

**THE PORT AUTHORITY OF NY & NJ**

FOI Administrator

December 23, 2015

Mr. Andrew Tangel  
The Wall Street Journal  
1211 Sixth Avenue, 5th Floor  
New York, NY 10036

Dear Mr. Tangel:

We are in receipt of your December 9, 2015 letter appealing the determination of the Freedom of Information Officer with regard to FOI Request #16274.

Upon further review, it has been determined that the attached documents are subject to release.

Please refer to the above FOI reference number in any future correspondence relating to your request.

Sincerely,



Danny Ng  
Freedom of Information Officer



March 31, 2015

Mr. John J. Degnan  
Chairman  
Port Authority of New York and New Jersey  
4 World Trade Center, 150 Greenwich Street  
New York, New York 10006

Dear Chairman Degnan:

As business leaders from the three largest cities in Upstate New York, we are writing to endorse the Port Authority's plan to thoroughly examine the perimeter rule that is currently in place at New York-LaGuardia airport. It is time to repeal this outdated measure.

As you know, the perimeter rule was tightened in 1984 to prevent flights to destinations greater than 1,500 miles from utilizing LaGuardia. While this rule made sense in 1984, it has become obsolete in 2015. Aviation technology has changed, allowing for quieter flights; and JFK and Newark Airports are much more competitive than they were 30 years ago.

Further, we are now in a truly global economy where increased connectivity within New York and beyond is crucial to making our entire state as competitive as possible. Rochester, Buffalo and Syracuse are three cities that exemplify this need. Rochester is now home to a burgeoning tech sector, Buffalo is seeing great economic growth and Syracuse has become a national leader in clean technology and sensor systems.

In order to continue growing in these emerging industries, upstate New Yorkers need to have frequent access to New York City and the west coast. Should the perimeter rule be lifted, LaGuardia would become a valuable connecting hub for upstate passengers traveling to California and other west coast destinations. This would also allow for increased capacity between upstate and New York City more closely aligning our cities and allowing for stronger economic ties across the state. With access to destinations beyond 1,500 miles, we have been assured that flights between upstate and LaGuardia will not be reduced.

Repeal of the perimeter rule would provide lasting economic benefits, creating more than 9,000 new jobs in New York, 2,200 of which would be outside out of New York City. It would also result in millions of dollars of increases in personal income, GDP and tax revenue.

Repealing the perimeter rule is an important part of revitalizing Upstate New York's economy and we hope the Port Authority removes this obsolete regulation.

Sincerely,

Dottie Gallagher-Cohen  
President and CEO  
Buffalo Niagara Partnership

Robert M. Simpson  
President  
CenterState Corporation for  
Economic Opportunity

Christopher S. Wiest  
Vice President, Public Policy &  
Advocacy  
Rochester Business Alliance

Cc: Patrick Foye, Executive Director, PANYNJ



27-01 Queens Plaza North  
Long Island City, NY 11101  
jetblue.com

March 2, 2015

Mr. Patrick J. Foye  
Executive Director  
The Port Authority of New York and New Jersey  
4 World Trade Center  
150 Greenwich Street, 18th Floor  
New York, NY 10006

Dear Pat:

On behalf of the 16,500 Crewmembers of JetBlue Airways, New York's Hometown Airline™, more than 6,000 of whom are based in New York State, I am writing to express our concern over press reports that the Port Authority has been studying a change in the longstanding perimeter rule at LaGuardia Airport. As the largest intra-state airline in New York and the largest domestic airline at JFK, we were particularly surprised to learn that this work has been done in consultation with only one airline.

Any change to or elimination of LaGuardia's perimeter rule after more than 30 years would represent a significant shift in policy that, in our view, requires the involvement of all the stakeholders – including all impacted airlines, local officials and especially the communities surrounding the airports. While outreach to these and other groups has not yet occurred, we are encouraged by the Port's commitment, as reported in The Wall Street Journal, that it will consult "with all interested parties in a public and transparent manner" and we look forward to actively participating in that process.

We urge you to consider the impact of any change in the perimeter rule in the context of the construction work already underway at LaGuardia, and more significantly, work planned in the coming years with the redevelopment of the Central Terminal Building. These projects, coupled with others which may emerge from Governor Cuomo's Master Plan Competition for the airport, will challenge airport and airline operations as well as all customers' experience at the airport for some time to come. A change in the perimeter rule would add an additional layer of traffic and complexity to an already challenging environment.

Additionally, it's important to consider how changing the perimeter rule would impact the competitive landscape at LaGuardia. Given the slot constraints at the airport, the Port should engage with the FAA to ensure availability of slots to operate beyond the perimeter are available to new entrants and limited incumbents at the airport.

In the years since JetBlue's first flight more than 15 years ago, we have seen the collective benefit – for the Port and airlines – of collaboration and partnership with the Port Authority. We urge you and your colleagues at the Port Authority to build on that record and look forward to engaging in this ongoing process.

Sincerely,

Jeffrey Goodell  
Vice President, Government and Airport Affairs

cc: Tom Bosco, Director of Aviation



Kate Gebo  
Vice President—  
Corporate Real Estate  
Phone: (872) 825-8603  
kate.gebo@united.com

March 17, 2015

Patrick J. Foye  
Executive Director  
The Port Authority of New York and New Jersey  
4 World Trade Center  
150 Greenwich Street  
New York, NY 10006

Re: Perimeter Rule at LaGuardia Airport

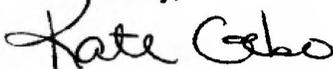
Dear Mr. Foye:

We recently read press reports indicating that the Port Authority of New York and New Jersey is studying a potential change to the Perimeter Rule at LaGuardia Airport and that any change would occur only after "thorough analysis" and consultation with all interested parties in a "public and transparent manner." Due to the significance of this issue to United we appreciate the Port Authority's commitment to such an approach and we look forward to being included in the process.

As you are aware, distance limitations on operations at LaGuardia have been in place for more than sixty years and any change to the Perimeter Rule would have significant impacts on air traffic, congestion and competition in the entire New York metropolitan region airspace, as well as significant impacts on air and ground traffic and noise in the immediate LaGuardia area. The New York/Newark metropolitan area already has two airports, Newark Liberty and Kennedy, that both serve destinations beyond the LaGuardia perimeter and where the local communities, businesses and airlines, including United, have made billions of dollars of long-term investments on the basis of serving those destinations. Changes to such a longstanding and well-settled rule, like the Perimeter Rule, require in-depth analysis and proper consideration of these types of issues.

I would be happy to meet you in your offices, at your earliest convenience, to better understand the process that the Port Authority intends to undertake in its review of the Perimeter Rule, the role and opportunity for input that United and other stakeholders will have in the process, and the opportunity to review any analysis or studies which have been or will be undertaken as part of this effort.

Sincerely,

  
Kate Gebo

cc: Tom Bosco, The Port Authority of New York and New Jersey  
David Kagan, The Port Authority of New York and New Jersey



May 7, 2015

Mr. John J. Degnan  
Chairman Port Authority of New York and New Jersey  
4 World Trade Center, 150 Greenwich Street  
New York, New York 10006

Dear Chairman Degnan:

I'm writing to encourage you to reconsider the Port Authority's support of the perimeter rule between John F. Kennedy Airport (JFK) and LaGuardia Airport (LGA) that has outlived its usefulness.

The Manhattan Chamber of Commerce (MCC) is the voice of over 100,000 companies operating in Manhattan, and serves as a key resource, particularly for small and mid-sized businesses in our borough. It's our position that the perimeter rule is bad for our airports, bad for business in New York City, and bad for the millions upon millions of visitors to New York each year who rely on airports like JFK and LGA.

As the central hub for tourism and commerce in New York City, Manhattan businesses are especially mindful making travel easier. In the past 15 years, our city has seen an increase in visitors of over 50 percent, hitting over 55 million visitors in total last year. By not allowing flights great than 1,500 miles from LaGuardia, we make New York City a less attractive and competitive travel hub. The adjustments last made to the perimeter rule in 1984 no longer work in 2015.

But it's not simply tourism. If we want our city and state to truly become a global market for technology, green business, and heavy manufacturing, our airports and policies need to evolve with changing times. These businesses need access to the West Coast that isn't limited by artificial barriers.

We stand with cities like Buffalo, Syracuse, and Rochester that have made their support to end this rule clear. The increased slots at LaGuardia that would come about from removing the perimeter rule will spur job growth, tourism, and increase economic opportunities across our city and region, without negatively impacting JFK or other regional airports.

Chairman Degnan, make the right choice and seriously consider repealing the perimeter rule. It will not only benefit business in Manhattan and New York City, but all across New York State.

Sincerely,

Nancy Ploeger  
President  
Manhattan Chamber of Commerce

c.c. Patrick Foye, Executive Director, PANYNJ

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**ESTABLISHED IN 1920**

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# Queens Chamber of Commerce

Albert F. Pennisi, President  
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Mayra DiRico, Treasurer  
Vincent Petraro, Secretary  
Jack Friedman, Executive Director

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info@queenschamber.org

June 23, 2015

Chairman John J. Degnan  
Port Authority of New York and New Jersey  
4 World Trade Center, 150 Greenwich Street  
New York, New York 10006

Dear Chairman Degnan,

As the President of the Queens Chamber of Commerce, I know just how much of a role airports play in generating growth. Queens is the home of both LaGuardia (LGA) and John F. Kennedy (JFK) Airports, two of the largest and most important air travel hubs in the country. They are truly the lifeblood of our borough, sustaining thousands of jobs and generating millions in economic activity.

