



General Aviation Customs Facility Feasibility Assessment



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Study Purpose

The Brooksville-Tampa Bay Regional Airport (BKV) is home to over 150 aircraft and numerous businesses, some of which routinely conduct flights between the U.S. and international destinations. Upon their return to the U.S., aircraft must first be screened at an airport with a U.S. Customs and Border Protection (CBP) facility before ultimately flying to BKV. The additional airport stopover requires BKV tenants and visitors to spend additional money on fuel, maintenance, and crew costs. Consequently, if a CBP facility were provided at BKV, it may result in a significant cost savings for existing tenants and there may also be a potential to capture additional aircraft traffic and economic development opportunities both on the airport and within Hernando County. On December 19, 2012, Florida Governor Rick Scott sent a letter to U.S. Department of Homeland Security (DHS) Secretary Janet Napolitano that expressed his support for a CBP “user fee facility” at BKV. Governor Scott’s letter stated that “Hernando County Airport is currently home to two air ambulance companies which provide international service to their clients. Both companies have requested the availability of this service at the airport and have indicated that it would be a substantial benefit not only to their companies, but to the businesses they serve in the County. [...] In addition, the airport, with its continuing marketing program, is having success in generating interest from the international business aviation community. A number of companies that have shown an interest in opening a facility in Hernando County have expressed that having a Customs facility located at the airport would greatly enhance their desire to do business there.” CBP Deputy Commissioner David Aguilar sent a response to Governor Scott’s letter on January 31, 2013 which indicated that in order to provide a CBP “user fee facility” at BKV, the airport would have to ensure that such a facility met the appropriate standards for safety, security, and efficiency. Deputy Commissioner Aguilar also stated that the provision of such a facility would require a significant commitment of resources by both the airport and CBP, and for that reason, a firm commitment would be needed from the airport. Appendix A contains copies of the letters referenced above.

A CBP “user fee facility” is one where fees are collected by the airport sponsor to offset annual CBP staffing and miscellaneous costs. Although Governor Scott previously expressed his support for a CBP “user fee facility” at BKV, there are various financial implications associated with constructing and staffing such a facility that must be clearly understood. The purpose of this study is to evaluate those potential financial implications for BKV. The findings of this study should be utilized by the Hernando County Aviation Authority (Aviation Authority) to weigh the potential costs and benefits of implementing a CBP User Fee facility at BKV. The Aviation Authority has contracted with Michael Baker Jr., Inc. (Baker) to conduct this study which includes an analysis of the following elements:

- ➔ Introduction to CBP Facilities
- ➔ General Aviation (GA) User Fee Airport (UFA) Facilities in Florida
- ➔ Demand for a CBP Facility
- ➔ Requirements for a CBP Facility
- ➔ Alternatives for a CBP Facility
- ➔ Financial Analysis
- ➔ Hard-to-Quantify Benefits
- ➔ Summary

It is noted that much of the information in this study is speculative and/or is based off of preliminary survey information from airport tenants. The activity and financial projections should be viewed as sample analyses based on trends observed at airports with established CBP “user fee facilities” in Florida.

Introduction to CBP Facilities

Airport sponsors may consider two types of CBP facilities when applying for customs service – a “Port of Entry Airport” or a “User Fee Airport” (UFA). In order to establish a Port of Entry, the airport must meet one or more of the following three criteria: 1) the airport would handle 15,000 annual international passengers, 2) the airport would handle 2,000 annual scheduled international arrivals, and 3) the airport would process 2,500 consumption entries (each having a value of \$2,000 or more) with no more than half being attributed to any one party. Because BKV does not meet any of the Port of Entry thresholds, which would be typical of an airport with commercial passenger and/or cargo service, the airport would only be eligible for a UFA facility at this time. According to CBP’s Fact Sheet on User Fee Airports, “a UFA is a small airport which has been approved by the Commissioner of the CBP to receive, for a fee, the services of a CBP officer for the processing of aircraft, passengers and cargo entering the United States.” UFAs function similarly to Ports of Entry except the activity is generally less and the airport sponsor is responsible for all financial aspects of the CBP facility (staffing, facility costs, etc.). To be considered for a UFA facility, applicants must meet the following list of criteria that was summarized from the CBP’s Fact Sheet on User Fee Airports (*notes for BKV are provided in parentheses*):

- ➔ The volume or value of business at the airport is insufficient to justify the availability of inspectional services at such airport on a non-reimbursable basis. (*BKV is not eligible for reimbursable CBP services at this time.*)
- ➔ The current governor of the state in which such airport is located supports such designation in writing to the Commissioner of CBP. (*Governor Scott previously expressed his support in a letter to DHS Secretary Napolitano on December 19, 2012. If the Aviation Authority decides to continue to pursue a UFA facility, an updated letter from Governor Scott should be requested.*)
- ➔ The requestor (e.g. Aviation Authority) agrees to reimburse CBP for all costs associated with the services, including all expenses of staffing a minimum of one full-time inspector. (*To be determined.*)
- ➔ The requestor completes an Agriculture Compliance Agreement (ACA) with fixed base operators and garbage haulers for handling the international garbage. (*To be determined.*)

As previously mentioned, the purpose of this study is present the potential costs and benefits associated with implementing a UFA facility at BKV. If the Aviation Authority and Hernando County Board of County Commissioners (BOCC) decide to move forward with the implementation of a UFA facility, the following steps would need to be conducted as part of the application process:

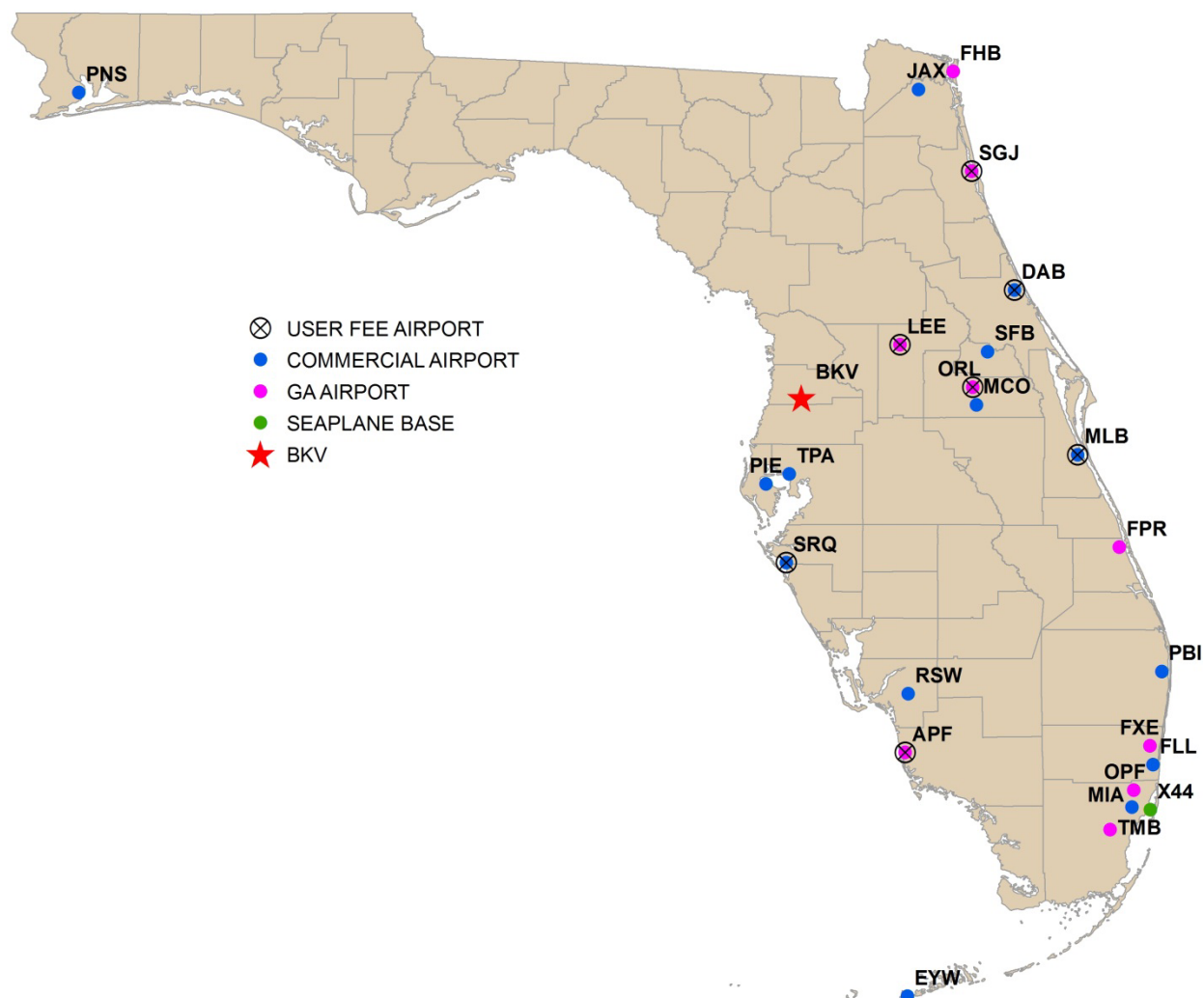
- ➔ Receipt of a letter from the current governor of the state supporting the user fee airport designation addressed to the Commissioner of CBP.
- ➔ An initial site visit in which CBP officials discuss workload and services.
- ➔ A final site visit in which CBP officials verify that facilities are 85% complete and adequate for inspectional services to be provided.
- ➔ A successful site visit in which CBP officials discuss workload and services and verify that facilities are adequate for inspectional services to be provided.
- ➔ Completing a Memorandum of Agreement (MOA) with CBP which states the responsibilities, fees, and hours of service.
- ➔ Completing an ACA with CBP for handling international garbage.

