



Holly Weiss &lt;hweiss@ucmo.edu&gt;

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**RE: RCM Skyhaven Part 13 Complaint**

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**Jones, Michael G.** <mgjones@martinpringle.com>

Mon, Dec 23, 2024 at 9:14 AM

To: "Muder, Angela (FAA)" &lt;Angela.Muder@faa.gov&gt;

Cc: "Walter, Amy (FAA)" &lt;Amy.Walter@faa.gov&gt;, "Joel, Rodney (FAA)" &lt;rodney.joel@faa.gov&gt;, [REDACTED]

Ms. Muder,

See our response on UCM's behalf attached.

Have a good holiday break.

Mike

**Michael G. Jones**

*Attorney*

**MARTIN PRINGLE ATTORNEYS AT LAW**

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**Letter to Ms Muder.pdf**

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## RE: RCM Skyhaven Part 13 Complaint

Muder, Angela (FAA) <Angela.Muder@faa.gov>

Mon, Dec 23, 2024 at 2:33 PM

To: "Jones, Michael G." <mgjones@martinpringle.com>

Cc: "Walter, Amy (FAA)" <Amy.Walter@faa.gov>, "Joel, Rodney (FAA)" <rodney.joel@faa.gov>, [REDACTED]

Mr. Jones,

In response to your letter dated December 20, 2024, the FAA acknowledges the process for the informal Part 13 complaint and would like to address our request for additional information related to RCM's requirements for businesses and commercial aeronautical activities operating on the airport. **The licensees' complaint regarding "storage hangar licenses" is the reason for our request for additional information.**

Your November 12, 2024 response to the Part 13 complaint stated "UCM has rules and regulations in place for the safety and efficiency of the public and its licensees, including but not limited to the Complainants. These rules exist to protect members of the public that use the airport and to prevent flight delays. (Skyhaven Rules and Regulations, Exhibit A)."

We understand the purpose and use of the "general hangar license agreement" and concur with the use of such a document. However, the "general hangar license agreement" in use at RCM references the "UNIVERSITY Rules and Minimum Standards". Since the "general hangar license agreement" provides that hangars are to be "used solely for aircraft storage", we must refer to the "UNIVERSITY Rules and Minimum Standards" document for guidance addressing commercial activity on the airport. Our December 11, 2024 request was for clarification to the statement "UCM has rules and regulations in place" and to address the following deficiencies in the "UNIVERSITY Rules and Minimum Standards":

1. Definitions of independent and temporary independent contractors with no guidance beyond the definition of both terms – **what rules, standards, regulations apply to commercial aeronautical businesses? Please provide the documents to answer these questions.**
2. Section 6 of the "Rules & Regulations" also references "Business or Commercial Activity..." however, this section states: "Requirements are addressed in the Minimum Standard Requirements for Airport Aeronautical Services and individual licensee and operator agreements." – While we understand RCM may be in the process of developing, refining, updating, and combining documents, **where does one find this information now?** Hence our December 11, 2024 request.

It is our understanding that Mr. [REDACTED] before 2024, had two identically executed license agreements covering hangars E-3 and C-21. It is our understanding the "legacy" Airport Building License Agreements contained the same or similar language regarding commercial activity in the licensed premises. When the "new" Airport Building License Agreements were issued in 2024, **was Mr. [REDACTED] provided an agreement to conduct commercial activity on the airport? Was the airport not aware Mr. [REDACTED] was conducting a commercial business in building E-3 under the prior License Agreement?** Your November 12, 2024 response also states "UCM asks the individual to sign a separate agreement that reflects the actual market rate for a commercial hangar and accommodates additional risks brought about by those activities." Our December 11, 2024 request included this separate agreement. I have read the emails between the airport management and Mr. [REDACTED] I do not see a license agreement provided to Mr. [REDACTED] for negotiation or discussion.

**To facilitate our review, please respond with the documents (license agreement, additional agreement, rules and regulations, minimum standards, etc.) a commercial entity can expect to receive and follow as a licensee of the airport. Please provide the documents to answer the questions above.**

Additionally, we look forward to working with RCM to improve its practices and documentation in accordance with their grant assurances.

Please respond to our request by COB Monday, December 30, 2024. Please let me know if you have any questions or need additional information.

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