Unfortunately, LGA has long been restrained from realizing its full potential by a regulation that no longer makes sense in our modern day and age. The perimeter rule, first adopted in the middle of last century and tightened in 1984, prevents flights departing LGA to go farther than 1,500 miles. As a result, the airport cannot service flights to California and other diverse destinations in the Western United States.

The perimeter rule is a growing irritant for businesses in Queens, which are increasingly dependent on global markets and global travel. From large corporations like Citigroup to small mom-and-pop stores in Jackson Heights and Flushing, all Queens businesses feel the negative impacts of the perimeter rule in ways large and small. Particularly as Queens grows in attractiveness for tourism, we're particularly mindful that ease of transportation is a key driver of decisions for travelers.

If these restrictions on LGA continue, they will hinder Queens businesses. We urge the Port Authority to take a second look at this rule and revise it to reflect the modern demands of the marketplace. Doing so would give a great boost to our borough.

Sincerely,



Albert F. Pennisi  
President, Queens Chamber of Commerce

c.c. Patrick Foye Executive Director, PANYNJ



Association for a Better New York  
455 Lexington Avenue  
New York, NY 10017

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[www.abny.org](http://www.abny.org)

July 6, 2015

Mr. John Degnan  
Chairman  
Port Authority of New York and New Jersey  
4 World Trade Center, 150 Greenwich Street  
New York, New York 10006

Dear Chairman Degnan:

The Association for a Better New York (ABNY) is among the city's longest standing civic organizations advocating for the policies, programs and projects that make New York a better place to live, work and visit. We represent the broad fabric of New York's economy and our membership includes New York's most influential businesses, not-for-profits, arts & culture organizations, educational institutions, labor unions and entrepreneurs.

ABNY supports the relaxation of the 1,500 Perimeter Rule currently in place at LaGuardia Airport. The Perimeter Rule, enacted decades ago, is no longer an effective tool in meeting the demands of a 21<sup>st</sup> century global economy. New York City's population and visitor numbers are at all-time highs, and there is a much a greater demand for longer-haul flights to major centers of commerce on the West Coast and other destinations farther away from New York. It is time to revisit LaGuardia's ability to meet these new realities.

Reevaluating and potentially lifting the Perimeter Rule stands to provide many substantial benefits to LaGuardia passengers as well as to New York residents more broadly. For example, passengers would no longer have to choose between losing time on connecting flights when they leave from LaGuardia and facing longer ground travel for direct flights to their destinations from Kennedy or Newark. Additionally, a projected 12,600 new jobs, with average annual salaries estimated at \$50,000, are expected to be gained from the increased passenger movement through LaGuardia due to higher efficiencies gained from using larger aircraft at more slot times. These jobs are expected to generate \$1.2 billion in incremental personal income and stimulate \$3.4 billion in additional GDP annually. Furthermore, LaGuardia will finally become a true competitor to John F. Kennedy and Newark, both of which have grown substantially over the past 20 years and become global hubs. The benefits of lifting the Perimeter Rule will be felt far beyond New York City, too. Upstate New York markets will realize substantial benefits with a projected 40% increase in connections to the West Coast, creating additional routing options through LaGuardia.

Thank you for your efforts to address this important issue that is impacting the quality of life in New York for so many workers, residents, and visitors. Please don't hesitate to reach out with any questions.

Sincerely,



Jennifer Hensley  
Executive Director

CC: Pat Foye, Port Authority of New York & New Jersey



JOSEPH D. MORELLE  
Majority Leader

THE ASSEMBLY  
STATE OF NEW YORK  
ALBANY

August 3, 2015

Mr. John Degnan  
Chairman  
Port Authority of New York and New Jersey  
4 World Trade Center, 150 Greenwich Street  
New York, New York 10006

Mr. Patrick Foye  
Executive Director  
Port Authority of New York and New Jersey  
4 World Trade Center, 150 Greenwich Street  
New York, New York 10006

Dear Chairman Degnan and Director Foye:

We wish to express our strong opposition to the possible lifting of the 1,500 mile perimeter rule at New York's LaGuardia International Airport by the Port Authority of New York and New Jersey.

At present, the perimeter rule assures the safe operation of airline services in the congested airspace in the New York/New Jersey region, while providing a critical mechanism for serving regional markets in the Northeast, including Upstate New York. Chapter VIII, Part U, Section 16 of the Airport Rules and Regulations currently provides that:

*"LaGuardia Airport is to be utilized for nonstop domestic flights and international flights pre-cleared by the Federal Inspection Services only to and from points that are located within 1,500 statute miles of LaGuardia Airport, and to and from Denver, CO. The foregoing limitation does not apply to flight operations conducted on Saturdays or to general aviation operations conducted at the Marine Air Terminal."*

Should the perimeter rule be lifted, there is the strong likelihood that airlines will transition their limited slots at LaGuardia away from Upstate cities towards more lucrative long haul flights originating on the West Coast or abroad. This action would result in Upstate airports experiencing a reduction in flights and increased fares as a result of airlines abandoning regional airports for more profitable destinations.

Further, the number of flights permitted to land and take-off from LaGuardia Airport is regulated by the Federal Aviation Administration. In the congested New York airspace it is highly unlikely that permission will be granted for additional flights at LaGuardia.

Chairman Degnan and Director Foye

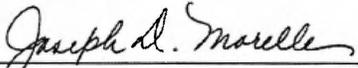
August 3, 2015

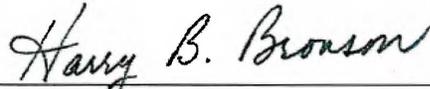
Page 2

In the 21st century economy, Upstate New York depends on the ability to move goods and employees in a reliable and affordable way. According to a New York State Department of Transportation study, Upstate airports directly and indirectly account for 48,000 jobs, over \$4 billion in annual economic activity and pay over \$2.5 billion in state and local taxes. A reduction of flights across Upstate New York will dramatically impair our ability to compete for jobs in an increasingly global economy.

We strongly oppose the lifting of LaGuardia's perimeter rule and encourage the Port Authority's Board of Commissioners to consider these impacts and do the same. Thank you in advance for your consideration.

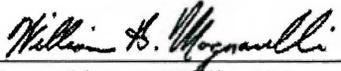
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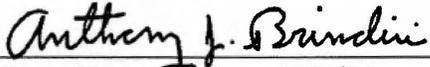
  
Majority Leader Joseph D. Morelle ✓

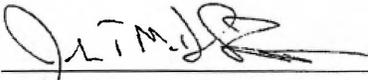
  
Assemblyman Harry Bronson ✓

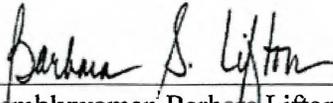
  
Assemblymember Patricia Fahey ✓

  
Assemblywoman Donna Lupardo ✓

  
Assemblyman William Magnarelli ✓

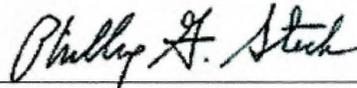
  
Assemblyman Anthony Brindisi ✓

  
Assemblyman John McDonald ✓

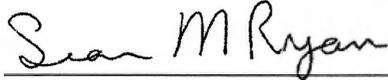
  
Assemblywoman Barbara Lifton ✓



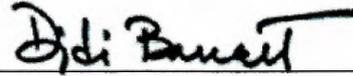
Assemblyman Bill Magee ✓



Assemblyman Phil Steck ✓



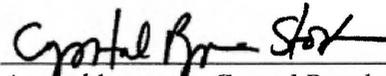
Assemblyman Sean Ryan ✓



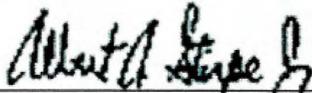
Assemblymember Didi Barrett ✓



Assemblywoman Addie Russell ✓



Assemblywoman Crystal Peoples-Stokes ✓



Assemblyman Al Stirpe ✓



Assemblymember Carrie Woerner ✓



Assemblyman Angelo Santabarbra ✓

Cc: Scott Rechler

Richard Bagger

Steven Cohen

Michael Fascitelli

Hamilton James

George Laufenberg

Kenneth Lipper

Jeffrey Lynford

Raymond Pocino

William Schuber

David S. Steiner



31-00 47<sup>th</sup> Ave., #1105  
Long Island City, NY 11101

347 841 6090  
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@C4QNYC

June 2, 2015

Chairman John J. Degnan  
Port Authority of New York and New Jersey  
4 World Trade Center, 150 Greenwich Street  
New York, New York 10006

Dear Chairman Degnan,

As Executive Director of The Coalition for Queens, I recognize and appreciate the vital role airports play in generating economic activity in the region. This is most evident in Queens where we are fortunate enough to host two of the busiest travel hubs in the country - LaGuardia and JFK.

Both serve as key economic engines in our borough, sustaining thousands of jobs and generating millions in economic activity.

However, LaGuardia is currently falling short of its true potential by being held to an antiquated perimeter rule restricting the airport to service flights to locations in the Western U.S.

This rule impedes businesses including the burgeoning tech community that is rapidly growing and expanding in Queens and many view as the critical component to Queens' future economic health.

