



REDEFINING WHAT'S POSSIBLE

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Federal Aviation Administration.
Office of Airports
901 Locust, Room 364
Kansas City, MO64106

Re: RCM Face To Face Visit

Dear Mr. Joel and Ms. Muder,

Please see questions UCM has regarding the Items the FAA identified as remaining in its December 8, 2026, letter. While this is not an exhaustive list it may help narrow down the topics UCM wishes to discuss at the to be scheduled in person meeting. UCM believes once the remaining Items are addressed and the Part 13 Informal complaint can be resolved, UCM can re-focus on airside and landside development of RCM to further benefit all public users.

As mentioned previously, UCM is working on revised Minimum Standards, as a separate document. Some of the revisions are contingent on discussion with the FAA.

I have listed UCM's questions based on the remaining Items identified by the FAA.

Item 1

- In the December 8th letter, section 1.G., third paragraph, the FAA states that RCM should take an inventory and classify each activity included in the inventory as commercial, non-commercial, or incidental. In 1.J.6 the FAA seems to suggest RCM eliminate the use of the term incidental. Can the FAA provide clarity as to whether any activity can be classified as incidental and what requirements must RCM place on those only conducting incidental activities?
 - Can the FAA provide more clarity on what is or is not "non-public, subordinate use"? Specifically, as it applies to commercial activity.
 - UCM is concerned these standards could lead to requiring CVAs for *all* commercial activity. Is that what the FAA is seeking?

- Can the FAA provide more guidance on its request for Item 1.G? UCM is concerned with the ability to monitor *all* activity if public users are not forthcoming with informing UCM on their activity.
 - It is difficult to inventory commercial activity if the operator is not taking up space. This is a reason why space was used as a defining factor. Does the FAA have a standard to which UCM may use as guidance for how to implement effective monitoring?
 - Can UCM act on information made known to it or that it has reason to be aware? (In regard to commercial activity that was not reported to UCM for purposes of an inventory.)
- It is still unclear to UCM why physical space cannot be used as a determining factor when regulations only apply to commercial operations who take up physical space at the airport. UCM believes this can be done consistently and reasonably, in line with the grant assurances. Can UCM include in its revised minimum standards that commercial activity that does not occupy space is a "tier 1 or category 1" activity and does not require CVAs?

Item 2

- Can the new standards be written to *not* require DPEs who do not occupy physical space to obtain a CVA?
 - Do the DPEs have to promote their services to the public for it to be public?
- 2.F.4 requires UCM to remove the use of FAA Order 8900.2 from the Minimum Standards Document. There is no language in the Minimum Standards Document referencing 8900.2. Can you please clarify?

Item 3

UCM would like to verify that UCM may establish additional fees or requirements for a commercial operation depending on the type of activity? For example, if the [REDACTED] operation is a tier 4, can the additional requirements include additional fees to account for more than the space being occupied? The agreement [REDACTED] entered into included considerations beyond the space being occupied that were applicable only to that operation.

Other Questions:

- UCM has identified all commercial operations at the airport. If the FAA is aware of others, please provide us with that information. UCM has repeatedly asked public users to disclose if they are operating a commercial aeronautical business or believes it is aware of other such operations. To UCM's knowledge, those businesses have been identified.

In addition to these questions, RCM is updating the FAA regarding DPE operations. CVA's for based PDE's, [REDACTED] have been fully executed, and they are conducting their commercial operations in accordance with UCM's minimum standards.

Upon receipt and internal review, please follow-up regarding availability dates and next steps.

Respectfully,

Robert W. Little

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