

09/15/2025

To: David M. Cohen
Compliance Program Manager
Federal Aviation Administration
Eastern Region, Airports Division
1 Aviation Plaza, Room 516
Jamaica, NY 11434
David.m.cohen@faa.gov

April Gasparri
Director of Aviation
County of Westchester
240 airport Road, Suite 202
White Plains, NY 10604
axgc@westchestercountyny.gov

From: Eric Detmer, Walter J. Laird, Daniele Scarpazza, Charles Steele

Re: Monthly Tie Down Rate Increase at Million Air, Westchester County Airport, KHPN

Dear Mr. Cohen and Ms. Gasparri,

In consideration of your time, four private pilots/aircraft owners and Million Air tie-down tenants are represented in this letter. Over 60 combined years as tenants at the FBO currently leased by Million Air. We have in common a feeling the proposed tie-down rate increase at Million Air is unjust.

None of us are lawyers, but have all read FAA publications regarding grant assurances. We know HPN has received FAA grants for various airport improvements and therefore the airport operator, and by extension FBO's, are bound by the conditions of FAA grant assurances.

The current proposal by Million Air is to increase the outdoor tiedown monthly rate from \$365 to \$800 starting January 1st, 2026. This is an increase to 220% of the existing cost. Million Air is not proposing increasing other FBO user fees by such a high amount. Other user fees include hanger rent, valet parking, fuel, oil, transient aircraft parking, oxygen replenishing, lavatory servicing and office rent within the FBO. The price increase to 220% of current is only for outdoor tiedown tenants.

Operating costs of the FBO have not increased to 220% of existing. Speaking with a number of Million Air employees, none have indicated a more than two-fold increase in their salary. Each employee has confirmed raises of percentages in single digits. We are not privy to the lease terms of Million Air with HPN, but are comfortable assuming HPN did not increase the rent to 220% of existing. The proposed rent increase is not in response to increased operating expenses. The proposed rent increase is clearly targeting only outdoor tiedown customers.

Have the outdoor tiedown customers increased their burden on Million Air by over double? No. As has always been the case, outdoor tiedown customers walk out of the terminal to their tiedown spot, startup and taxi to the airport movement area without any assistance from Million Air. Upon return, taxi to the tiedown spot, push the plane into the tiedown spot, secure the plane and walk into the FBO, again without any assistance by Million Air resources. When Million Air resources allow, someone may get a ride on a golf cart to or from the terminal, but this is an exception, not a rule.

Over the past few years, we have seen ramp space that was once outdoor tiedown space reassigned to transient jet parking. Yes, Million Air collects more revenue from the ramp space

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when charging parking for transient jets compared to outdoor tiedown space. And in a free-market situation that would be reasonable. But this is not a free market situation. HPN and by extension Million Air, received grants from the FAA which require, in this particular case, eschewing free market decisions and instead respecting the requirement of the grant assurances of not discriminating against outdoor tiedown space for transient jet aircraft. Million Air is, in violation of the grant assurance terms, discriminating against the outdoor tiedown customer in favor of the higher paying transient jet customer.

Additionally, according to language in the grant assurance, the fees imposed must be fair and reasonable. Considering all these factors, it is impossible to justify the fee increase only for outdoor tiedown customers as fair or reasonable. We recognize price increases as consumers in general, as business owners, and of aviation related products. While we have seen price increases across all facets of our personal and professional lives, especially over the past few years, it is impossible to believe the proposed rent increase is related to market forces. Million Air's decision to increase the rent is clearly an attempt to drive out a particular segment of their customer base in favor of another higher paying client base.

Regarding the AOPA article published September 9, 2025. It was noted Million Air took over a lease 10 years ago and decided to freeze rates for piston tiedown tenants. That statement is not accurate. Our records show the 2014 through 2019 outdoor tie down rate was \$280 per month. We have no written data before 2014. The rate increased unremarkably from \$280 in 2019 to \$365 in 2025. That is not a rate freeze, that is an increase of 30% over 7 years, or using generous round numbers 4%-5% per year. That is an annual rate increase that anyone would consider fair and reasonable. Now the proposal is to increase the rent in a year by more than double? After over a decade of annual 4%-5% rent increases?

By any measure the proposed rent increase is not fair or reasonable, in conflict with the grant assurance. The rent increase is not associated with an increased operating cost, in conflict with the grant assurance. No quantitative difference has been shown between aeronautical users to justify a rate increase for one type of user, in conflict with the grant assurance. The increase is not associated with historical increases, in conflict with the grant assurance. The increase is not associated with a consistent methodology of establishing rates, in conflict with the grant assurance. This is clearly targeting the outdoor tiedown customer, in other words discriminatory, in conflict with the FAA grant assurances and should not be permitted.

See below for a check registry entry for the 2014 tiedown rate, and an invoice from 2019 for tiedown.

Respectfully submitted,

Eric, Walter, Daniele and Charlie

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Million Air White Plains

136 Tower Road Hangar M
White Plains, NY 10604
914-946-0100
914-946-8710 Fax

Sold To: CHARLIE STEELE PRESIDEN
R M P CORPORATION
14 Turtle Back Road
New Canaan, CT 06840

Invoice: 19-014245

7/01/2019
12.00PM

Line#	Type	Item/Description	Cr?	Aircraft	Quantity	Units	Unit Price	Extended	
1	Svc	Tie Down Revenue		N8694N	1.0	Each	280.00	280.00	
2	Note	Payment for these charges is due upon receipt.							
								Subtotal	280.00
								Total Due	280.00

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1030		BALANCE BROUGHT FORWARD	
DATE	April 9, 2014		
PAY TO	Million Air		
	14-124356 \$280-	DEPOSITS	
FOR	14-124637 \$20.00		
	14-124625 \$20.00	TOTAL	
	14-124641 \$13.47	THIS CHECK	443.47
		OTHER TRANS +/-	
TAX DEDUCTIBLE <input type="checkbox"/>		BALANCE	

1031		BALANCE BROUGHT FORWARD	
DATE	MAY 8, 2014		
PAY TO	Million Air		
	14-124358 Bd. Dve	DEPOSITS	
FOR	2nd Qtr Tie Down		
		TOTAL	
		THIS CHECK	560.00
		OTHER TRANS +/-	
TAX DEDUCTIBLE <input type="checkbox"/>		BALANCE	

April, May and June Tiedown, \$280/month

1033			
DATE	MAY 8		
PAY TO	William		
	AVIATION		
FOR	Balance		
TAX DEDUCTIBLE <input type="checkbox"/>			

1034			
DATE	JULI		
PAY TO	ABRO		
FOR	Inv. 86		
TAX DEDUCTIBLE <input type="checkbox"/>			