An approved UFA receiving CBP services is responsible for payment of the following fees:

- ➔ Per Inspector – \$140,874 for the first year and \$123,438 for succeeding years. It is noted that the number of inspectors is based on the maximum number of passengers that would be processed at a time. One inspector is acceptable for CBP facilities that process a maximum of 10 passengers at a time, but two or three inspectors are provided for CBP facilities that process up to 20 passengers.
- ➔ Automated Data Processing Costs Per Inspector – \$17,042 to \$21,062 for the first year and \$13,620 to \$17,640 for succeeding years, depending on the location.
- ➔ Other associated costs such as overtime.

The airport sponsor must provide CBP with a suitable facility at no charge to the federal government. The CBP facility may be located in a terminal building at a General Aviation (GA) airport or in a stand-alone structure. The requirements for CBP facilities are presented later in this study. According to the July 16, 2013 List of Airports where CBP Inspection Services Are Normally Available, there are a total of 24 airports in Florida with CBP facilities (refer to **Figure 1**). Nine of those facilities are located at GA airports, of which Naples Municipal Airport (APF) has the only GA UFA facility on the west coast of Florida. The following section presents an overview of the GA UFA facilities in Florida.

Figure 1
CBP Airport Facilities in Florida



Source: Michael Baker Jr., Inc., 2014.

GA UFA Facilities in Florida

The following four GA airports currently have UFA facilities in Florida:

- ➔ Leesburg International Airport (LEE)
- ➔ Orlando Executive Airport (ORL)
- ➔ Northeast Florida Regional Airport (SGJ)*
- ➔ Naples Municipal Airport (APF)

*Frontier Airlines will begin service at SGJ on May 2, 2014.

It was important to review various characteristics of the GA UFA facilities to determine what types of competitive fees could potentially be charged at BKV if a UFA is considered. It was also important to review the finances of those facilities to determine if a UFA facility at BKV

could ultimately be financially self-sustainable. **Table 1** summarizes the user fees that are currently charged at the four GA UFA facilities as well as some comparisons to the airfield at BKV and the local characteristics of Hernando County. As shown, the hours of operation and days of the week vary at the four UFA facilities. For example, the UFA facility at SGJ is open from 11:30 a.m. to 8:00 p.m. Thursday to Monday, which probably caters to weekend trips to the Bahamas. Other noteworthy comparisons between BKV and the four GA UFA facilities include runway length availability, approach types and minimums, and Metropolitan Service Area (MSA) population and employment. The information in Table 1 should be utilized by the Aviation Authority to discuss the potential advantages and disadvantages of implementing a UFA facility at BKV. The remainder of this section includes a brief summary of the four GA UFA facilities in Florida.

Leesburg International Airport (LEE)

According to the article, *Leesburg airport lands customs office*, the CBP facility at LEE opened in the summer of 2005 and the \$460,000 office was paid for by the owners of The Villages retirement community. Since that time, The Villages has provided the City of Leesburg with a \$120,000 per year subsidy that helps pay for the annual CBP costs. The Villages wanted a CBP facility at LEE so they could have a more convenient location to bring in potential international homebuyers and businesses.¹ Representatives of Baker and BKV visited the CBP facility at LEE on December 9, 2013, during which time the CBP officer confirmed that The Villages continues to provide the City of Leesburg with a \$120,000 per year subsidy. It is anticipated that the City of Leesburg is responsible for the remainder of the annual CBP fees as well as the facility costs (maintenance, utilities, etc.).

In Fiscal Year (FY) 2013 (October 1 through September 30), the CBP collected \$131,738.78 in fees from the City of Leesburg.² **Table 2** presents a sample analysis of international arrival activity at LEE in 2013 (January 1 through December 31). This information was derived by reviewing international flight plan data and should not be construed as actual CBP collections at LEE in 2013, but as an approximation of CBP collections and international arrival. Based on this analysis, it does not appear that a financially self-sustainable CBP facility could have been constructed and staffed at LEE if it were not for the initial and annual contributions by The Villages. As shown in **Table 3**, there were some months in 2013 where very few international arrivals/clearances occurred at LEE (e.g., two clearances in November and three clearances in September) and it appears that Mondays represented the busiest day for CBP activity. Those types of factors are important when considering the preferred hours of operation for a CBP facility.

The CBP facility at LEE is located within the same building as the airport's Fixed Base Operator (FBO), Sunair Aviation (refer to **Figure 2**).

¹ *Leesburg airport lands customs office*, Ocala Star-Banner, May 19, 2005.

² Customs and Border Protection Collection of Duties, Taxes, and Fees by Districts and Ports, FY 2013.

Table 1
Comparison of GA UFA Airports in Florida

Type of Aircraft	BKV	LEE	ORL	SGJ	APF
CBP User Fees					
SEP	N/A	\$50	\$0	\$50	\$50
MEP	N/A	\$75	\$0	\$50	\$100
SET or MET	N/A	\$100	\$0	\$150	\$150
Jets <20,000 lbs.	N/A	\$150	\$0	\$250	n/a
Jets >20,000 lbs.	N/A	\$250	\$0	\$250	n/a
Jets <42' Wing	N/A	n/a	\$0	\$250	\$200
Jets 42'-57' Wing	N/A	n/a	\$0	\$250	\$300
Jets >57' Wing	N/A	n/a	\$0	\$250	\$400
Overtime Fee (per hour)	N/A	\$150	Unknown	\$150	\$140
International Garbage Fee	N/A	Unknown	Unknown	Unknown	\$75
Towing Fee	N/A	Unknown	Unknown	Unknown	\$50
CBP Hours of Operation	N/A	8:00A-4:30P M-F	8:30A-5:00P M-F	11:30A-8:00P Th-M	10:30A-7:00P S-S
Airport & Local Area Characteristics					
NM from BKV	0.0 NM	40.0 NM NE	59.3 NM E	106.6 NM NE	143.9 NM SSE
City	Brooksville	Leesburg	Orlando	St. Augustine	Naples
Tower	Yes	Yes	Yes	Yes	Yes
Longest Runway	7,002'	6,300'	6,004'	8,002'	6,600'
Best Approach (Min.)	ILS (1/2 Mile)	LPV (1 Mile)	ILS (1/2 Mile)	ILS (3/4 Mile)	LPV (1 Mile)
Fixed-Wing Based Aircraft ¹	135	88	199	245	327
Based Jets ¹	14	1	17	17	44
2013 Operations ²	46,275	54,508	107,189	140,417	91,929
County	Hernando	Lake	Orange	St. Johns	Collier
2013 County Population ³	173,731	306,379	1,230,640	208,052	337,602
2013 County Employment ³	46,062	94,997	626,550	74,596	148,057
Metropolitan Statistical Area (MSA)	Tampa-St. Petersburg-Clearwater	Orlando-Kissimmee-Sanford	Orlando-Kissimmee-Sanford	Jacksonville	Naples-Marco Island
2013 MSA Population ³	2,866,728	2,268,430	2,268,430	1,392,712	337,602
2013 MSA Employment ³	1,265,400	1,008,178	1,008,178	612,577	148,057

Sources: The user fee source data for LEE, SGJ, and APF was obtained from the individual airport websites. The user fee source data for ORL was obtained by calling the Greater Orlando Aviation Authority.

¹FAA 5010-1 (Airport Master Record), effective February 6, 2014.

²FAA Air Traffic Activity Data System (ATADS).

³DemoGraphicsNow database, Alteryx, Inc., 2014.

Table 2
2013 LEE International Clearances by Aircraft Type (estimated from flight plan data)

Departure Country	SEP	MEP	TP	Jet (<20)	Jet (20+)	Total
Australia					1	1
Bahamas	5	48	9	5	44	111
Barbados					9	9
Canada				6	4	10
Cayman Islands				2		2
Columbia			1			1
Costa Rica	1			1	1	3
Dominican Republic			1		1	2
Panama					4	4
Turks and Caicos				3		3
Total Clearances	6	48	11	17	64	146
% of Total	4.11%	32.88%	7.53%	11.64%	43.84%	100.00%
Cost Per Clearance	\$50	\$75	\$100	\$150	\$250	
Potential Inspection Fees	\$300	\$3,600	\$1,100	\$2,550	\$16,000	\$23,550
After Hours Fee	\$140					
Weekday After Hours Clearances	27 (18.5% of clearances)			\$3,780		
Weekend Clearances	30 (20.5% of clearances)			\$4,200		
Potential Fees Collected (Inspection + OT)	\$31,530					

Sources: FAA flight plan activity data from flightwise.com and Michael Baker Jr., Inc., 2014.

Notes:

- 1) This table assumes that fees were collected for all international arrivals as listed on the airport's fee schedule. Actual collections may have been higher or lower than the totals provided.
- 2) This information is provided for generalized analysis purposes only.

Table 3
2013 LEE International Clearances by Month and Day of Week (estimated from flight plan data)

Month	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Unk	Total
Arrivals	9	7	20	19	16	12	13	25	3	7	2	9	4	146
%	6.2%	4.8%	13.7%	13.0%	11.0%	8.2%	8.9%	17.1%	2.1%	4.8%	1.4%	6.2%	2.7%	100.0%
Day	Sun	Mon	Tue	Wed	Thu	Fri	Sat	Unk	Total					
Arrivals	13	33	15	18	22	24	17	4	146					
%	8.9%	22.6%	10.3%	12.3%	15.1%	16.4%	11.6%	2.7%	100.0%					

Sources: FAA flight plan activity data from flightwise.com and Michael Baker Jr., Inc., 2014.

Notes:

- 1) This table assumes that fees were collected for all international arrivals as listed on the airport's fee schedule. Actual collections may have been higher or lower than the totals provided.
- 2) This information is provided for generalized analysis purposes only.

Figure 2
CBP Facility at LEE



Source: sunairaviation.com.

