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COUNTY OF SANTA CLARA**

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February 24, 2022

SENT VIA EMAIL

Brian Q. Armstrong
Manager, Airport Safety and Standards Branch, Western-Pacific Region
Federal Aviation Administration
777 S. Aviation Blvd., Suite #150
El Segundo, CA 90245
Brian.Armstrong@faa.gov

Re: Request for Extension to Respond to FAA's Request for Additional Information

Mr. Armstrong,

The County of Santa Clara ("County") is in receipt of your Request for Additional Information dated February 22, 2022 requesting that the County supplement its January 11, 2022, and January 27, 2022 responses to the Notice of Informal Investigation Under 14 C.F.R. § 13.1. We appreciate the opportunity to provide the Federal Aviation Administration (FAA) with further information regarding the County's successful transition to the exclusive sale of unleaded fuel at the County Airports. We understand that ten days is an abnormally short time period for a response under the FAA's practices. It also does not allow the County sufficient time to provide the extensive information you have requested.¹ Moreover, just as the FAA has provided complainants with an opportunity to respond to the County, the County would like an opportunity to respond to complainants' rebuttals. We request an extension to April 4, 2022 to prepare our response and provide additional information.

¹ Your letter indicates that the FAA did not receive the property records related to land purchased or acquired by the County using funding from the United States. The requested records were provided as Exhibit A to the County's January 11, 2022 response. Please let us know if you did not receive Exhibit A or if there are specific additional records you require. Exhibit A is also available online at <https://tinyurl.com/yedcypm>.

Letter to Brian Q. Armstrong, Federal Aviation Administration
Re: Request for Extension to Respond to FAA's Request for Additional Information
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Your letter raises new issues and requests new information, some of which is not immediately available to the County. In particular, we were previously unaware of the complaint by Jose Muguerza referenced in your letter. The County requests a reasonable extension of time to investigate the circumstances surrounding Mr. Muguerza's complaint, search for the documents you have requested, and comprehensively respond to the issues you raised.

The County also requests time to respond to complainant rebuttals. We understand there are eighteen complainants in addition to Mr. Muguerza, and that the FAA has given each complainant 30 days, concluding on March 5, 2022, to provide rebuttals to the County's previous responses. These rebuttals may contain new information and raise new issues. We request copies of all complaints and rebuttals received by the FAA and sufficient time to prepare responses.

Furthermore, there are several upcoming meetings with the FAA, including your site visits the week of February 28, 2022 and a meeting with FAA officials which we expect to take place the week of March 7. An extension allows the County to address any issues raised in these upcoming meetings in its response.

An extension until April 4, 2022—30 days from the complainants' deadline to submit rebuttals—would most likely be sufficient for the County to address these matters, assuming no new issues that would require additional time. Please let me know if you would like to discuss this matter further. We look forward to your approval of the County's request.

Sincerely,

DocuSigned by:
James R. Williams
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JAMES R. WILLIAMS
County Counsel

c: County of Santa Clara Board of Supervisors
Dr. Jeffrey Smith, County Executive
Ro Khanna, Representative, California Congressional District 17
Anna Eshoo, Representative, California Congressional District 18
Zoe Lofgren, Representative, California Congressional District 19
Jimmy Panetta, Representative, California Congressional District 20
Annie Petsonk, Principal Deputy Assistant Secretary for Aviation and International Affairs, U.S. Department of Transportation
Brad Mims, Deputy Administrator, Federal Aviation Administration
John Putnam, Deputy General Counsel, U.S. Department of Transportation