

August 19, 2025

Rodney Joel, Director
Angela Muder, Compliance Specialist
Federal Aviation Administration
Office of Airports
901 Locust, Room 364
Kansas City, MO 64106

Rodney.Joel@faa.gov
Angela.Muder@faa.gov

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.

Banner Activity Code Update One element of our submitted Corrective Action Plan (CAP) is a set of steps that will be taken to ensure non-discriminatory treatment between UCM and other commercial operations at the airport (Item #2). This included the creation of financial activity codes in our Enterprise Resource Planning (ERP) software (Ellucian) that will allow us to track expenditures related to airport operations, flight operations, and aviation maintenance more efficiently. Originally scheduled to be completed by September 24, 2025, we have created an initial set of codes and are now implementing them for the relevant financial transactions. We will continue to work with Accounting Services to ensure that the codes and this process function as intended.

Though tangential to the Part 13 complaint, you had asked for updates regarding Mr. Ralston's interest in conducting a commercial aviation mechanic operation out of his currently licensed storage hangar. I noted in my update to you on August 5, 2025, that Mr. Ralston had agreed to the terms outlined in the proposed contract and indicated his readiness to finalize the agreement. That contract was prepared in accordance with UCM procedures and shared with Mr. Ralston via email for electronic signature. However, he has not signed the contract. I emailed him on August 14th to inquire about this matter, asking if he had any concerns or questions. As of this date, Mr. Ralston has not responded to me. We are ready to finalize this agreement should Mr. Ralston still wish to do so.

Beyond these matters, I wish to reiterate the requests made in my letter on August 11th. Ms. Muder's reply to the update on August 5th indicated that the Corrective Action Plan has not addressed all of the issues outlined in previous correspondence. Though the CAP was submitted on June 24th, this email was the first and only indication that it was inadequate. Furthermore, these "outstanding concerns" were not listed or explained. I have not received a response to that August 11th letter.


UCM remains committed to working closely with the FAA to resolve the complaint. In accordance with FAA Order 5190.6B, section 2.9(b), we ask for "written clarification of the specific allegations being made, whether those have been substantiated by the FAA, what grant assurances have been determined to have been violated, if any, and how, and how specifically the actions UCM has taken and reported throughout this months-long process are being deemed insufficient to address any concerns that have been raised."

With that information in hand, we request a meeting that includes Mr. Joel, Ms. Muder, our counsel, and me so that UCM can provide the requested information and have a constructive dialogue that assists everyone in resolving the matter.

Furthermore, we have yet to receive any notification from the FAA that we have been placed in a zero-pay status for FAA grants. Thus, we ask for clarification on this issue as well.

These requests are all the more crucial as the complainants continue to share inaccurate information regarding the matter on social media and websites. This is disturbing since they have repeatedly rejected our invitations to discuss their concerns in person throughout this process.

Sincerely,

A handwritten signature in blue ink, reading "Douglas R. Davenport". The signature is fluid and cursive, with the first name "Douglas" and last name "Davenport" clearly legible.

Douglas R. Davenport, Ph.D.
Dean, Harmon College of Business and Professional Studies