Naples Municipal Airport (APF)

The \$1.3 million CBP facility at APF was funded by the Naples Aviation Authority and was opened on December 20, 2013 after a condensed six month construction timeframe. According to the article, *Naples Airport going international: Officials closer to getting a customs check point*, the Naples Aviation Authority did not expect to make money off the CBP facility; rather, they considered it a public service to the community and airport tenants and also important for the local economy. Besides the initial construction costs, an additional \$306,000 was expected to cover the annual CBP staffing and miscellaneous costs. The CBP facility at APF is open from 10:30 a.m. to 7:00 p.m. seven days a week and is staffed by two inspectors.³ A summary of the actual CBP revenues and expenses at APF as well as the number of aircraft clearances from 2011 to 2013 is presented in **Table 4**. As shown in **Figure 3**, the customs facility at APF is located in its own building on the west side of the terminal apron just south of the Airport Traffic Control Tower (ATCT).

Table 4
Naples Municipal Airport CBP Revenues, Expenses, and Aircraft Clearances

Item	2011	2012	2013
FY CBP Revenues (User Fees)	\$103,000	\$163,000	Not Available
FY CBP Expenses	\$342,000	\$299,000	Not Available
FY CBP Net Income	(\$239,000)	(\$136,000)	Not Available
CY Aircraft Clearances	310	508	561

Sources: Naples Aviation Authority 2012 Comprehensive Annual Financial Report and December 2013 Operations Summary.

³ *Naples Airport going international: Officials closer to getting a customs check point*, naplesnews.com, April 1, 2010.

Figure 3
CBP Facility at APF

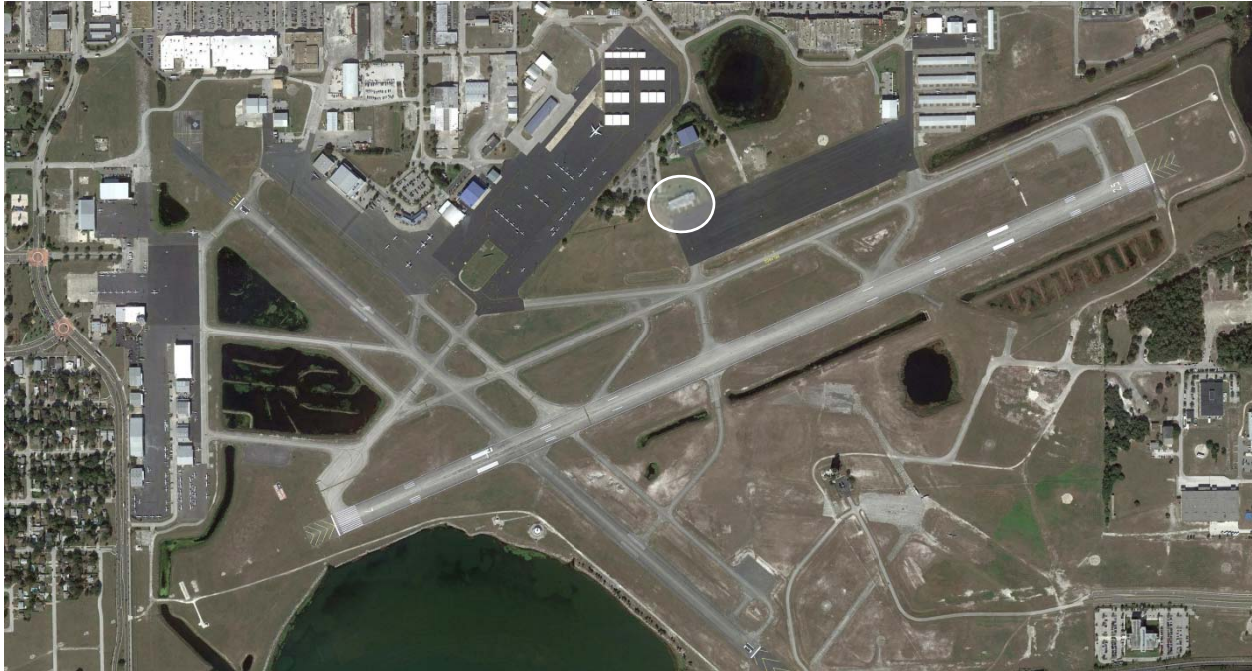


Source: naplesnews.com.

Orlando Executive Airport (ORL) and Northeast Florida Regional Airport (SGJ)

Besides the information previously presented in Table 1, limited additional data was available for ORL and SGJ. It is important to point out that ORL is owned by the Greater Orlando Aviation Authority (GOAA), which also owns Orlando International Airport (MCO). As such, there is a benefit for GOAA to provide CBP services at ORL in order to relieve GA traffic at MCO. SGJ is the only GA UFA on the east coast of Florida, but Frontier Airlines will begin scheduled service between SGJ and Trenton-Mercer Airport (TTN) in New Jersey on May 2, 2014. The customs facility at ORL is located in the airport administration building on the east ramp (refer to **Figure 4**). The customs facility at SGJ is located adjacent to the ATCT in the southeast corner of the airport (refer to **Figure 5**).

Figure 4
CBP Facility at ORL



Source: Google Earth.

Figure 5
CBP Facility at SGJ



Source: Google Earth.

Demand for a CBP Facility

As can be seen in the previous examples for LEE and APF, a significant amount of activity must occur in order for a UFA facility to be financially self-sustainable. In both examples, the UFA facilities were constructed with the understanding that they might not be profitable, but they were deemed valuable to local businesses and for economic development. The purpose of the demand analysis is to determine what the potential utilization of a UFA facility might be following construction at BKV (i.e., how many annual clearances would occur and by what types of aircraft). The CBP utilization data was primarily derived from questionnaires that were emailed to BKV's international aircraft operators, although some additional assumptions were employed to forecast growth in international arrival activity over a 10-year period. The CBP utilization data in this section is later used to evaluate the financial feasibility of implementing a UFA facility at BKV.

The questionnaire was emailed to BKV's international aircraft operators on July 29, 2013. Email responses were obtained from two companies, JET I.C.U. and Corporate Jet Solutions, Inc., and telephone conversations were conducted with American Aviation, Inc. on February 27, 2014 and Global Jetcare on March 17, 2014. JET I.C.U. is based at BKV and provides worldwide air ambulance services with their fleet of Learjets. Corporate Jet Solutions, Inc. is also based at BKV and provides on-demand maintenance services for disabled "Aircraft-on-Ground" (AOG) throughout the world. Although the company does not utilize their own aircraft to transport maintenance crew, they frequently fly in and out of BKV in corporate jets. As one of two fixed base operators on the airport, American Aviation provides aircraft maintenance and support services to corporate jets flying to BKV. Global Jetcare provides similar services as JET I.C.U. and currently has two jets based at BKV, but plans to bring a third jet back into service in the near future. All four companies indicated that the provision of a CBP facility at BKV would be beneficial to them because it would eliminate the need to conduct a stopover at another airport, which reduces aircraft turnarounds, fuel and maintenance needs, crew time, etc. The following questions were included in the questionnaire:

1. Approximately how many clearances would your company, tenants or users perform here (estimated annually)?
 - a. Has this trended up or down in recent years?
 - b. Do you anticipate increased usage due to on-site availability? If so, to what extent? Please be as specific as possible.
2. Schedules are usually 8:00-4:30. How much of your expected usage would be during those hours?
3. Understanding that overtime charges are significant and advance notice is required, what would you recommend a schedule to be (if choice available)?
4. Does your company hold an overflight exemption?
5. What would your company, tenants or users be willing to pay to clear customs here?

For this study, the most important questions were related to the number of expected clearances that each company would conduct at BKV and their willingness to pay for CBP services at BKV.

The other questions are important for determining the logistics for implementing a CBP facility at BKV (e.g., hours of operation) and may require a much larger survey and coordination effort before those variables can be established. **Table 5** summarizes the relevant information that was derived from the questionnaires. It is assumed that all of the activity by JET I.C.U., Corporate Jet Solutions, Inc., and Global Jetcare would be conducted using corporate jets.

Table 5		
Results of Airport User Questionnaire/Interviews		
Operator Name	Estimated Annual Clearances	Recommended Fees Per Clearance
JET I.C.U.	125-150	Varies Based on Aircraft
Corporate Jet Solutions, Inc.	50 (initially) 100 (potentially)	No Cost
American Aviation, Inc.	Unknown	Varies Based on Aircraft
Global Jetcare	100 (with 2 jets) 125 (with 3 jets)	Prefers Fee to Stopover
Maximum Anticipated Clearances	375	

Source: Airport user questionnaire.

It is noted that this information represents a very small cross section of existing and potential airport users, and as such, may represent a significant under exaggeration of what actual CBP activity would be following the construction of a UFA facility at BKV. In order to determine the potential for additional CBP clearances beyond what the questionnaires revealed, a further analysis of LEE's international arrival activity was conducted (*again, this represents a sample analysis and is not intended to reflect actual CBP activity at LEE*). Specifically, the number of clearances by aircraft type was compared to the number of annual operations by aircraft type to determine ratios (i.e., percent cleared aircraft by type to total annual operations by aircraft type). For example, according to Federal Aviation Administration (FAA) flight plan activity data, there were 403 turboprop operations at LEE in 2013 and 11 international arrivals by turboprops in 2013, which means that 2.73 percent of all turboprops operations cleared customs at LEE in 2013. The activity ratios for LEE are presented in **Table 6**. As shown in **Table 7**, those ratios were applied to BKV's 2013 operations to determine an estimated number of CBP clearances for Single-Engine Pistons (SEP), Multi-Engine Pistons (MEP), and Turboprops (TP) in the first year following construction of a UFA facility at BKV. The number of jet clearances was determined from the results of the airport user questionnaire and the split between jets weighing less than or greater than 20,000 pounds was obtained from the LEE activity data. Over the course of the 10-year period following construction of a UFA facility, a forecast annual growth rate of 1.24 percent was applied to all aircraft types, which is the same growth rate that the FAA utilize in the 2012 Terminal Area Forecast (TAF) for BKV (for itinerant air taxi and GA operations between 2013 and 2023). The CBP clearance forecasts are simply presented for analytical purposes so that the potential implications of implementing a UFA facility at BKV can be examined (e.g., financial implications), which are evaluated later in this study.

