



REDEFINING WHAT'S POSSIBLE

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December 23, 2025

Rodney Joel, Director [Rodney.joel@faa.gov](mailto:Rodney.joel@faa.gov)  
Angela Muder, Compliance Specialist [Angela.Muder@faa.gov](mailto:Angela.Muder@faa.gov)

Federal Aviation Administration.  
Office of Airports  
901 Locust, Room 364  
Kansas City, MO 64106

Re: Corrective Action Plan for Informal Complaint Received October 14, 2024

Dear Mr. Joel and Ms. Muder,

I am writing to document UCM's ongoing progress regarding the Corrective Action Plan in accordance with the FAA's instructions, which requires a bi-weekly report on progress.

UCM is in receipt of your December 08, 2025, correspondence. Per your recommendation, we are in the process of separating our combined Rules and Regulations/Minimum Standards into two separate documents. Additionally, we are reviewing the guidance materials provided by you in your letter of December 8, 2025, including:

- 49 U.S.C. § 47107(a),
- Grant Assurance 22 (Economic Nondiscrimination)
- Grant Assurance 23 (Exclusive Rights)
- FAA Order 5190.6B, Airport Compliance Manual
- Advisory Circular (AC) 150/5190-8, Minimum Standards for Commercial Aeronautical Activities.

UCM acknowledges that the FAA is recommending Minimum Standards that categorize commercial aeronautical activities and define requirements based on the specific categories of commercial aeronautical activities. UCM is exploring this recommendation and has begun the revision process of its Minimum Standards to speak to types of activity but has several questions regarding implementation, definitions, and requirements in an effort to understand the FAA's expectations regarding Item 1 and Item 2, particularly its assessment that increased requirements may not be placed on vendors due to their exclusive use of airport space, which is a common practice at other airports---something you encouraged us to consider in the past. The "incidental"

analysis was previously eliminated based on your directive. UCM is requesting a meeting with both of you to discuss these questions. Per AC 150/5190-8, the FAA may advise the airport's sponsors on the appropriateness of proposed standards to ensure the standards do not place the airport in a position inconsistent with its federal obligations. Without the opportunity to have a conversation about our questions and the FAA's interpretations, UCM is concerned that the resolution of this matter will continue to be delayed.

Regarding Item 3, UCM also has several questions. We'd like to address this matter during the meeting as well. UCM can provide a list of those questions on January 20<sup>th</sup>. UCM is further requesting the meeting to take place the following week, which should allow the FAA time to review UCM's revisions to its Minimum Standards as requested and submitted questions from UCM.

UCM is dedicated to ensuring compliance with Grant Assurances and resolving the remaining issues identified by the FAA. We look forward to finalizing the Corrective Action Plan and refocusing our attention on providing optimum facilities for our based customers and the flying public, including access to previously awarded grants that benefit the flying public.

Please provide me with your availability for a meeting with UCM the week of January 26<sup>th</sup> through January 30<sup>th</sup>. RCM's counsel will attend, and we'd of course welcome FAA counsel to attend as well. With numerous projects in the works and the FAA communicating to MoDOT that the FAA will not process payment requests for UCM airport projects, UCM will be forced to explore its due process and administrative procedure rights should this Part 13 investigation process continue to expand indefinitely in both time and scope since its filing more than 14 months ago.

Respectfully,

*Robert W. Little*

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