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April 30, 2012

Mr. Jeff Hamiel  
Executive Director  
Metropolitan Airport Commission  
6040 28th Avenue South  
Minneapolis, MN 55450

Dear Mr. Hamiel:

The Aircraft Owners and Pilots Association (AOPA) represents the interests of 400,000 members nationwide with over 7,500 residing in the State of Minnesota. The Association is committed to ensuring the future viability and economic development of general aviation airports and facilities without unjust economic hardships.

We are writing to express our concern regarding the ongoing proposals to modify the fee structure at the general aviation airports operated by the Metropolitan Airport Commission (MAC). These general aviation airports are an integral part of an overall aviation system which includes the Minneapolis-St Paul International Airport (MSP). As such, these GA airports provide important operational relief to MSP, which is a direct benefit to the airlines operating at MSP.

In speaking with members of the Association, we have learned that MAC is considering the implementation of landing fees for turbine aircraft operating at Flying Cloud Airport (FCM) and Anoka County Airport (ANE). We are aware that these fees have been collected for some time at St. Paul Downtown Airport (STP). The landing fee structure planned seems to indicate the fee would be charged to both transient and based aircraft at these three airports.

It is our experience that when landing fees are implemented at airports served by general aviation aircraft, these fees are levied against aircraft that on commercial, revenue producing flights and that weigh in excess of 12,500 pounds.

We also understand that a second element of the new fee structure will be a modification and increase in the fuel flowage fee on turbine Jet-A fuel.

At the same time, in reviewing available documentation from MAC, it appears that the above modifications will also result in changes to Ordinance 96 and 107 including provisions relating to mandatory escalation fees to current land lease holders which would potentially remove rate and charge increases to these tenants.

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As AOPA has long articulated to MAC and other government sponsors of multi-airport systems, it is important to view the airport system in the Twin-Cities as a “system” rather than each airport as an individual airport with its own set of balance sheets. Each airport serves a role within a system much like other multi-chain store operations albeit a grocery or drug store chain. Each has a role and serves a purpose in a symbiotic relationship.

Unfortunately, it does not appear that some of the airlines operating at MSP understand that these airports help them avoid delays at MSP. That fact becomes obvious in the lease one airline has with MAC that limits the amount of revenue MAC can put into the reliever airport system to \$300,000 per year. I can assure you that airlines would suffer much more in financial costs if even a small portion of operations from the reliever airports came to MSP – which they can do if they so choose. Nor do we believe it’s appropriate for an airline to dictate to MAC how it funds the total airport system including MSP and the relievers.

We can certainly understand MAC’s desire to remove financial uncertainty from operation and development of the GA reliever airport system. However, AOPA requests that MAC ensure that any and all steps that could reduce expenses be explored prior to consideration of increases in fees for the operators of turbine aircraft.

We will be advising our members in the Twin-Cities of the May 7<sup>th</sup> public hearing and encourage them to attend and provide MAC with their respective perspectives on the proposed changes.

We appreciate your consideration of our concerns.

Sincerely,

A handwritten signature in black ink, appearing to read "Bill Dunn", with a long horizontal line extending to the right.

Bill Dunn  
Vice President  
Airport Advocacy