I am writing to let you know of the Coalition For Queens' support to lift the perimeter rule that will allow departing flights leaving LaGuardia the ability to exceed a 1,500 mile trip. A change to this rule will bring the opportunity for an increased \$1.2 billion in incremental personal income to the region.<sup>†</sup>

Lifting this rule is crucial to not only Queens, but also to the competitiveness of the entire state. I would urge the Port to act promptly.



31-00 47<sup>th</sup> Ave., #1105  
Long Island City, NY 11101

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Thank you for your attention in this matter.

Sincerely,

Jukay Hsu  
Executive Director for Coalition for Queens



Edward H. Bastian  
President

March 23, 2015

Mr. John J. Degnan  
Chairman  
Port Authority of New York and New Jersey  
4 World Trade Center, 150 Greenwich Street  
New York, New York 10006

Dear Chairman Degnan,

On behalf of Delta Air Lines, I am writing in support of the recent initiative taken by the Port Authority of New York & New Jersey ("Port Authority") to review the perimeter rule at New York-LaGuardia ("LGA").

Delta has long been an enthusiastic supporter of the Port Authority's efforts to create an airport system for the 21<sup>st</sup> century, and the removal of the perimeter rule is in lockstep with these efforts to update and transform New York's airports.

The removal of the rule is not a new idea: There have been multiple calls for its elimination since its implementation in 1984. The rule's original objective—essentially, to build and strengthen JFK Airport—has more than been met over the past 30 years. JFK is now an established international gateway to the world, with more than 70 carriers serving local and connecting passengers. Multiple airlines have invested billions of dollars into infrastructure at the airport, solidifying their commitments to JFK as a strategic hub in New York.

This would not have been possible without the partnership between the airline industry and the Port Authority. Now is the time to take similarly bold and progressive steps at LaGuardia on behalf of the millions of people in the region who would benefit from the lifting of the perimeter rule.

Under the constraints of the perimeter rule, just 7 percent of flights at LGA utilize aircraft with 150 or more seats. That comes at a cost to passengers who want more choices and convenience. Airlines, meanwhile, can't match capacity with the demand, and the Port Authority can't maximize its limited slot portfolio.

Eliminating the perimeter rule will give customers the ability to choose how and where they fly and allow carriers to match capacity with that demand.

This is especially important for business travel, a segment that is critical to the region's economy. Today, more than one-third of the region's total annual corporate account spending on domestic travel is for destinations beyond the 1,500-mile perimeter. For some of the region's most important industries, that percentage of spending is even higher: 55 percent for media and entertainment, 38 percent for banking and finance and 35 percent for technology and communications.

Lifting the perimeter rule also would serve the economy of the entire state of New York. Residents in places such as Syracuse stand to gain 40 percent more connectivity to the West Coast. This will deliver incremental growth and drive investment in the region by providing access to those places where the region's economic ties are strongest.

Delta's investments in its LGA terminals, along with the slot swap, have demonstrated significant value to consumers, the region and the Port without hurting JFK. The elimination of the perimeter rule will further help these efforts by allowing customer demand to settle where it should at the region's three airports.

There are precedents in other markets. The recent repeal of the Wright Amendment and the partial lifting of restrictions of long-haul flying at Washington, D.C.'s Reagan National Airport ("DCA") are clear examples of adjusting regulations to meet consumer demand. In these cases, no airline flooded the market with capacity and no small city lost service.

Perimeter restrictions at DCA were lifted in select markets from 2000 to 2012. An analysis conducted by the GAO in 2007, reported that markets beyond the perimeter that gained DCA flights increased 4.4 percent above the average regional growth trend. This growth was additive to the market – it did not come at the expense of BWI or Dulles airports. The GAO report "did not find evidence that Dulles and BWI traffic or fares were affected by the beyond perimeter flights to DCA." Furthermore, it concluded, "Statutory restrictions such as the perimeter rule contribute to the underutilization of slots and prevent market forces from producing the maximum public benefit from the scarce assets."

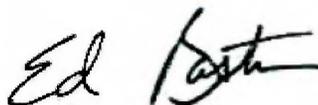
While the lifting of the Wright Amendment is in its early stages, multiple analyses predict similar benefits for both the use of assets as well as significant customer benefits. These include: 2,000-6,000 new jobs by 2020 and 3.7 million new one-way passengers. These analyses also predict fares will fall because of new competition.

Delta has made it clear that no small city will lose service to NYC if the perimeter rule is lifted. To be clear, removal of the perimeter rule at LGA would simply allow the airlines to take the same number of daily slots at each airport and allocate those slots to the airport that best serve true demand. And most importantly, passengers would have the freedom to decide their preferred airport.

Ultimately, passengers are the true beneficiaries of any efforts to modernize the region's airports. We want to provide customers with an experience that best represents New York. Over the past 30 years, we've witnessed advancements in technology and a natural evolution in travel. Industries around us have grown and changed. As a result, we support the Port Authority's efforts to re-evaluate the perimeter rule at LGA. We believe eliminating it will deliver substantial economic benefits to the NY and NJ region, allow the more efficient use of limited slots, and better match routes with current passenger demand.

We look forward to the Port Authority's decision on this matter in the coming weeks.

Sincerely,



Ed Bastian  
President  
Delta Air Lines

CC: Patrick Foye, Executive Director, PANYNJ ✓



March 12, 2015

The Honorable John J. Degnan  
Chairman  
The Port Authority of New York & New Jersey  
225 Park Avenue South  
New York, New York 10003

Mr. Patrick J. Foye  
Executive Director  
The Port Authority of New York & New Jersey  
225 Park Avenue South  
New York, New York 10003

Re: Alaska Airlines, Inc.—Potential Opening of the LGA Perimeter Rule

Dear Mr. Chairman & Executive Director:

Alaska would welcome the opportunity to meet with you and members of your staff to discuss Alaska's interest in the opportunity to provide nonstop service from LaGuardia Airport (LGA) to cities on the West Coast. That service would require a change in the longstanding LGA perimeter rule and Alaska is still evaluating all of the potential consequences of such a change. Alaska's overarching concern is that any change be enacted only if smaller carriers, including those such as Alaska which currently do not serve LGA, are afforded a fair and reasonable opportunity to provide beyond-perimeter service.

Alaska will commence JFK-Seattle service later this year after years of seeking commercially viable JFK slots. Alaska also operates twice daily Newark-Seattle service. Alaska plans to devote substantial resources to the successful development of its new JFK-Seattle service. Alaska has similarly developed a number of East-West transcontinental markets, including service to Seattle, Portland and Los Angeles from slot-restricted Reagan National Airport in the Nation's Capital. Alaska has also consistently been one of the most efficient users of slots at Reagan National measured, among others, in terms of seats per flight and load factor. Alaska has every intention of applying the same metrics to any new LGA service should the opportunity arise.

Alaska's many accomplishments are particularly noteworthy since Alaska is only the 6<sup>th</sup> largest US carrier with a domestic market share of 4 percent. Alaska is also the *only* carrier with pre-deregulation origins, dating back to 1932, never to have filed for bankruptcy or gone out of business. Alaska is one of only two US carriers to currently hold an investment grade rating.

Alaska hopes that the Port Authority shares Alaska's concern that smaller carriers, including new entrants, have a full and equal opportunity to participate in any opening of the LGA perimeter rule. The

three largest LGA slot holders presently control 88% of all US carrier departures at LaGuardia. These same carriers also comprise 72% of all departures from the three principal New York City airports. These carriers would be able to increase their dominance in the New York area and the overall domestic market unless an opening of the LGA perimeter rule was conditioned on smaller carriers, including new entrants, having no less than an equal opportunity to provide the same level of service.

Alaska appreciates that any change to the LGA perimeter rule presents a host of challenges for the Port Authority. Alaska looks forward to the opportunity to discuss this issue with you and members of your staff.

Sincerely,

A handwritten signature in black ink, appearing to read "Andrew Harrison", followed by a long horizontal line extending to the right.

Andrew Harrison  
EVP & Chief Revenue Officer

cc: Mr. Thomas L. Bosco  
Aviation Director



ALBANY COUNTY AIRPORT AUTHORITY  
ALBANY INTERNATIONAL AIRPORT  
ADMINISTRATION BUILDING  
SUITE 200  
ALBANY, NEW YORK 12211-1057

TEL: 518-242-2222  
ADMIN FAX: 518-242-2641  
FINANCE FAX: 518-242-2640  
SITE: [www.flyalbany.com](http://www.flyalbany.com)

August 3, 2015

Honorable Andrew Cuomo  
Governor, New York State  
State Capitol  
Albany, New York 12224

Dear Governor Cuomo:

As the Port Authority of New York and New Jersey considers lifting the 1,500 mile perimeter rule at New York's LaGuardia International Airport, we ask you to consider the potential impact on upstate New York air service and the upstate economy.

According to our air service consultants, the Albany International Airport would not experience significant changes to our flights based upon the rule change. Other upstate airports including Syracuse, Rochester and Buffalo would, in all likelihood, undergo a reduction in service to LaGuardia Airport. The airlines would replace the short haul upstate New York service with more profitable long haul service utilizing larger aircraft. These changes would come quickly as smaller regional jets providing service to upstate airports are replaced with full sized jets headed for the west coast. It is not inconceivable that some upstate cities would lose all service to NYC. In recent years, Albany International Airport lost all LaGuardia service due to slot reassignment. The airlines traded low yielding flights for high yielding flights.