Table 6						
2013 LEE Ratio of Clearances to Operations (estimated from flight plan data)						
Variable	SEP	MEP	TP	Jet (<20)	Jet (20+)	Total
Total Clearances	6	48	11	17	64	146
Total Operations	38,229	14,139	403	1,737		54,508
Ratio (Clearances / Operations)	0.02%	0.34%	2.73%	0.98%	3.68%	0.27%

Sources: FAA flight plan activity data from flightwise.com and Michael Baker Jr., Inc., 2014.
Note: This information is provided for generalized analysis purposes only.

Table 7
Forecast CBP Clearance Activity at BKV

Variable	SEP	MEP	TP	Jet (<20)	Jet (20+)	Total
BKV 2013 Total Operations	36,755	8,068	467	375 (from Table 5)		
Lee Ratio (Clearances / Operations)	0.02%	0.34%	2.73%	21%	79%	0.27%
Baseline Year Clearances	7	27	13	79	296	422
Baseline Year +1	7	27	13	80	300	427
Baseline Year +2	7	28	13	81	304	432
Baseline Year +3	7	28	13	82	307	437
Baseline Year +4	7	28	13	83	311	443
Baseline Year +5	7	29	13	84	315	448
Baseline Year +6	8	29	13	85	319	453
Baseline Year +7	8	29	13	86	323	459
Baseline Year +8	8	30	13	87	327	464
Baseline Year +9	8	30	13	88	331	470
Baseline Year +10	8	31	13	89	335	476
AAGR	1.24%	1.24%	1.24%	1.24%	1.24%	1.24%

Sources: FAA flight plan activity data from flightwise.com and Michael Baker Jr., Inc., 2014.

Note: This information is provided for generalized analysis purposes only.

AAGR – Average Annual Growth Rate from the Baseline Year to the Baseline Year +10.

Requirements for a CBP Facility

In CBP Deputy Commissioner Aguilar’s letter to Governor Rick Scott, he stated that “The proposed facility must comply with the CBP Airport Technical Design Standards, which have been provided to the Aviation Authority. The design standards outline the requirements for a Federal Inspection Service area that has the appropriate dimensions needed to clear international arrivals.” This section includes an evaluation of both the building area requirements and aircraft parking/apron requirements associated with providing a CBP facility at BKV.



**U.S. Customs and
Border Protection**

CBP Building Requirements

As shown in **Figure 6**, the main elements of a GA CBP facility include space for passenger waiting and processing, an office, a computer/communications room, a storage room, a search/hold room, an interview room, an Agricultural Quarantine Inspection (AQI) area, and public toilets. The space requirements vary based on the number of passengers that would be processed in an hour. At BKV, it is anticipated that all CBP clearances would be conducted by GA aircraft no larger than a corporate jet, and as such, a minimum spacing requirement of 1,474 square feet plus additional space for a circulation, an AQI laboratory, and public restrooms that are compliant with the 2012 Florida Accessibility Code for Building Construction and the 2010 Florida Building Code. A sample GA CBP facility layout is presented in **Figure 7**. There are also several other building requirements that must be considered, as detailed in the CBP’s Airport Technical Standards for Passenger Processing Facilities, including the need for security features (wall and window types, cameras, etc.) and for the CBP officer to have an unobstructed view of the aircraft parking apron. The airport must provide the building to the CBP at no cost to the federal government.



SMALL			
GAF	200	400	600

GENERAL NOTES

"v" designation refers to varies per location

Verify all space and functional requirements with code requirements

Source: CBP Airport Technical Design Standards for Passenger Processing Facilities.

2160 SF PASSENGER WAITING

LOW WINDOWS

VISITOR SEATING

56 PUBLIC TOILET

56 PUBLIC TOILET

DF

SAFE

65 STORAGE

66 COMPUTER/COMM. ROOM

PASSENGER PROCESSING

VISITOR SEATING

S.S. RAILING

FORMS/ WRITING COUNTER

BAG EXAM TABLE

DETENTION BENCH

120 SEARCH/HOLDROOM

DETENTION TYPE TOILET/LAVATORY

80 INTERVIEW ROOM

WINDOW

110 AQI LABORATORY

COATS

COMPACT KIT UNIT

CBP GENERAL OFFICE

225

PUBLIC WINDOW

EXIT FOYER

MECHANICAL

LANDSIDE

HIGH WINDOWS

Source: CBP Airport Technical Design Standards for Passenger Processing Facilities.

CBP Aircraft Parking Requirements

The CBP aircraft parking apron is intended to be a restricted area in order to prohibit unauthorized entries or contact with persons or objects. The apron should be designed to accommodate the largest anticipated aircraft type that operates at the airport. **Table 8** includes a summary of the non-military jet activity that occurred at BKV in 2013 – this represents all jet activity at BKV and not necessarily aircraft that would conduct international arrivals if a UFA facility is ultimately provided. As shown, Airplane Design Group (ADG) I jets with wingspans less than 49 feet comprised the majority of jet operations in 2013 (73.82 percent) and only one arrival and departure occurred by an ADG III jet with a wingspan of 93 feet 4 inches (Gulfstream G500). The apron sizing and strength requirements increase as the wingspan, length, and weight of the design aircraft increases. As a matter of comparison, the width of the Taxilane Object Free Area (TOFA), or the area that should remain clear of objects to enhance the safety of aircraft operations, is 79 feet for ADG I, 115 feet for ADG II, and 162 feet for ADG III. These aircraft parking requirements and the jet activity data presented should be considered during the selection of a preferred CBP site at BKV. Furthermore, the ability to potentially expand the apron should also be considered as there may be a demand for different aircraft to utilize the CBP facility than initially intended.

Table 8
2013 Non-Military Jet Activity at BKV

Aircraft	Dep	Arr	Total	Average Seats	ADG
ADG I Jet Activity (wingspans <49')					
LJ35 - Bombardier Learjet 35/36	351	232	583	8	I
PRM1 - Raytheon Premier 1/390 Premier 1	53	53	106	6	I
LJ60 - Bombardier Learjet 60	49	39	88	8	I
EA50 - Eclipse 500	42	41	83	6	I
BE40 - Raytheon/Beech Beechjet 400/T-1	24	25	49	5	I
LJ25 - Bombardier Learjet 25	17	18	35	8	I
C525 - Cessna CitationJet/CJ1	12	11	23	5	I
LJ45 - Bombardier Learjet 45	6	6	12	10	I
E50P - Embraer Phenom 100	4	4	8	6	I
LJ40 - Learjet 40; Gates Learjet	4	4	8	10	I
C510 - Cessna Citation Mustang	3	4	7	6	I
LJ55 - Bombardier Learjet 55	4	3	7	8	I
LR35 - Learjet 35	1	4	5	8	I
C500 - Cessna 500/Citation I	2	2	4	6	I
FA10 - Dassault Falcon/Mystère 10	2	2	4	4	I
MU30 - Mitsubishi MU300/ Diamond I	3	1	4	4	I
C501 - Cessna I/SP	1	1	2	6	I
H25A - BAe HS 125-1/2/3/400/600	1	1	2	12	I
LJ31 - Bombardier Learjet 31/A/B	1	1	2	8	I
WW24 - IAI 1124 Westwind	1	1	2	10	I
LR60 - Bombardier Learjet 60	0	1	1	8	I
ADG I Jet Activity	581	454	1,035	73.82% of Jet Activity	
ADG II Jet Activity (wingspans 49' - <79')					
F900 - Dassault Falcon 900	46	40	86	15	II
CL60 - Bombardier Challenger 600/601/604	26	26	52	15	II
H25B - BAe HS 125/700-800/Hawker 800	21	26	47	12	II
C560 - Cessna Citation V/Ultra/Encore	19	20	39	8	II
C56X - Cessna Excel/XLS	14	14	28	15	II
C550 - Cessna Citation II/Bravo	11	10	21	10	II

Table 8
2013 Non-Military Jet Activity at BKV

Aircraft	Dep	Arr	Total	Average Seats	ADG
C750 - Cessna Citation X	8	8	16	14	II
C680 - Cessna Citation Sovereign	7	7	14	12	II
C25C - Cessna Citation CJ3	6	6	12	5	II
CL30 - Bombardier (Canadair) Challenger 300	6	6	12	8	II
C25B - Cessna Citation CJ3	5	5	10	5	II
FA50 - Dassault Falcon/Mystère 50	2	3	5	12	II
GLF4 - Gulfstream IV/G400	2	3	5	14	II
ASTR - IAI Astra 1125	2	2	4	6	II
F2TH - Dassault Falcon 2000	2	2	4	12	II
C650 - Cessna III/VI/VII	1	1	2	6	II
E55P - Embraer Phenom 300	1	1	2	8	II
FA20 - Dassault Falcon/Mystère 20	1	1	2	10	II
GALX - IAI 1126 Galaxy/Gulfstream G200	1	1	2	8	II
GLF3 - Gulfstream III/G300	1	1	2	15	II
ADG II Jet Activity	182	183	365	26.04% of Jet Activity	
ADG III Jet Activity (wingspans 79' - <118')					
GLF5 - Gulfstream V/G500	1	1	2	15	III
ADG III Jet Activity	1	1	2	0.14% of Jet Activity	
Total Jet Activity					
Total Jet Activity	764	638	1,402		
Sources: FAA flight plan activity data from flightwise.com and Michael Baker Jr., Inc., 2014.					

