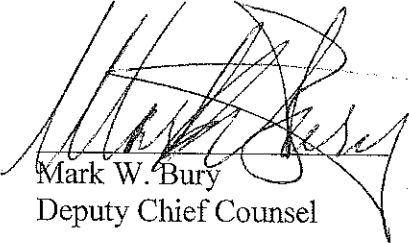
TO: Mr. Rick Cole
City Manager
City of Santa Monica
1685 Main Street, Room 209
Santa Monica, CA 90401

At the instance of the Federal Aviation Administration and pursuant to 14 C.F.R. § 16.29, you and/or persons designated by the City of Santa Monica who consent to testify on its behalf are hereby required to appear before Mark W. Bury, Deputy Chief Counsel or his designee, of the Federal Aviation Administration at the

Federal Aviation Administration
Western Pacific Regional Office
15000 Aviation Boulevard
Hawthorne, CA 90250

on the 12th day of October, 2016 at 11:00 o'clock A.M. of that day, to testify *In the Matter of Compliance With Federal Obligations By the City of Santa Monica, California* on matters related to Attachment 1 to the subpoena duces tecum and documents produced pursuant thereto. The City has a duty to designate those who will testify. The person designated must testify about information known or reasonably available to the organization.

In TESTIMONY WHEREOF, the undersigned, an officer designated by the Administrator of the Federal Aviation Administration, has hereunto set his hand at Washington, D.C. this 26th day of September, 2016.


Mark W. Bury
Deputy Chief Counsel

UNITED STATES OF AMERICA
DEPARTMENT OF TRANSPORTATION
FEDERAL AVIATION ADMINISTRATION

**SUBPOENA TO PRODUCE DOCUMENTS
OR INFORMATION**

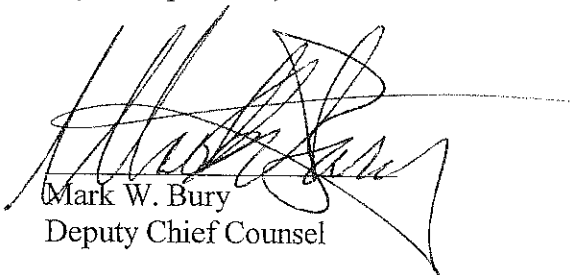
TO: Mr. Rick Cole
City Manager
City of Santa Monica
1685 Main Street, Room 209
Santa Monica, CA 90401

At the instance of the Federal Aviation Administration and pursuant to 14 C.F.R. § 16.29, you are hereby required to produce at the Office of Airports, 800 Independence Ave., SW, Room 600, Washington, DC 20591 on the 3rd day of October, 2016 at 9:00 a.m. the documents or electronically stored information, and to permit inspection and copying of the documents or electronically stored information, identified in ATTACHMENT 1.

No personal appearance is necessary if the requested information is provided before the return date of this subpoena, in which case, the requested information must be sent by expedited delivery to the attention of:

Kevin Willis
Director, Airport Compliance and Management Analysis
Federal Aviation Administration
800 Independence Ave., SW, Room 600
Washington, DC 20591

In TESTIMONY WHEREOF, the undersigned, an officer designated by the Administrator of the Federal Aviation Administration, has hereunto set his hand at Washington, D.C. this 26th day of September, 2016.



Mark W. Bury
Deputy Chief Counsel

ATTACHMENT 1

Any and all records or reports in your custody and control, including but not limited to, emails, correspondence, notes, documents, spreadsheets, photographs, videos, statements, payroll records, and/or schedules, related in any manner to:

1. Any and all plans the City has created for providing Fixed Base Operator (FBO) functions it is taking over from American Flyers Flight School (American Flyers) and Atlantic Aviation of Santa Monica, LP (Atlantic).
2. The names of each and every City employee who is or will be providing flight instruction services on and after October 15, 2016.
3. The airman certification status of each and every City employee who is or will be providing flight instruction services on and after October 15, 2016.
4. Any limitations or restrictions with respect to the time of day the City is or will be providing flight instruction on and after October 15, 2016.
5. The location on the airport where the City is or will be providing flight instruction, including but not limited to areas where pre-flight training, and post-flight instruction is or will be provided, on and after October 15, 2016.
6. The City's arrangements for maintaining flight training records and files for flight training the City conducts or will be conducting on and after October 15, 2016.
7. The equipment the City is or will be using to provide flight instruction on and after October 15, 2016.
8. The Airworthiness certificate and registration for each aircraft the City is or will be using for flight instruction on and after October 16, 2016.
9. Written materials, including but not limited to manuals, aeronautical charts, syllabi and training aids, that the City is or will be using to provide flight instruction on and after October 15, 2016.
10. The arrangements the City has made with respect to the maintenance of the equipment it is or will be using for flight instruction.
11. The types of aviation-related maintenance the City is or will be performing on and after October 15, 2016.
12. The names of each and every City employee who is or will be providing aviation-related maintenance services on and after October 15, 2016.
13. The airman certification status of each and every City employee who is or will be providing aviation-related maintenance services on and after October 15, 2016.
14. The location and types of facilities on the airport where the City is or will be providing aviation-related maintenance services on and after October 15, 2016.
15. Any limitations or restrictions with respect to the time of day that the City is or will be providing aviation-related maintenance services on and after October 15, 2016.
16. Arrangements the City has made or will make to ensure access to documents and data required for the performance of aviation-related maintenance, including but not limited to Manufacturer's Maintenance Manuals, Instructions for Continued Airworthiness, and Airworthiness Directives, for each and every aviation-related maintenance service that it is or will be performing on and after October 15, 2016.

17. Arrangements the City has made or will make to ensure employees performing aviation-related maintenance will have access to the appropriate tools required to perform aviation-related maintenance on and after October 15, 2016.
18. A description of the types of fueling services the City is or will be performing on and after October 15, 2016.
19. Details, plans, records, or similar documentation demonstrating how the City is or will be providing fuel services in compliance with FAA regulations and the applicable standard of care on and after October 15, 2016.
20. Arrangements the City has made with fuel suppliers to procure fuel to provide fueling services on and after October 15, 2016.
21. The names and the number of City employees who are or will be providing fueling services on and after October 15, 2016.
22. Any training City employees providing fueling services on and after October 15, 2016 have received or are receiving to provide such fueling services.
23. The equipment, such as trucks, pumps, tanks, and hoses, the City is or will be using to provide fueling services on and after October 16, 2016.
24. The City plans and procedures for providing fueling services on and after October 15, 2016, including but not limited to how fuel is transported, stored, and delivered to aeronautical customers.
25. The City's plans and procedures the City's plans and procedures for complying with all applicable local, state, and Federal regulations and the applicable standards of care related to the storage, transportation, and delivery of fuel when providing fueling services.
26. Records of airport vehicle operator training provided to or that will be provided to City employees who provide services at the airport on or after October 15, 2016.

CERTIFICATE OF SERVICE

I certify that the foregoing **SUBPOENA TO PRODUCE DOCUMENTS OR INFORMATION** and **SUBPOENA TO TESTIFY** has been served on the City of Santa Monica via Federal Express, sent on this date to:

Mr. Rick Cole
City Manager
City of Santa Monica
1685 Main Street, Room 209
Santa Monica, CA 90401

and

Marsha Moutrie
City Attorney
1685 Main Street, Room 209
Santa Monica, CA 90401

Dated this 26th day of September, 2016.


Federal Aviation Administration