The potential reduction in air service will change the way upstate cities are viewed by businesses. All business sectors from nanotechnology to finance located in upstate cities look for flights to NYC to conduct business or to make connection to international destinations. Albany is a little over two hours from NYC by train or auto, but the other upstate cities are much further away and losing air service would severely impact these cities ability to attract new businesses and retain their current businesses.

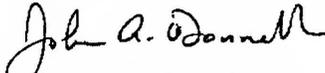
Honorable Andrew Cuomo

August 3, 2015

Page -2-

We strongly encourage you to continue to be the great advocate for the upstate economy as the lifting of the perimeter rule is considered. If we can be of any further assistance, please do not hesitate to contact us. Thank you in advance for your consideration.

Sincerely,



John A. O'Donnell  
Chief Executive Officer

JAO:lmc

cc: Hon. Neil D. Breslin, 44<sup>th</sup> Senate District  
Hon. Phillip G. Steck, NYS Assembly District 110  
Hon. John T. McDonald, III, NYS Assembly District 108  
Hon. Patricia Fahy, NYS Assembly District 109  
Peter F. Stuto, General Counsel, ACAA  
Bill O'Reilly, CFO, ACAA



EDWARD C. BRAUNSTEIN  
Assemblyman 26<sup>th</sup> District  
Queens County

THE ASSEMBLY  
STATE OF NEW YORK  
ALBANY

CHAIRMAN  
Subcommittee on Trust and Estates  
COMMITTEES  
Aging  
Cities  
Health  
Insurance  
Judiciary  
Small Business

August 12, 2015

Hon. Andrew M. Cuomo, Governor  
New York State Capitol Building  
Albany, NY 12224

Dear Governor Cuomo:

It has recently come to our attention that the Port Authority of New York and New Jersey is considering lifting the perimeter rule at LaGuardia Airport. We are writing to express our opposition to such a change, as it would have a detrimental impact on communities in New York City and Nassau County that are already suffering from increased air traffic over the last few years.

Allowing for flights longer than 1500 miles will result in heavier planes departing from LaGuardia Airport because of the extra fuel reserves needed for those flights. Our research indicates that heavier planes take longer to reach higher altitudes, and therefore are closer to the ground for a longer time during departure. This may result in an increase in airplane noise for the neighborhoods under these flight paths.

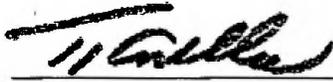
Additionally, the Port Authority has begun the process of conducting a Part 150 study that will determine the impact of the new RNAV procedures the FAA began to implement in 2012. We should, at the very least, wait to see the results of the Part 150 study before we begin adding heavier and louder planes.

The residents of Queens and Nassau deserve the quiet enjoyment of their homes. Already the recently instituted RNAV procedures are having a significant detrimental impact on many communities. Lifting the perimeter rule would compound this problem and would further diminish the quality of life for many New Yorkers.

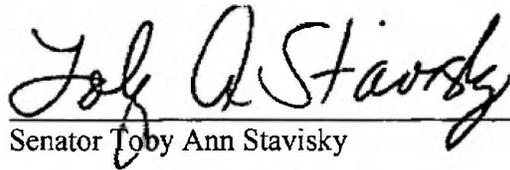
Thank you for your time and attention to this matter. We look forward to your response.

Sincerely,

Assemblyman Edward C. Braunstein



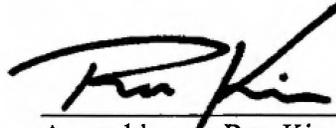
Senator Tony Avella



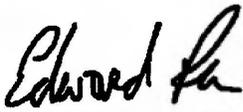
Senator Toby Ann Stavisky



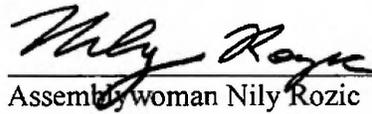
Assemblyman Michael DenDekker



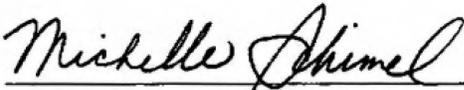
Assemblyman Ron Kim



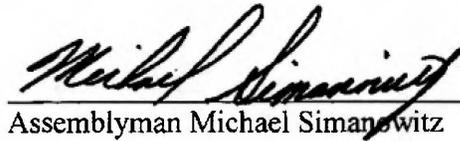
Assemblyman Edward Ra



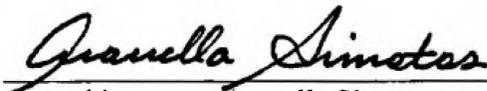
Assemblywoman Nily Rozic



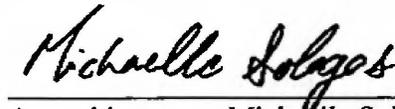
Assemblywoman Michelle Schimel



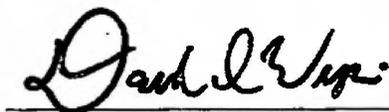
Assemblyman Michael Simanowitz



Assemblywoman Aravella Simotas



Assemblywoman Michaelle Solages



Assemblyman David Weprin



THE ASSEMBLY  
STATE OF NEW YORK  
ALBANY

JOSEPH D. MORELLE  
Majority Leader

August 3, 2015

The Honorable Andrew Cuomo  
Governor, New York State  
State Capitol  
Albany, NY 12224

Dear Governor Cuomo:

We wish to express our strong opposition to the possible lifting of the 1,500 mile perimeter rule at New York's LaGuardia International Airport by the Port Authority of New York and New Jersey.

Thanks to your leadership, Upstate New York is experiencing an economic resurgence. Lifting the perimeter rule runs counter to the progress we have enjoyed and future growth opportunities. We urge you to use your influence to stop this proposed policy change.

Currently, the Port Authority is studying the perimeter rule, which limits the distance traveled by flights out of LaGuardia to no more than 1,500 miles, to determine if it remains in the best interest of the state's air travelers. At present, the perimeter rule assures the safe operation of airline services in the congested airspace in the New York/New Jersey region, while providing a critical mechanism for serving regional markets in the Northeast, including Upstate New York.

Should the perimeter rule be lifted, there is the strong likelihood that airlines will transition their limited slots at LaGuardia away from Upstate cities towards more lucrative long haul flights originating on the West Coast or abroad. This action would result in Upstate airports experiencing a reduction in flights and increased fares as a result of airlines abandoning regional airports for more profitable destinations.

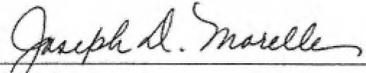
Further, the number of flights permitted to land and take-off from LaGuardia Airport is regulated by the Federal Aviation Administration. In the congested New York airspace it is highly unlikely that permission will be granted for additional flights at LaGuardia.

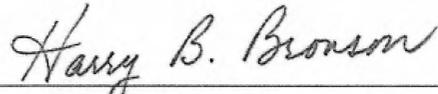
In the 21st century economy, Upstate New York depends on the ability to move goods and employees in a reliable and affordable way. According to a New York State Department of Transportation study, Upstate airports directly and indirectly account for 48,000 jobs, over \$4 billion in annual economic activity and pay over \$2.5 billion in state and local taxes. A reduction of flights across Upstate New York will dramatically impair our ability to compete for jobs in an increasingly global economy.

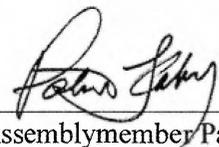
Governor Cuomo  
August 3, 2015  
Page 2

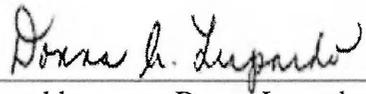
We remain grateful for your continued focus on Upstate New York and ask that you consider the harmful impact the lifting of the perimeter rule would have on our local economies. We would embrace the opportunity to partner with you in protecting Upstate's best interest. Thank you in advance for your consideration.

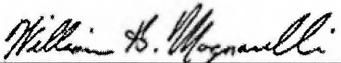
Sincerely,

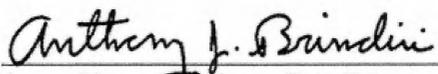
  
Majority Leader Joseph D. Morelle

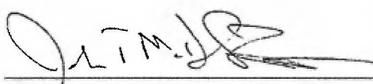
  
Assemblyman Harry Bronson

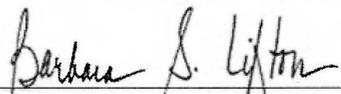
  
Assemblymember Patricia Fahey

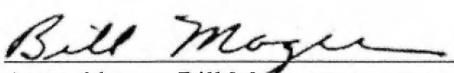
  
Assemblywoman Donna Lupardo

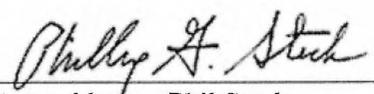
  
Assemblyman William Magnarelli

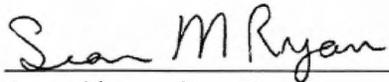
  
Assemblyman Anthony Brindisi

  
Assemblyman John McDonald

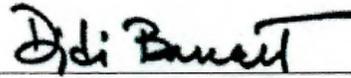
  
Assemblywoman Barbara Lifton

  
Assemblyman Bill Magee

  
Assemblyman Phil Steck



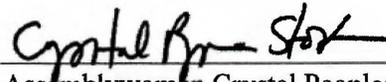
Assemblyman Sean Ryan



Assemblymember Didi Barrett



Assemblywoman Addie Russell



Assemblywoman Crystal Peoples-Stokes



Assemblyman Al Stirpe



Assemblymember Carrie Woerner



Assemblyman Angelo Santabarbara



March 31, 2015

Mr. John J. Degnan  
Chairman  
Port Authority of New York and New Jersey  
4 World Trade Center, 150 Greenwich Street  
New York, New York 10006

Dear Chairman Degnan:

As business leaders from the three largest cities in Upstate New York, we are writing to endorse the Port Authority's plan to thoroughly examine the perimeter rule that is currently in place at New York-LaGuardia airport. It is time to repeal this outdated measure.