Alternatives for a CBP Facility

The purpose of the alternatives analysis is to evaluate potential sites on the airport property for their viability of accommodating a CBP facility. As shown in **Figure 8**, two sites were evaluated based on the previously-identified requirements and were visited by architectural staff from Baker to determine what types of improvements would be necessary in order for each site to provide the elements required by CBP. An unidentified third site was also considered that would involve entirely new construction of a CBP building and apron.

Brooksville-Tampa Bay Regional Airport

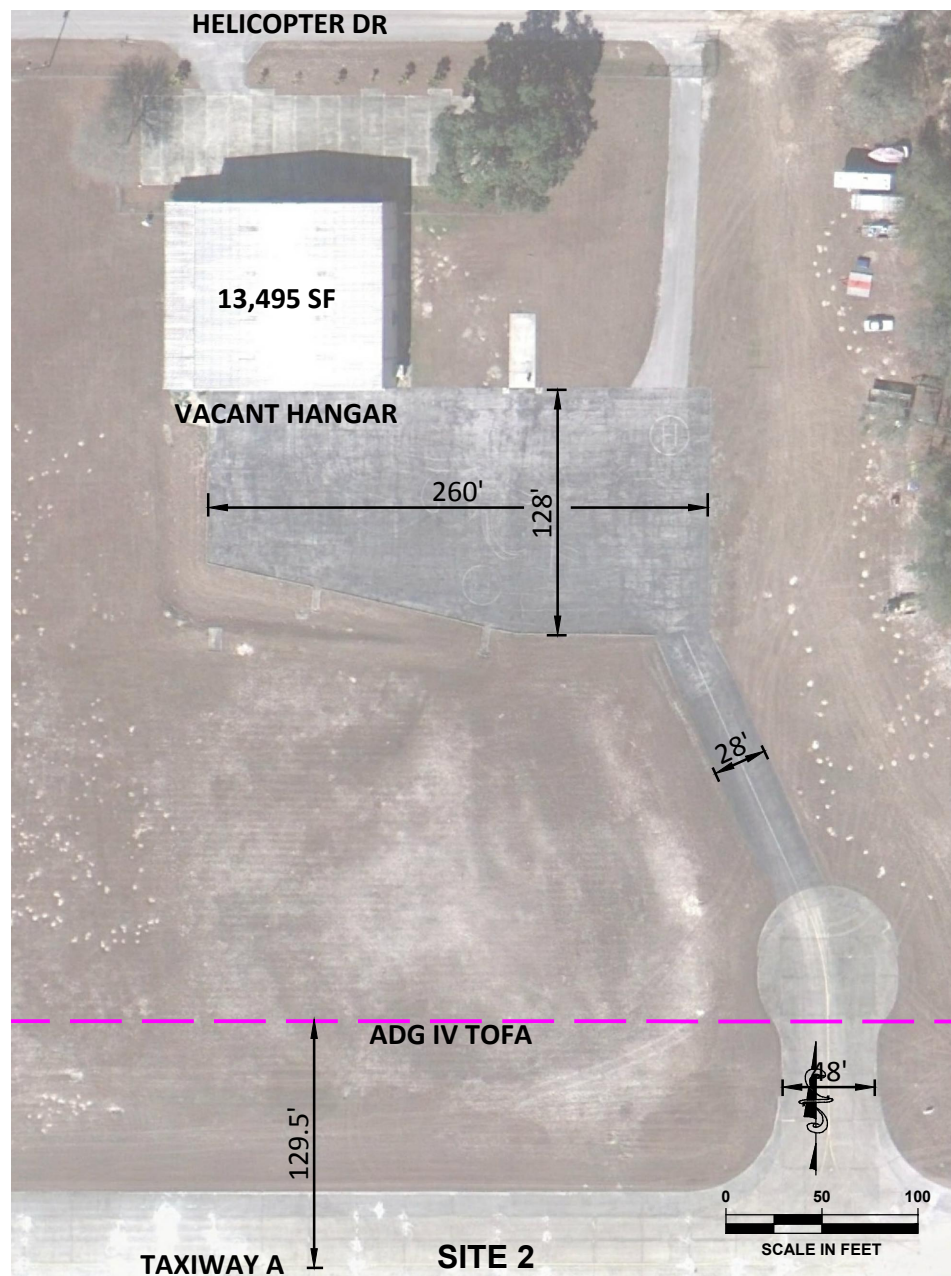
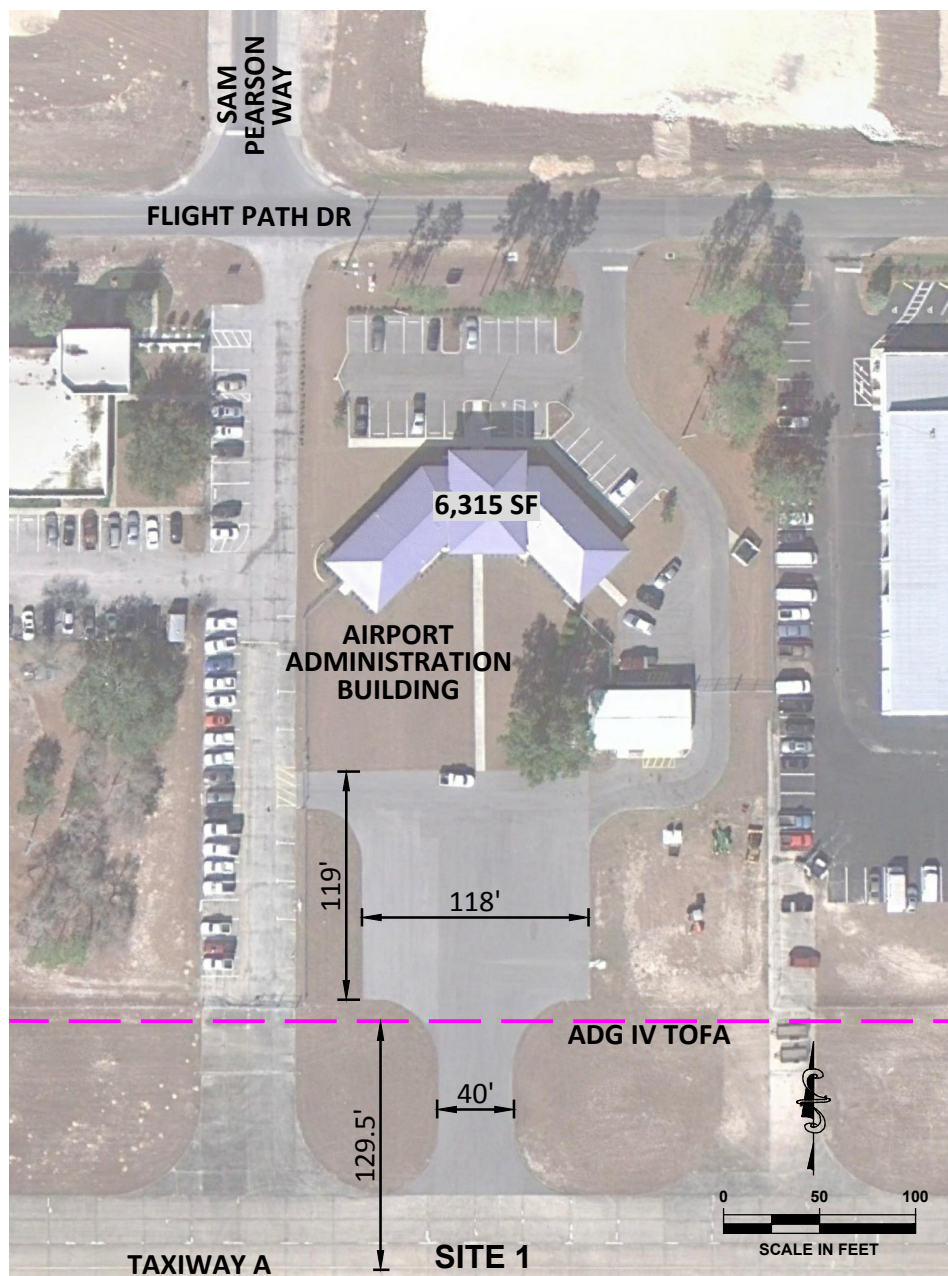


Figure 8 CBP Site Development Options

Site 1

Site 1 is located at the existing Airport Administration Building near the western end of Runway 9-27 (Runway 9 end). As shown, the building footprint comprises approximately 6,315 square feet and the interior could be modified to provide the necessary CBP elements in the east wing of the building. If modified, the east wing would essentially be separated from the remainder of the building and separate airside and parking lot entrances and exits would be provided. Staff currently located in that portion of the building from the Hernando County Office of Business Development could relocate to available space in the west wing. Architectural staff from Baker suggested that a replacement conference room could be constructed in the foyer of the building using glass partitioned walls, if desired. The estimated cost per square foot to reconfigure the Airport Administration Building to meet CBP requirements is \$110. Assuming that the UFA facility would occupy 2,000 square feet, that equates to \$220,000 plus design fees and the cost for a replacement conference room.

With regards to the apron area in Site 1, the entire paved area would essentially be restricted to CBP operations, although exceptions can be made by the port director (who is generally the CBP officer). Expansion of the apron is currently constrained by the TOFA of Taxiway A to the south, tenant leaseholds to the east and west, and buildings to the north. That presents an issue for larger jets that may want to access the CBP facility under their own power as opposed to having to be towed out of the apron. **Figure 9** presents an example of jet turnaround operations on the apron by ADG, which may not be an ideal maneuver due to the tight space and the effects of jet blast in the surrounding area. As shown, it is anticipated that some modification and expansion of the apron would be needed in order for larger aircraft to be able to enter and exit the facility under their own power. **Figure 10** illustrates a more ideal scenario for ADG III aircraft that includes two different taxilanes for entering and exiting the apron area, but requires disturbing a portion of the adjacent leaseholds and also relocating the maintenance building. Therefore, the feasibility of utilizing Site 1 may be dependent upon those issues. The strength of the existing pavement would also need to be evaluated in order to determine if strengthening would be needed to accommodate certain aircraft.

