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July 29, 2024

Mr. James M. Holland, Chair  
Capital Region Airport Commission  
1 Richard E Byrd Terminal Drive  
Richmond, VA 23250

**TRANSMITTED BY ELECTRONIC SUBMISSION**

**Email:** [hollandj@chesterfield.gov](mailto:hollandj@chesterfield.gov); [slinn@flyrichmond.com](mailto:slinn@flyrichmond.com)

**Re: Resolution to exercise Proprietary Exclusive Right to provide aeronautical activities.**

Chairman Holland and members of the Capital Region Airport Commission (CRAC),

The Aircraft Owners & Pilots Association (AOPA) is the world's largest aviation membership organization representing the general aviation interests of 300,000 aircraft owners and pilots nationwide, including 8,000 from the Commonwealth of Virginia. **On behalf of these members, I write this letter to express our concerns with Richmond International Airport's (RIC) proposal to exercise its proprietary exclusive right, eliminating two established Fixed Base Operators (FBO) and the market competition that benefits all consumers.**

The Richmond International Airport (RIC) is an important economic asset and a vital transportation link for central Virginia. The airport attracts business to the area, creates jobs, generates local revenue, and has benefited from the investments of two FBOs. RIC is home to approximately 50 aircraft. More than 113, 000 operations (takeoffs and landings) are conducted annually with approximately one-half of these operations attributed to based or transient general aviation aircraft.

AOPA has undertaken a national effort to ensure fair and reasonable access for aeronautical users, including commercial tenants like FBOs. The acceptance of federal airport improvement program (AIP) grants comes with an obligation to operate as an accessible public-use airport including having reasonable prices and fees, among other key obligations. We believe competition is good for ensuring quality of service and reasonable pricing and therefore in the public's best interest. We are concerned that the passage of the resolution to exercise RIC's proprietary exclusive right to serve as the sole FBO would, in effect, remove built-in consumer protection and healthy competition for aircraft services including fueling and storage.

For an airport sponsor to take action to utilize their proprietary exclusive rights to serve as the FBO, the sponsor is obligated to meet its own established minimum standards, the same as a private FBO. This likely means significant investment in human capital and capital investments to serve in that capacity as the employees must be direct employees of RIC. AOPA believes a well-run airport leads to better pricing for all and we hope that the requirements for RIC to run

its own FBO have been fully vetted to avoid unforeseen and unnecessary expenditures that will drive your cost per passenger up as well as cost for services to general aviation customers.

We appreciate the complex and challenging decisions that must be made by the CRAC to ensure the economic vitality of RIC and the long-term benefit of users. In the same way, AOPA is committed to ensuring the safety, future viability, and development of general aviation as an integral part of a national transportation system. We have long stressed the value and necessity of airports for promoting aviation and air travel and bringing affordable access and economic benefits to communities like Richmond. In addition to ensuring compliance with grant assurances, it is in the public's interest for the Commission to continue to permit healthy competition.

Thank you for your consideration of this important issue. If you have questions or require additional information, please contact me directly by calling 301-695-2090 or emailing [sean.collins@aopa.org](mailto:sean.collins@aopa.org).

Sincerely,



Sean M. Collins, AOPA  
Eastern Regional Manager

Cc.

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