As you know, the perimeter rule was tightened in 1984 to prevent flights to destinations greater than 1,500 miles from utilizing LaGuardia. While this rule made sense in 1984, it has become obsolete in 2015. Aviation technology has changed, allowing for quieter flights; and JFK and Newark Airports are much more competitive than they were 30 years ago.

Further, we are now in a truly global economy where increased connectivity within New York and beyond is crucial to making our entire state as competitive as possible. Rochester, Buffalo and Syracuse are three cities that exemplify this need. Rochester is now home to a burgeoning tech sector, Buffalo is seeing great economic growth and Syracuse has become a national leader in clean technology and sensor systems.

In order to continue growing in these emerging industries, upstate New Yorkers need to have frequent access to New York City and the west coast. Should the perimeter rule be lifted, LaGuardia would become a valuable connecting hub for upstate passengers traveling to California and other west coast destinations. This would also allow for increased capacity between upstate and New York City more closely aligning our cities and allowing for stronger economic ties across the state. With access to destinations beyond 1,500 miles, we have been assured that flights between upstate and LaGuardia will not be reduced.

Repeal of the perimeter rule would provide lasting economic benefits, creating more than 9,000 new jobs in New York, 2,200 of which would be outside out of New York City. It would also result in millions of dollars of increases in personal income, GDP and tax revenue.

Repealing the perimeter rule is an important part of revitalizing Upstate New York's economy and we hope the Port Authority removes this obsolete regulation.

Sincerely,

Dottie Gallagher-Cohen  
President and CEO  
Buffalo Niagara Partnership

Robert M. Simpson  
President  
CenterState Corporation for  
Economic Opportunity

Christopher S. Wiest  
Vice President, Public Policy &  
Advocacy  
Rochester Business Alliance

Cc: Patrick Foye, Executive Director, PANYNJ



27-01 Queens Plaza North  
Long Island City, NY 11101  
jetblue.com

March 2, 2015

Mr. Patrick J. Foye  
Executive Director  
The Port Authority of New York and New Jersey  
4 World Trade Center  
150 Greenwich Street, 18th Floor  
New York, NY 10006

Dear Pat:

On behalf of the 16,500 Crewmembers of JetBlue Airways, New York's Hometown Airline™, more than 6,000 of whom are based in New York State, I am writing to express our concern over press reports that the Port Authority has been studying a change in the longstanding perimeter rule at LaGuardia Airport. As the largest intra-state airline in New York and the largest domestic airline at JFK, we were particularly surprised to learn that this work has been done in consultation with only one airline.

Any change to or elimination of LaGuardia's perimeter rule after more than 30 years would represent a significant shift in policy that, in our view, requires the involvement of all the stakeholders – including all impacted airlines, local officials and especially the communities surrounding the airports. While outreach to these and other groups has not yet occurred, we are encouraged by the Port's commitment, as reported in The Wall Street Journal, that it will consult "with all interested parties in a public and transparent manner" and we look forward to actively participating in that process.

We urge you to consider the impact of any change in the perimeter rule in the context of the construction work already underway at LaGuardia, and more significantly, work planned in the coming years with the redevelopment of the Central Terminal Building. These projects, coupled with others which may emerge from Governor Cuomo's Master Plan Competition for the airport, will challenge airport and airline operations as well as all customers' experience at the airport for some time to come. A change in the perimeter rule would add an additional layer of traffic and complexity to an already challenging environment.

Additionally, it's important to consider how changing the perimeter rule would impact the competitive landscape at LaGuardia. Given the slot constraints at the airport, the Port should engage with the FAA to ensure availability of slots to operate beyond the perimeter are available to new entrants and limited incumbents at the airport.

In the years since JetBlue's first flight more than 15 years ago, we have seen the collective benefit – for the Port and airlines – of collaboration and partnership with the Port Authority. We urge you and your colleagues at the Port Authority to build on that record and look forward to engaging in this ongoing process.

Sincerely,

Jeffrey Goodell  
Vice President, Government and Airport Affairs

cc: Tom Bosco, Director of Aviation



Kate Gebo  
Vice President—  
Corporate Real Estate  
Phone: (872) 825-8603  
kate.gebo@united.com

March 17, 2015

Patrick J. Foye  
Executive Director  
The Port Authority of New York and New Jersey  
4 World Trade Center  
150 Greenwich Street  
New York, NY 10006

Re: Perimeter Rule at LaGuardia Airport

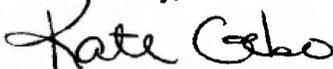
Dear Mr. Foye:

We recently read press reports indicating that the Port Authority of New York and New Jersey is studying a potential change to the Perimeter Rule at LaGuardia Airport and that any change would occur only after "thorough analysis" and consultation with all interested parties in a "public and transparent manner." Due to the significance of this issue to United we appreciate the Port Authority's commitment to such an approach and we look forward to being included in the process.

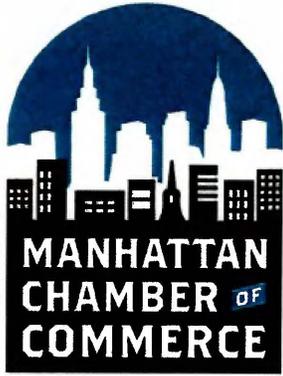
As you are aware, distance limitations on operations at LaGuardia have been in place for more than sixty years and any change to the Perimeter Rule would have significant impacts on air traffic, congestion and competition in the entire New York metropolitan region airspace, as well as significant impacts on air and ground traffic and noise in the immediate LaGuardia area. The New York/Newark metropolitan area already has two airports, Newark Liberty and Kennedy, that both serve destinations beyond the LaGuardia perimeter and where the local communities, businesses and airlines, including United, have made billions of dollars of long-term investments on the basis of serving those destinations. Changes to such a longstanding and well-settled rule, like the Perimeter Rule, require in-depth analysis and proper consideration of these types of issues.

I would be happy to meet you in your offices, at your earliest convenience, to better understand the process that the Port Authority intends to undertake in its review of the Perimeter Rule, the role and opportunity for input that United and other stakeholders will have in the process, and the opportunity to review any analysis or studies which have been or will be undertaken as part of this effort.

Sincerely,

  
Kate Gebo

cc: Tom Bosco, The Port Authority of New York and New Jersey  
David Kagan, The Port Authority of New York and New Jersey



May 7, 2015

Mr. John J. Degnan  
Chairman Port Authority of New York and New Jersey  
4 World Trade Center, 150 Greenwich Street  
New York, New York 10006

Dear Chairman Degnan:

I'm writing to encourage you to reconsider the Port Authority's support of the perimeter rule between John F. Kennedy Airport (JFK) and LaGuardia Airport (LGA) that has outlived its usefulness.

The Manhattan Chamber of Commerce (MCC) is the voice of over 100,000 companies operating in Manhattan, and serves as a key resource, particularly for small and mid-sized businesses in our borough. It's our position that the perimeter rule is bad for our airports, bad for business in New York City, and bad for the millions upon millions of visitors to New York each year who rely on airports like JFK and LGA.

As the central hub for tourism and commerce in New York City, Manhattan businesses are especially mindful making travel easier. In the past 15 years, our city has seen an increase in visitors of over 50 percent, hitting over 55 million visitors in total last year. By not allowing flights great than 1,500 miles from LaGuardia, we make New York City a less attractive and competitive travel hub. The adjustments last made to the perimeter rule in 1984 no longer work in 2015.

But it's not simply tourism. If we want our city and state to truly become a global market for technology, green business, and heavy manufacturing, our airports and policies need to evolve with changing times. These businesses need access to the West Coast that isn't limited by artificial barriers.

We stand with cities like Buffalo, Syracuse, and Rochester that have made their support to end this rule clear. The increased slots at LaGuardia that would come about from removing the perimeter rule will spur job growth, tourism, and increase economic opportunities across our city and region, without negatively impacting JFK or other regional airports.

Chairman Degnan, make the right choice and seriously consider repealing the perimeter rule. It will not only benefit business in Manhattan and New York City, but all across New York State.

Sincerely,

Nancy Ploeger  
President  
Manhattan Chamber of Commerce

c.c. Patrick Foye, Executive Director, PANYNJ

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# Queens Chamber of Commerce

Albert F. Pennisi, President  
Terri Thomson, First Vice President  
Mayra DiRico, Treasurer  
Vincent Petraro, Secretary  
Jack Friedman, Executive Director

75-20 Astoria Boulevard, Suite 140  
Jackson Heights, NY 11370  
P: 718.898.8500  
F: 718.898.8599  
info@queenschamber.org

June 23, 2015

Chairman John J. Degnan  
Port Authority of New York and New Jersey  
4 World Trade Center, 150 Greenwich Street  
New York, New York 10006

Dear Chairman Degnan,

As the President of the Queens Chamber of Commerce, I know just how much of a role airports play in generating growth. Queens is the home of both LaGuardia (LGA) and John F. Kennedy (JFK) Airports, two of the largest and most important air travel hubs in the country. They are truly the lifeblood of our borough, sustaining thousands of jobs and generating millions in economic activity.