Of the three potential sites evaluated, Site 1 would likely cost the least to provide a suitable CBP building and apron because much of the infrastructure is already in-place; however, it also has the least expansion capability and disruptions to existing facilities and leaseholds may be required in order to accommodate larger aircraft.

Site 2

Site 2 is located at a vacant hangar on the east end of Runway 9-27 (Runway 27 end). The property is currently available for sale and is listed at \$485,000.⁴ The hangar has an attached office and there is also an aboveground fuel tank on this site. If this site were utilized for a CBP facility, Baker architectural staff recommends the construction of a new CBP building. That would eliminate the need to reconfigure a large hangar and take away from its intended purpose to store aircraft. Furthermore, due to the secure airside and interior requirements for CBP facilities, there would be limited complementary entities that could make shared use of the

⁴ Price is based on listing with Tommie Dawson Realty in February 2014.

reconfigured hangar. The estimated cost per square foot to construct a new CBP building is \$210. Assuming that the UFA facility would occupy 2,000 square feet, that equates to \$420,000 plus design fees; however, the initial acquisition cost of \$485,000 would also need to be accounted for.

Unlike Site 1, the apron at Site 2 has the ability to expand to accommodate larger jets and several aircraft at one time. The main drawbacks of Site 2 are the initial acquisition cost and the fact that the Aviation Authority would have a large hangar that may not be able to attract a tenant that would be complementary to CBP (due to CBP security requirements and other factors). Furthermore, if the Aviation Authority were to purchase the hangar and utilize the property for CBP, it may eliminate the potential for a revenue-generating tenant to utilize and maintain the property in the future as opposed to a CBP facility which must be paid for and maintained by the Aviation Authority. The costs for Site 2 may be comparable to the construction of a completely new facility elsewhere on the airport property, particularly when the costs to maintain the large hangar are factored in.

Site 3

There are clearly various pros and cons associated with Sites 1 and 2. The other option would include the construction of a completely new CBP building and apron on an undeveloped portion of the airport property. This would allow for the construction of a secure and isolated CBP facility that could be expanded to meet user demands. It is anticipated that the apron development costs would comprise the largest portion of the cost for Site 3, but it may be eligible for FAA Airport Improvement Program (AIP) funding. Figure 10 also illustrates a potential CBP facility layout for ADG III aircraft. The estimated costs to construct such a new facility are provided below.

- ➔ CBP Building – \$420,000
- ➔ Apron – \$550,000
- ➔ Road and Parking – \$130,000
- ➔ **Total – \$1,100,000**

Brooksville-Tampa Bay Regional Airport

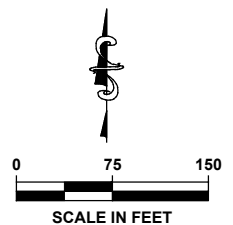
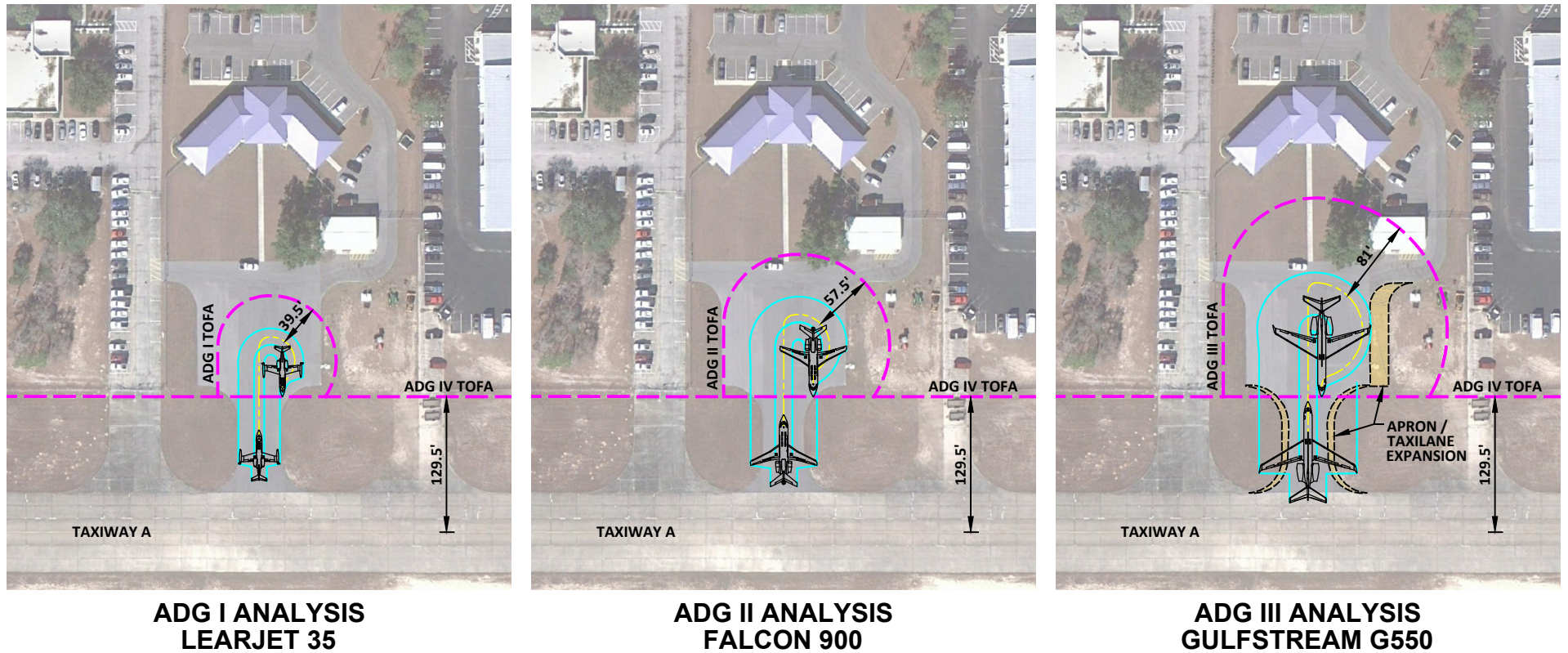


Figure 9 Apron Analysis

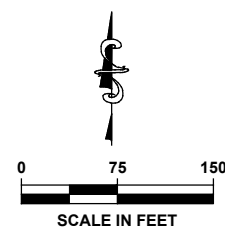


Figure 10 ADG III Apron Scenario

Financial Analysis

Regardless of what the preferred development site would be for a CBP facility at BKV, this analysis has shown that the Aviation Authority would have to cover the initial costs to either reconfigure an existing facility or construct a new facility to meet CBP requirements, in addition to other costs related to apron pavement (expansion, strengthening, etc.). Those costs would have to be realized at the project outset and may come from a combination of Aviation Authority funds, AIP funds, Florida Department of Transportation (FDOT) grants, some sort of municipal bond or loan, or other county or special grant funds. Each year, the Aviation Authority would be responsible for CBP staffing, data processing, and other facility costs. Using user fees that are consistent with those charged at UFA facilities throughout Florida and the U.S. and the forecasts previously shown in Table 7, **Table 9** presents an analysis of what the Aviation Authority might have to contribute to cover the annual staffing and data processing costs for the CBP (i.e., not including the initial construction costs). Overtime fees were not included in this analysis because it was assumed that any fees collected would be directly invoiced by CBP. Information used to conduct this fee analysis is an estimate based upon the tenant survey and interviews and may not reflect what actually would occur at BKV. Consequently, the Aviation Authority may need to pay approximately \$55,000 in the first year of operation of the CBP facility simply for staffing. The annual out-of-pocket costs of approximately \$24,000 include operational cost estimates for utilities and routine maintenance. Beyond the initial year of operation, it is estimated that expenses will total approximately \$150,000 annually. As activity increases, the deficit is anticipated to decrease to approximately \$23,000 annually. Based upon the fee structure and fleet mix used in this analysis, the proposed UFA would need to process a minimum of 560 arrivals annually to breakeven. This breakeven point represents approximately 140 clearances above and beyond the number of estimated annual clearances identified by the tenants surveyed for this study. For example, this shortfall represents approximately 2 to 3 additional clearances per week that could be associated with new on-airport business activity (maintenance, corporate, etc.) developed as a result of developing the proposed UFA.

After the Aviation Authority has taken the opportunity to review the pros and cons associated with the three CBP sites, and to discuss potential options for financing the initial CBP facility construction and annual staffing costs, it will be possible to determine a preferred development plan and to conduct a more focused evaluation of short-term and long-term costs.