Unfortunately, LGA has long been restrained from realizing its full potential by a regulation that no longer makes sense in our modern day and age. The perimeter rule, first adopted in the middle of last century and tightened in 1984, prevents flights departing LGA to go farther than 1,500 miles. As a result, the airport cannot service flights to California and other diverse destinations in the Western United States.

The perimeter rule is a growing irritant for businesses in Queens, which are increasingly dependent on global markets and global travel. From large corporations like Citigroup to small mom-and-pop stores in Jackson Heights and Flushing, all Queens businesses feel the negative impacts of the perimeter rule in ways large and small. Particularly as Queens grows in attractiveness for tourism, we're particularly mindful that ease of transportation is a key driver of decisions for travelers.

If these restrictions on LGA continue, they will hinder Queens businesses. We urge the Port Authority to take a second look at this rule and revise it to reflect the modern demands of the marketplace. Doing so would give a great boost to our borough.

Sincerely,



Albert F. Pennisi  
President, Queens Chamber of Commerce

c.c. Patrick Foye Executive Director, PANYNJ



Association for a Better New York  
455 Lexington Avenue  
New York, NY 10017

T 212.370.5809

F 212.661.5877

[www.abny.org](http://www.abny.org)

July 6, 2015

Mr. John Degnan  
Chairman  
Port Authority of New York and New Jersey  
4 World Trade Center, 150 Greenwich Street  
New York, New York 10006

Dear Chairman Degnan:

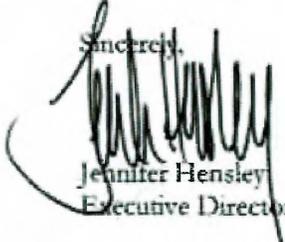
The Association for a Better New York (ABNY) is among the city's longest standing civic organizations advocating for the policies, programs and projects that make New York a better place to live, work and visit. We represent the broad fabric of New York's economy and our membership includes New York's most influential businesses, not-for-profits, arts & culture organizations, educational institutions, labor unions and entrepreneurs.

ABNY supports the relaxation of the 1,500 Perimeter Rule currently in place at LaGuardia Airport. The Perimeter Rule, enacted decades ago, is no longer an effective tool in meeting the demands of a 21<sup>st</sup> century global economy. New York City's population and visitor numbers are at all-time highs, and there is a much a greater demand for longer-haul flights to major centers of commerce on the West Coast and other destinations farther away from New York. It is time to revisit LaGuardia's ability to meet these new realities.

Reevaluating and potentially lifting the Perimeter Rule stands to provide many substantial benefits to LaGuardia passengers as well as to New York residents more broadly. For example, passengers would no longer have to choose between losing time on connecting flights when they leave from LaGuardia and facing longer ground travel for direct flights to their destinations from Kennedy or Newark. Additionally, a projected 12,600 new jobs, with average annual salaries estimated at \$50,000, are expected to be gained from the increased passenger movement through LaGuardia due to higher efficiencies gained from using larger aircraft at more slot times. These jobs are expected to generate \$1.2 billion in incremental personal income and stimulate \$3.4 billion in additional GDP annually. Furthermore, LaGuardia will finally become a true competitor to John F. Kennedy and Newark, both of which have grown substantially over the past 20 years and become global hubs. The benefits of lifting the Perimeter Rule will be felt far beyond New York City, too. Upstate New York markets will realize substantial benefits with a projected 40% increase in connections to the West Coast, creating additional routing options through LaGuardia.

Thank you for your efforts to address this important issue that is impacting the quality of life in New York for so many workers, residents, and visitors. Please don't hesitate to reach out with any questions.

Sincerely,



Jennifer Hensley  
Executive Director

CC: Pat Foye, Port Authority of New York & New Jersey



JOSEPH D. MORELLE  
Majority Leader

THE ASSEMBLY  
STATE OF NEW YORK  
ALBANY

August 3, 2015

Mr. John Degnan  
Chairman  
Port Authority of New York and New Jersey  
4 World Trade Center, 150 Greenwich Street  
New York, New York 10006

Mr. Patrick Foye  
Executive Director  
Port Authority of New York and New Jersey  
4 World Trade Center, 150 Greenwich Street  
New York, New York 10006

Dear Chairman Degnan and Director Foye:

We wish to express our strong opposition to the possible lifting of the 1,500 mile perimeter rule at New York's LaGuardia International Airport by the Port Authority of New York and New Jersey.

At present, the perimeter rule assures the safe operation of airline services in the congested airspace in the New York/New Jersey region, while providing a critical mechanism for serving regional markets in the Northeast, including Upstate New York. Chapter VIII, Part U, Section 16 of the Airport Rules and Regulations currently provides that:

*"LaGuardia Airport is to be utilized for nonstop domestic flights and international flights pre-cleared by the Federal Inspection Services only to and from points that are located within 1,500 statute miles of LaGuardia Airport, and to and from Denver, CO. The foregoing limitation does not apply to flight operations conducted on Saturdays or to general aviation operations conducted at the Marine Air Terminal."*

Should the perimeter rule be lifted, there is the strong likelihood that airlines will transition their limited slots at LaGuardia away from Upstate cities towards more lucrative long haul flights originating on the West Coast or abroad. This action would result in Upstate airports experiencing a reduction in flights and increased fares as a result of airlines abandoning regional airports for more profitable destinations.

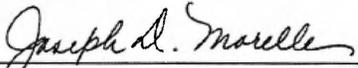
Further, the number of flights permitted to land and take-off from LaGuardia Airport is regulated by the Federal Aviation Administration. In the congested New York airspace it is highly unlikely that permission will be granted for additional flights at LaGuardia.

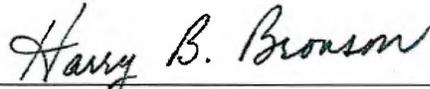
Chairman Degnan and Director Foye  
August 3, 2015  
Page 2

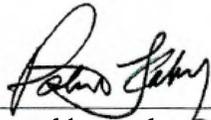
In the 21st century economy, Upstate New York depends on the ability to move goods and employees in a reliable and affordable way. According to a New York State Department of Transportation study, Upstate airports directly and indirectly account for 48,000 jobs, over \$4 billion in annual economic activity and pay over \$2.5 billion in state and local taxes. A reduction of flights across Upstate New York will dramatically impair our ability to compete for jobs in an increasingly global economy.

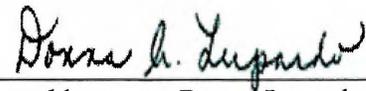
We strongly oppose the lifting of LaGuardia's perimeter rule and encourage the Port Authority's Board of Commissioners to consider these impacts and do the same. Thank you in advance for your consideration.

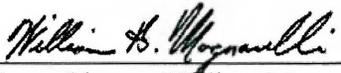
Sincerely,

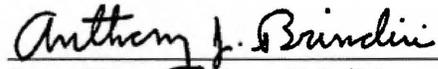
  
Majority Leader Joseph D. Morelle ✓

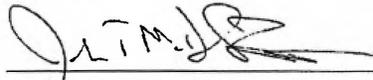
  
Assemblyman Harry Bronson ✓

  
Assemblymember Patricia Fahey ✓

  
Assemblywoman Donna Lupardo ✓

  
Assemblyman William Magnarelli ✓

  
Assemblyman Anthony Brindisi ✓

  
Assemblyman John McDonald ✓

  
Assemblywoman Barbara Lifton ✓

*Bill Magee*

Assemblyman Bill Magee ✓

*Phillip A. Steck*

Assemblyman Phil Steck ✓

*Sean M Ryan*

Assemblyman Sean Ryan ✓

*Didi Barrett*

Assemblymember Didi Barrett ✓

*Addie J. Russell*

Assemblywoman Addie Russell ✓

*Crystal Peoples-Stokes*

Assemblywoman Crystal Peoples-Stokes ✓

*Albert A. Stirpe*

Assemblyman Al Stirpe ✓

*Carrie W. Woerner*

Assemblymember Carrie Woerner ✓

*Angelo Santabarbra*

Assemblyman Angelo Santabarbra ✓

Cc: Scott Rechler

Richard Bagger

Steven Cohen

Michael Fascitelli

Hamilton James

George Laufenberg

Kenneth Lipper

Jeffrey Lynford

Raymond Pocino

William Schuber

David S. Steiner



31-00 47<sup>th</sup> Ave., #1105  
Long Island City, NY 11101

347 841 6090  
www.c4q.nyc  
@C4QNYC

June 2, 2015

Chairman John J. Degnan  
Port Authority of New York and New Jersey  
4 World Trade Center, 150 Greenwich Street  
New York, New York 10006

Dear Chairman Degnan,

As Executive Director of The Coalition for Queens, I recognize and appreciate the vital role airports play in generating economic activity in the region. This is most evident in Queens where we are fortunate enough to host two of the busiest travel hubs in the country - LaGuardia and JFK.

Both serve as key economic engines in our borough, sustaining thousands of jobs and generating millions in economic activity.

However, LaGuardia is currently falling short of its true potential by being held to an antiquated perimeter rule restricting the airport to service flights to locations in the Western U.S.

This rule impedes businesses including the burgeoning tech community that is rapidly growing and expanding in Queens and many view as the critical component to Queens' future economic health.

I am writing to let you know of the Coalition For Queens' support to lift the perimeter rule that will allow departing flights leaving LaGuardia the ability to exceed a 1,500 mile trip. A change to this rule will bring the opportunity for an increased \$1.2 billion in incremental personal income to the region.<sup>†</sup>

Lifting this rule is crucial to not only Queens, but also to the competitiveness of the entire state. I would urge the Port to act promptly.



31-00 47<sup>th</sup> Ave., #1105  
Long Island City, NY 11101

347 841 6090  
[www.c4q.nyc](http://www.c4q.nyc)

Thank you for your attention in this matter.

Sincerely,

Jukay Hsu  
Executive Director for Coalition for Queens



Edward H. Bastian  
President

March 23, 2015

Mr. John J. Degnan  
Chairman  
Port Authority of New York and New Jersey  
4 World Trade Center, 150 Greenwich Street  
New York, New York 10006

Dear Chairman Degnan,

On behalf of Delta Air Lines, I am writing in support of the recent initiative taken by the Port Authority of New York & New Jersey ("Port Authority") to review the perimeter rule at New York-LaGuardia ("LGA").

Delta has long been an enthusiastic supporter of the Port Authority's efforts to create an airport system for the 21<sup>st</sup> century, and the removal of the perimeter rule is in lockstep with these efforts to update and transform New York's airports.

The removal of the rule is not a new idea: There have been multiple calls for its elimination since its implementation in 1984. The rule's original objective—essentially, to build and strengthen JFK Airport—has more than been met over the past 30 years. JFK is now an established international gateway to the world, with more than 70 carriers serving local and connecting passengers. Multiple airlines have invested billions of dollars into infrastructure at the airport, solidifying their commitments to JFK as a strategic hub in New York.

This would not have been possible without the partnership between the airline industry and the Port Authority. Now is the time to take similarly bold and progressive steps at LaGuardia on behalf of the millions of people in the region who would benefit from the lifting of the perimeter rule.

Under the constraints of the perimeter rule, just 7 percent of flights at LGA utilize aircraft with 150 or more seats. That comes at a cost to passengers who want more choices and convenience. Airlines, meanwhile, can't match capacity with the demand, and the Port Authority can't maximize its limited slot portfolio.

Eliminating the perimeter rule will give customers the ability to choose how and where they fly and allow carriers to match capacity with that demand.

This is especially important for business travel, a segment that is critical to the region's economy. Today, more than one-third of the region's total annual corporate account spending on domestic travel is for destinations beyond the 1,500-mile perimeter. For some of the region's most important industries, that percentage of spending is even higher: 55 percent for media and entertainment, 38 percent for banking and finance and 35 percent for technology and communications.

Lifting the perimeter rule also would serve the economy of the entire state of New York. Residents in places such as Syracuse stand to gain 40 percent more connectivity to the West Coast. This will deliver incremental growth and drive investment in the region by providing access to those places where the region's economic ties are strongest.

Delta's investments in its LGA terminals, along with the slot swap, have demonstrated significant value to consumers, the region and the Port without hurting JFK. The elimination of the perimeter rule will further help these efforts by allowing customer demand to settle where it should at the region's three airports.

There are precedents in other markets. The recent repeal of the Wright Amendment and the partial lifting of restrictions of long-haul flying at Washington, D.C.'s Reagan National Airport ("DCA") are clear examples of adjusting regulations to meet consumer demand. In these cases, no airline flooded the market with capacity and no small city lost service.

Perimeter restrictions at DCA were lifted in select markets from 2000 to 2012. An analysis conducted by the GAO in 2007, reported that markets beyond the perimeter that gained DCA flights increased 4.4 percent above the average regional growth trend. This growth was additive to the market – it did not come at the expense of BWI or Dulles airports. The GAO report "did not find evidence that Dulles and BWI traffic or fares were affected by the beyond perimeter flights to DCA." Furthermore, it concluded, "Statutory restrictions such as the perimeter rule contribute to the underutilization of slots and prevent market forces from producing the maximum public benefit from the scarce assets."

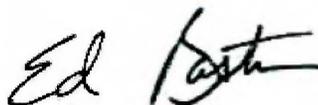
While the lifting of the Wright Amendment is in its early stages, multiple analyses predict similar benefits for both the use of assets as well as significant customer benefits. These include: 2,000-6,000 new jobs by 2020 and 3.7 million new one-way passengers. These analyses also predict fares will fall because of new competition.

Delta has made it clear that no small city will lose service to NYC if the perimeter rule is lifted. To be clear, removal of the perimeter rule at LGA would simply allow the airlines to take the same number of daily slots at each airport and allocate those slots to the airport that best serve true demand. And most importantly, passengers would have the freedom to decide their preferred airport.

Ultimately, passengers are the true beneficiaries of any efforts to modernize the region's airports. We want to provide customers with an experience that best represents New York. Over the past 30 years, we've witnessed advancements in technology and a natural evolution in travel. Industries around us have grown and changed. As a result, we support the Port Authority's efforts to re-evaluate the perimeter rule at LGA. We believe eliminating it will deliver substantial economic benefits to the NY and NJ region, allow the more efficient use of limited slots, and better match routes with current passenger demand.

We look forward to the Port Authority's decision on this matter in the coming weeks.

Sincerely,



Ed Bastian  
President  
Delta Air Lines

CC: Patrick Foye, Executive Director, PANYNJ ✓



March 12, 2015

The Honorable John J. Degnan  
Chairman  
The Port Authority of New York & New Jersey  
225 Park Avenue South  
New York, New York 10003

Mr. Patrick J. Foye  
Executive Director  
The Port Authority of New York & New Jersey  
225 Park Avenue South  
New York, New York 10003

Re: Alaska Airlines, Inc.—Potential Opening of the LGA Perimeter Rule

Dear Mr. Chairman & Executive Director:

Alaska would welcome the opportunity to meet with you and members of your staff to discuss Alaska's interest in the opportunity to provide nonstop service from LaGuardia Airport (LGA) to cities on the West Coast. That service would require a change in the longstanding LGA perimeter rule and Alaska is still evaluating all of the potential consequences of such a change. Alaska's overarching concern is that any change be enacted only if smaller carriers, including those such as Alaska which currently do not serve LGA, are afforded a fair and reasonable opportunity to provide beyond-perimeter service.

Alaska will commence JFK-Seattle service later this year after years of seeking commercially viable JFK slots. Alaska also operates twice daily Newark-Seattle service. Alaska plans to devote substantial resources to the successful development of its new JFK-Seattle service. Alaska has similarly developed a number of East-West transcontinental markets, including service to Seattle, Portland and Los Angeles from slot-restricted Reagan National Airport in the Nation's Capital. Alaska has also consistently been one of the most efficient users of slots at Reagan National measured, among others, in terms of seats per flight and load factor. Alaska has every intention of applying the same metrics to any new LGA service should the opportunity arise.

Alaska's many accomplishments are particularly noteworthy since Alaska is only the 6<sup>th</sup> largest US carrier with a domestic market share of 4 percent. Alaska is also the *only* carrier with pre-deregulation origins, dating back to 1932, never to have filed for bankruptcy or gone out of business. Alaska is one of only two US carriers to currently hold an investment grade rating.

Alaska hopes that the Port Authority shares Alaska's concern that smaller carriers, including new entrants, have a full and equal opportunity to participate in any opening of the LGA perimeter rule. The

three largest LGA slot holders presently control 88% of all US carrier departures at LaGuardia. These same carriers also comprise 72% of all departures from the three principal New York City airports. These carriers would be able to increase their dominance in the New York area and the overall domestic market unless an opening of the LGA perimeter rule was conditioned on smaller carriers, including new entrants, having no less than an equal opportunity to provide the same level of service.

Alaska appreciates that any change to the LGA perimeter rule presents a host of challenges for the Port Authority. Alaska looks forward to the opportunity to discuss this issue with you and members of your staff.

Sincerely,

A handwritten signature in black ink, appearing to read "Andrew Harrison", followed by a long horizontal line extending to the right.

Andrew Harrison  
EVP & Chief Revenue Officer

cc: Mr. Thomas L. Bosco  
Aviation Director



ALBANY COUNTY AIRPORT AUTHORITY  
ALBANY INTERNATIONAL AIRPORT  
ADMINISTRATION BUILDING  
SUITE 200  
ALBANY, NEW YORK 12211-1057

TEL: 518-242-2222  
ADMIN FAX: 518-242-2641  
FINANCE FAX: 518-242-2640  
SITE: [www.flyalbany.com](http://www.flyalbany.com)

August 3, 2015

Honorable Andrew Cuomo  
Governor, New York State  
State Capitol  
Albany, New York 12224

Dear Governor Cuomo:

As the Port Authority of New York and New Jersey considers lifting the 1,500 mile perimeter rule at New York's LaGuardia International Airport, we ask you to consider the potential impact on upstate New York air service and the upstate economy.

According to our air service consultants, the Albany International Airport would not experience significant changes to our flights based upon the rule change. Other upstate airports including Syracuse, Rochester and Buffalo would, in all likelihood, undergo a reduction in service to LaGuardia Airport. The airlines would replace the short haul upstate New York service with more profitable long haul service utilizing larger aircraft. These changes would come quickly as smaller regional jets providing service to upstate airports are replaced with full sized jets headed for the west coast. It is not inconceivable that some upstate cities would lose all service to NYC. In recent years, Albany International Airport lost all LaGuardia service due to slot reassignment. The airlines traded low yielding flights for high yielding flights.