Table 9 BKV CBP Cash Flow Analysis																
Variable	SEP (\$75)		MEP (\$100)		TP (\$150)		Jet (<20) (\$200)		Jet (20+) (\$300)		Total	Total Fees	Inspector Cost	Operational Costs	Data Costs	Airport Net
Baseline Year Clearances	7	\$525	27	\$2,700	13	\$1,950	79	\$15,800	296	\$88,800	422	\$109,775	\$140,874	\$4,800	\$19,052	(\$54,951)
Baseline Year +1	7	\$525	27	\$2,700	13	\$1,950	80	\$16,000	300	\$90,000	427	\$111,175	\$123,438	\$4,800	\$19,052	(\$36,115)
Baseline Year +2	7	\$525	28	\$2,800	13	\$1,950	81	\$16,200	304	\$91,200	433	\$112,675	\$123,438	\$4,800	\$19,052	(\$34,615)
Baseline Year +3	7	\$525	28	\$2,800	13	\$1,950	82	\$16,400	307	\$92,100	437	\$113,775	\$123,438	\$4,800	\$19,052	(\$33,515)
Baseline Year +4	7	\$525	28	\$2,800	14	\$2,100	83	\$16,600	311	\$93,300	443	\$115,325	\$123,438	\$4,800	\$19,052	(\$31,965)
Baseline Year +5	7	\$525	29	\$2,900	14	\$2,100	84	\$16,800	315	\$94,500	449	\$116,825	\$123,438	\$4,800	\$19,052	(\$30,465)
Baseline Year +6	8	\$600	29	\$2,900	14	\$2,100	85	\$17,000	319	\$95,700	455	\$118,300	\$123,438	\$4,800	\$19,052	(\$28,990)
Baseline Year +7	8	\$600	29	\$2,900	14	\$2,100	86	\$17,200	323	\$96,900	460	\$119,700	\$123,438	\$4,800	\$19,052	(\$27,590)
Baseline Year +8	8	\$600	30	\$3,000	14	\$2,100	87	\$17,400	327	\$98,100	466	\$121,200	\$123,438	\$4,800	\$19,052	(\$26,090)
Baseline Year +9	8	\$600	30	\$3,000	15	\$2,250	88	\$17,600	331	\$99,300	472	\$122,750	\$123,438	\$4,800	\$19,052	(\$24,540)
Baseline Year +10	8	\$600	31	\$3,100	15	\$2,250	89	\$17,800	335	\$100,500	478	\$124,250	\$123,438	\$4,800	\$19,052	(\$23,040)
Source: Michael Baker Jr., Inc., 2014																

Hard-to-Quantify Benefits

There are several hard-to-quantify benefits associated with implementing a UFA facility at BKV that should also be recognized. The most relevant benefits are associated with the convenience factors that would be afforded to existing BKV tenants that could now utilize the facility instead of conducting a stopover to clear customs at other airports. Often pilots and crews prefer to avoid the lengthy process and inconvenience encountered at commercial service airports by seeking out a regional User Fee based CBP location. Stopovers cost money for the added fuel and maintenance that is required to conduct an additional takeoff and landing and they also generate more crew time. Consequently, by implementing a UFA facility at BKV, there could be a significant cost savings for existing and potential airport users. Benefit-Cost Analyses (BCAs) are often conducted to determine if the benefits of investing in such a facility outweigh the costs to construct, maintain, and staff the facility.

The FAA report, *Economic Values for FAA Investment and Regulatory Decisions, a Guide*, presents cost variables that may be utilized within BCA studies for capacity-improving airport projects. Although a UFA facility does not fit into that category, the cost variables were reviewed to illustrate the hypothetical savings that could be realized by the three airport tenants that responded to the questionnaire. For example, the FAA report indicates that general aviation jets that weigh more than 12,500 pounds and less than or equal to 65,000 pounds had an average cost per hour of \$1,868 in 2002 dollars, which includes the cost for crew, fuel and oil, and maintenance. When adjusted for inflation, that equates to \$2,438 in 2014 dollars. Assuming that each stopover that is currently conducted generates an additional half hour of jet utilization, then the provision of a UFA facility at BKV may save jet operators \$1,219 per clearance compared to the current scenario. If 375 jet clearances are conducted in the first year after a UFA facility opens at BKV, it could translate into a savings of \$457,125 for the jet operators (less CBP fees). Throughout the course of the 10-year forecast period, a total savings of \$5,353,848 may be realized by the jet operators (less CBP fees). Although these numbers are speculative, it is known that the UFA facility would provide existing and potential airport tenants with a cost savings compared to having to conduct a stopover at another airport. That savings may be used to expand their facilities at BKV and to hire new employees in Hernando County. Furthermore, because the three businesses that responded provide on-demand medical and AOG maintenance services, they require crew to be available to conduct critical missions. The provision of a UFA facility at BKV and the elimination of a stopover would allow crews to be able to arrive at their home base quicker and to get the appropriate rest before conducting another mission.

Since 2004, the number of based jets at BKV has increased from three to 14, many of which are used by these global on-demand operators. As demonstrated above, there are benefits for those companies to base their aircraft at an airport with CBP services and BKV has a significant amount of land available to develop new aviation-related facilities. There are several additional hard-to-quantify benefits that could be discussed such as the additional spending that would occur at the airport for fuel and other services, the increased safety associated with reducing stopovers for BKV based pilots, improved airport security, flexibility in CBP hours of operation, the ability to potentially use the CBP facility as a marketing tool for recruiting new airport tenants and revenue sources (aviation and non-aviation related), and the ability to attract foreign visitors (tourism) and investors. The most noteworthy point is that the benefits may not

necessarily be reflected in the airport's finances; rather, they would be passed along to airport users and businesses that may be taxpayers within Hernando County. Over time, the businesses may use the savings to further promote the creation of jobs and the expansion or retention of existing facilities at BKV. These are all possibilities that should, at a minimum, be considered in the decision whether to pursue a UFA facility at BKV.

Summary

This study presented a number of variables that should be considered when weighing the potential to implement a UFA facility at BKV. It is important to emphasize that some of the information used in this study is an estimate based upon the tenant survey and interviews and may not reflect what actually would occur at BKV. Although it has been shown that such a venture may not be financially self-sustainable on its own, there appears to be a reason why other airports continue to provide UFA CBP services, particularly in Florida. At LEE, the owners of The Villages determined that it was valuable to pay for the CBP building and a large share of the annual staffing costs. At APF, the Naples Airport Authority thought it would be a valuable service for airport users and looked at it as a potential economic development opportunity. Existing tenants at BKV, such as JET I.C.U., Corporate Jet Solutions, Inc., American Aviation, Inc., and Global Jetcare, would realize a cost savings if a CBP facility were provided because it would eliminate the need to conduct a prior stopover. Furthermore, the potential for additional visitors to BKV may correlate to additional spending in the local area. These hard-to-quantify benefits are also important considerations for a potential UFA facility.

It is understood that additional information may be needed by the Aviation Authority and BOCC before a decision regarding the UFA facility can be made. The purpose of this study was to generally describe the level of financial commitment that may be necessary and to show CBP development options. If a preferred development option is selected, it would be possible to conduct more detailed cost estimates and financial evaluations based on input from the Airport Authority and BOCC.

If a UFA facility is pursued at BKV, the following list provides a more detailed breakdown of the steps that would need to be conducted as part of the application process:

- ➔ Request a letter of continued support from Florida Governor Rick Scott supporting the user fee airport designation addressed to the Commissioner of CBP.
- ➔ Request a meeting with local CBP officials to discuss Hernando County's desire to proceed with establishing a UFA facility at BKV.
- ➔ Meet with various agency representatives to discuss possible funding resources that may be used to construct the proposed UFA facility.
- ➔ Obtain CBP consent to establish a UFA facility at BKV.
- ➔ Negotiate with a consultant to provide full design services for the proposed UFA facility.
- ➔ Obtain CBP design approval.
- ➔ Submit for local building permits and site plan approval.
- ➔ Solicit construction bids and select contractor to construct the facility.
- ➔ CBP officials will conduct an initial site visit to discuss workload and services.

- ➔ CBP officials will conduct a site visit to verify that facilities are 85% complete and adequate for inspectional services to be provided.
- ➔ CBP officials will conduct a final site visit to discuss workload and services and verify that facilities are adequate for inspectional services to be provided.
- ➔ Complete a MOA with CBP which states the responsibilities, fees, and hours of service.
- ➔ Complete an ACA with CBP for handling international garbage.

Appendix A
Letters from Governor, CBP and Key Stakeholders



RICK SCOTT
GOVERNOR

December 19, 2012

Ms. Janet Napolitano
Secretary
Department of Homeland Security
U.S. Department of Homeland Security
245 Murray Lane, SW
Washington, D.C. 20528-0075

RECEIVED
BOARD OF COUNTY COMMISSIONERS
HERNANDO COUNTY
2012 DEC 21 PM 12:20

Dear Secretary Napolitano:

I am writing to indicate my support and ask for your positive consideration of Hernando County's application to the United States Borders and Customs Agency seeking "user fee" airports status, which will allow the airport to handle international passengers and aircraft.

There has been an effort over the past two years to increase Customs staff at airports around the State of Florida. With the addition of Hernando County's status, it will not only alleviate some of the burden other airports are facing, but it will increase business opportunities and job creation in the County.

Hernando County Airport is currently home to two air ambulance companies which provide International service to their clients. Both companies have requested the availability of this service at the airport and have indicated that it would be a substantial benefit not only to their companies, but to the businesses they serve in the County.

In addition, the airport, with its continuing marketing program, is having success in generating interest from the international business aviation community. A number of companies that have shown an interest in opening a facility in Hernando County have expressed that having a Customs facility located at the airport would greatly enhance their desire to do business there.

Ms. Janet Napolitano
December 19, 2012
Page Two

On October 15 of this year, the Brooksville Airport Traffic Control Tower was commissioned to improve safety for general, corporate and military aviation at their facility. The addition of a U.S. Customs facility at the airport would show Hernando County's commitment to serving the aviation community and the continued growth of business in Florida.

I wholeheartedly support Hernando County's efforts and respectfully request you approve their application to be designated as a "user fee airport."

Sincerely,

A handwritten signature in black ink, appearing to read "Rick Scott", with a large, stylized initial "R" and a long, sweeping underline.