The potential reduction in air service will change the way upstate cities are viewed by businesses. All business sectors from nanotechnology to finance located in upstate cities look for flights to NYC to conduct business or to make connection to international destinations. Albany is a little over two hours from NYC by train or auto, but the other upstate cities are much further away and losing air service would severely impact these cities ability to attract new businesses and retain their current businesses.

Honorable Andrew Cuomo

August 3, 2015

Page -2-

We strongly encourage you to continue to be the great advocate for the upstate economy as the lifting of the perimeter rule is considered. If we can be of any further assistance, please do not hesitate to contact us. Thank you in advance for your consideration.

Sincerely,



John A. O'Donnell

Chief Executive Officer

JAO:lmc

cc: Hon. Neil D. Breslin, 44<sup>th</sup> Senate District  
Hon. Phillip G. Steck, NYS Assembly District 110  
Hon. John T. McDonald, III, NYS Assembly District 108  
Hon. Patricia Fahy, NYS Assembly District 109  
Peter F. Stuto, General Counsel, ACAA  
Bill O'Reilly, CFO, ACAA



EDWARD C. BRAUNSTEIN  
Assemblyman 26<sup>th</sup> District  
Queens County

THE ASSEMBLY  
STATE OF NEW YORK  
ALBANY

CHAIRMAN  
Subcommittee on Trust and Estates  
COMMITTEES  
Aging  
Cities  
Health  
Insurance  
Judiciary  
Small Business

August 12, 2015

Hon. Andrew M. Cuomo, Governor  
New York State Capitol Building  
Albany, NY 12224

Dear Governor Cuomo:

It has recently come to our attention that the Port Authority of New York and New Jersey is considering lifting the perimeter rule at LaGuardia Airport. We are writing to express our opposition to such a change, as it would have a detrimental impact on communities in New York City and Nassau County that are already suffering from increased air traffic over the last few years.

Allowing for flights longer than 1500 miles will result in heavier planes departing from LaGuardia Airport because of the extra fuel reserves needed for those flights. Our research indicates that heavier planes take longer to reach higher altitudes, and therefore are closer to the ground for a longer time during departure. This may result in an increase in airplane noise for the neighborhoods under these flight paths.

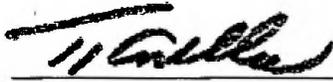
Additionally, the Port Authority has begun the process of conducting a Part 150 study that will determine the impact of the new RNAV procedures the FAA began to implement in 2012. We should, at the very least, wait to see the results of the Part 150 study before we begin adding heavier and louder planes.

The residents of Queens and Nassau deserve the quiet enjoyment of their homes. Already the recently instituted RNAV procedures are having a significant detrimental impact on many communities. Lifting the perimeter rule would compound this problem and would further diminish the quality of life for many New Yorkers.

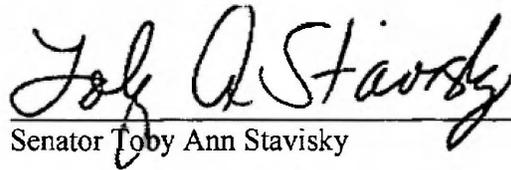
Thank you for your time and attention to this matter. We look forward to your response.

Sincerely,

Assemblyman Edward C. Braunstein



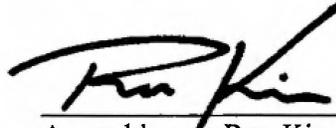
Senator Tony Avella



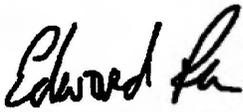
Senator Toby Ann Stavisky



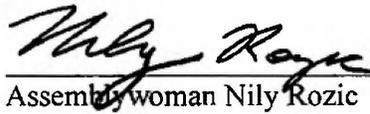
Assemblyman Michael DenDekker



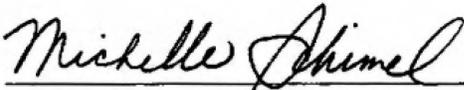
Assemblyman Ron Kim



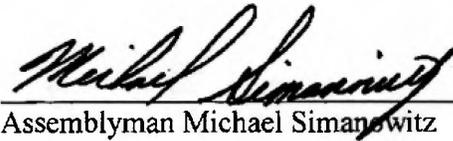
Assemblyman Edward Ra



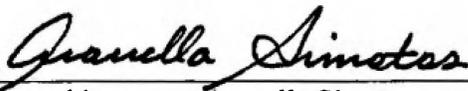
Assemblywoman Nily Rozic



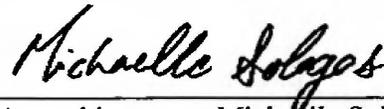
Assemblywoman Michelle Schimel



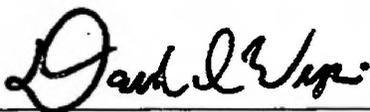
Assemblyman Michael Simanowitz



Assemblywoman Aravella Simotas



Assemblywoman Michaelle Solages



Assemblyman David Weprin



THE ASSEMBLY  
STATE OF NEW YORK  
ALBANY

JOSEPH D. MORELLE  
Majority Leader

August 3, 2015

The Honorable Andrew Cuomo  
Governor, New York State  
State Capitol  
Albany, NY 12224

Dear Governor Cuomo:

We wish to express our strong opposition to the possible lifting of the 1,500 mile perimeter rule at New York's LaGuardia International Airport by the Port Authority of New York and New Jersey.

Thanks to your leadership, Upstate New York is experiencing an economic resurgence. Lifting the perimeter rule runs counter to the progress we have enjoyed and future growth opportunities. We urge you to use your influence to stop this proposed policy change.

Currently, the Port Authority is studying the perimeter rule, which limits the distance traveled by flights out of LaGuardia to no more than 1,500 miles, to determine if it remains in the best interest of the state's air travelers. At present, the perimeter rule assures the safe operation of airline services in the congested airspace in the New York/New Jersey region, while providing a critical mechanism for serving regional markets in the Northeast, including Upstate New York.

Should the perimeter rule be lifted, there is the strong likelihood that airlines will transition their limited slots at LaGuardia away from Upstate cities towards more lucrative long haul flights originating on the West Coast or abroad. This action would result in Upstate airports experiencing a reduction in flights and increased fares as a result of airlines abandoning regional airports for more profitable destinations.

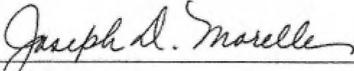
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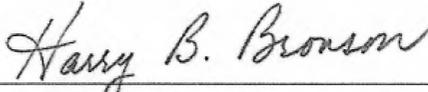
In the 21st century economy, Upstate New York depends on the ability to move goods and employees in a reliable and affordable way. According to a New York State Department of Transportation study, Upstate airports directly and indirectly account for 48,000 jobs, over \$4 billion in annual economic activity and pay over \$2.5 billion in state and local taxes. A reduction of flights across Upstate New York will dramatically impair our ability to compete for jobs in an increasingly global economy.

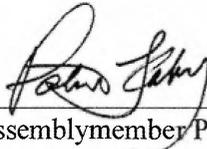
Governor Cuomo  
August 3, 2015  
Page 2

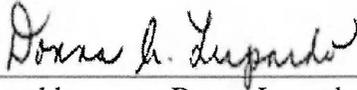
We remain grateful for your continued focus on Upstate New York and ask that you consider the harmful impact the lifting of the perimeter rule would have on our local economies. We would embrace the opportunity to partner with you in protecting Upstate's best interest. Thank you in advance for your consideration.

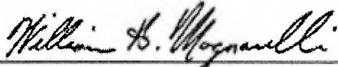
Sincerely,

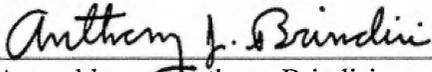
  
Majority Leader Joseph D. Morelle

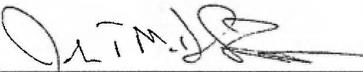
  
Assemblyman Harry Bronson

  
Assemblymember Patricia Fahey

  
Assemblywoman Donna Lupardo

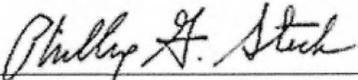
  
Assemblyman William Magnarelli

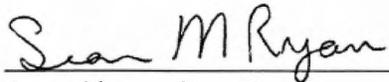
  
Assemblyman Anthony Brindisi

  
Assemblyman John McDonald

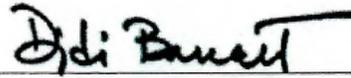
  
Assemblywoman Barbara Lipton

  
Assemblyman Bill Magee

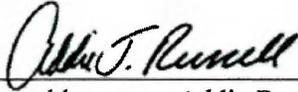
  
Assemblyman Phil Steck



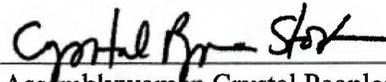
Assemblyman Sean Ryan



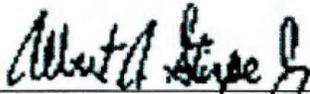
Assemblymember Didi Barrett



Assemblywoman Addie Russell



Assemblywoman Crystal Peoples-Stokes



Assemblyman Al Stirpe



Assemblymember Carrie Woerner



Assemblyman Angelo Santabarbara