Rick Scott
Governor

cc: David V. Aguilar, Deputy Commissioner, U.S. Customs and Border Protection
The Honorable Rich Nugent
The Honorable Bill Nelson
Mr. Gary Schraut, Chairman, Hernando County Airport and Aviation Authority
The Honorable Wayne Dukes, Chairman, Hernando County Commission
• **Mr. Leonard Sossamon, Hernando County Administrator**



U.S. Customs and
Border Protection

Deputy Commissioner

January 31, 2013

The Honorable Rick Scott
Governor of Florida
State Capitol
Tallahassee, Florida 32399

Dear Governor Scott:

Thank you for your recent letter to Secretary of Homeland Security Napolitano supporting Hernando County Airport's (KBKV) request to be designated a User Fee Airport (UFA). The Secretary has asked that I respond to you.

Under 19 U.S.C. § 58b and 19 C.F.R. § 122.15, UFAs are airports where the value or volume of business at the location is insufficient to justify, without a fee, the provision of customs services to process aircraft, their passengers, and cargo entering the United States. Establishing international clearance operations at KBKV would require a significant commitment of resources by both the airport authority and U. S. Customs and Border Protection (CBP). The primary focus of such an effort would be to work with airport representatives to ensure required facility standards are in place to provide for the safe, secure, and efficient clearance of international-passenger arrivals.

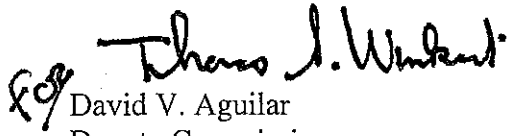
The proposed facility must comply with the CBP Airport Technical Design Standards, which have been provided to the airport authority. The design standards outline the requirements for a Federal Inspection Service area that has the appropriate dimensions needed to clear international arrivals. While having a facility that meets CBP standards is a key driver in this process, CBP would also need a firm workload commitment from KBKV that includes anticipated flight and passenger arrivals. This information will permit CBP and the airport to determine appropriate staffing.

CBP understands this issue is important to the City of Brooksville and to the Hernando County region. Our local component office is conducting an internal review of the request. We hope to have the review completed 90 days from the date of this letter. We will contact you once it is completed.

The Honorable Rick Scott
Page 2

Thank you for your interest in U.S. Customs and Border Protection. Should you need additional assistance, please do not hesitate to contact my office at (202) 344-2001.

Sincerely,


David V. Aguilar
Deputy Commissioner

cc: The Honorable Rich Nugent
U.S. House of Representatives

The Honorable Bill Nelson
U.S. Senate

Mr. Gary Schraut
Chairman
Hernando County Airport and Aviation Authority

The Honorable Wayne Dukes
Chairman
Hernando County Commission

Mr. Leonard Sossamon
Hernando County Administrator



2561 Rescue Way
Brooksville, FL 34604
PH - 352-796-2540 / FX - 352-796-2549

April 22, 2014

Kevin Daugherty
Airport Manager
Brooksville-Tampa Regional Airport
15800 Flight Path Drive
Brooksville, FL 34604

Dear Mr. Daugherty,

I strongly support the efforts of the Aviation Authority for the Brooksville-Tampa Regional Airport to become a User Fee Airport. As a Hernando County Business owner, I would agree that having a customs facility in Hernando County will not only be an asset personally to my company but the facility and its services will benefit our community, in many ways.

For my business, Worldwide Aircraft Services, Inc. d/b/a JET I.C.U., benefits will include, but not limited to, quicker response times to transport critically ill patients and increased sales due to the ability to offer lower quotations to consumers by decreased pilot duty time, fuel charges, landing fees and any additional airport fees.

Furthermore, there are numerous advantages and benefits for the airport to have US Customs and Border Protection capabilities. Benefits, including but not limited to, the below:

Overall Economic Advantages:

- Critical to Keep Hernando County as well as its surrounding counties ***“Open for Business”***
- Provides Job Creation, Business Recruitment, Business Expansion and Business Retention
- Provides an attraction for new businesses such as Corporate Headquarters and Targeted Industries to Hernando County and its surrounding counties.
- Enhances Hernando County, as well as its surrounding counties, as a ***“Destination location”***
- Increases Tourism
- Provides a “convenience” for Hernando County, as well as its surrounding counties, residents /visitors and businesses that have to travel to Tampa, St. Petersburg or Orlando to clear customs.

Brooksville-Tampa Regional Airport Benefits:

- Increases Revenue from the Additional Fuel Flowage Fees and non-aviation revenue sources

(continued)

- Increases safety measures by reducing landing and take offs for Hernando County businesses and residential aircraft owners by providing a Direct Route to this Destination verses stopping somewhere else, alternative for TPA, PIE and ORL
- Increases opportunity for non-aviation business development
- Reduces aircraft operational and maintenance costs
- Grant Funding to cover construction of required building
- Creates New Rental Revenue Source
- Creates a New Building Facility Asset
- Improved Security for the Airport and its surrounding businesses
- Increases International Air Ambulance Service and International Aid Inbound or Outbound
- Control over hours of operation within curfew hours.

As you can see from the above, we can greatly benefit by having a User Fee Airport in Hernando County and I will be more than willing to assist the Aviation Authority, in any way, to support this project.

Sincerely,



Michael Honeycutt

President

Corporate Jet Solutions, Inc.

15421 Technology Drive
Brooksville, FL 34604
352-593-4109 Office
352-593-5988 Fax
www.corporatejetinc.com

April 17, 2014

Brooksville Hernando County Airport
15800 Flight Path Drive
Brooksville, FL 34604
Attn: Kevin Daugherty

Re: Customs Availability in Brooksville

Dear Mr. Daugherty:

It is with great excitement that I am writing this letter on behalf of Corporate Jet Solutions, Inc. "CJS" in regard to the aforementioned subject. CJS has been a proponent of the potential of having customs on site at KBKV. To this extent, find below our reasoning to show not only the need, but the expanded opportunities to the general area.

The name change to the Brooksville Tampa Bay Regional Airport was in part due to the growth in a northern fashion from the greater Tampa Bay area towards Hernando County. This growth which has already happened in the "New Tampa" areas of Wesley Chapel, Lutz, Land of Lakes and into Pasco County is direct proof that the population is moving northward. This growth is bringing new opportunities to the area, which means the infrastructure must grow to accommodate the changes to the demographics.

Some of these changes that have begun are several new hospitals which have the need for services such as customs. With two air ambulance providers on the field at KBKV with a greater opportunity to use the field as a destination show one facet for the need to the area. Additionally, many of their passengers are from cruise ships and having a direct destination with lower fuel costs, no landing fees and a control tower that is in place could potentially increase the area as a port of entry. With these flights alone, area hotels, hospitals, restaurants and other service providers would see an increase in revenues which translates to more tax dollars in our county.

With two Fixed Base Operators "FBO" on the field and a changing client base that attracts more corporate jet traffic to KBKV, an increase of custom utilization will occur. Examples are major repair work is more available with large operators that are out of the country, but still have "N" registered aircraft. We now have owners in the air park that are out of the country and they have to clear in other states along their routes. This is not only inconvenient, but it costs fuel sales due to the operators not being able to tanker fuel from KBKV.

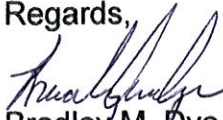
Corporate Jet Solutions, Inc.

15421 Technology Drive
Brooksville, FL 34604
352-593-4109 Office
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www.corporatejetinc.com

Given the aforementioned items, having customs on the field can provide an immediate service to our customers. In addition, with the customs, we can market to bring additional aviation related industries to the area. Bottom line, if we sell more fuel, make our occupancy rate go up on motels and hospitals, provide greater revenue to service and merchants....it just makes good business sense.

CJS looks forward to escalating discussions and will provide whatever support that we can provide to move this project forward.

Regards,



Bradley M. Dye
Vice President



April 17, 2014

Kevin Daugherty, Manager
Brooksville – Tampa Bay Regional Airport
15800 Flight Path Drive
Brooksville, Florida 34604

Dear Kevin,

American Aviation supports the establishment of a User Fee Based Customs and Border Patrol facility here at Brooksville -Tampa Bay Regional Airport. Founded in 1978, American Aviation has grown along with the airport. From early days as a flight school to our current status as one of the southeast's premier FAA certified repair stations and award-winning full service flight centers, American has helped write the history of this airport.

Paralleling the growth here at American Aviation, the Hernando County Aviation Authority and airport management have invested in ways to maximize this airport's potential for aviation. Such improvements include the ILS and multiple GPS approaches, an on-site fire station and an air traffic control tower. A sound next step to ensure a full offering of amenities is to introduce the opportunity for on-site Customs clearance. Not only will some airport businesses that operate international flights benefit, but American Aviation customers will also enjoy the added level of service.

Beyond cost savings and value-added service options, I believe there is potential for additional airport business because many pilots and crews prefer Customs clearance at regional airports. In order to avoid the lengthy process and inconvenience encountered at commercial airports, flight crews will often seek out a regional User Fee based CBP location. Being only one of two User Fee alternatives on Florida's west coast, there is great opportunity for BKV to capture international operator market share. For American Aviation, this translates in to additional business and job opportunities. Further, with over 130 businesses based here and its convenient location, Brooksville-Tampa Bay Regional Airport may become a preferred option for international travel in the north Tampa Bay region.

Sincerely,



John Petrick, Owner
American Aviation

April 21, 2014

Kevin Daugherty
Airport Manager
15800 Flight Path Drive
Brooksville, FL 34604

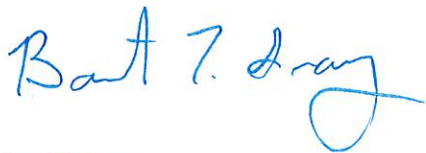
Dear Mr. Daugherty,

I am writing to express my support for the addition of a Customs and Border Protection facility at the Brooksville - Tampa Bay Regional Airport.

Global Jetcare, Inc. is an international air ambulance company which currently operates three Learjet aircraft. We currently utilize the Customs and Border Protection facility at the Tampa International Airport (KTPA) approximately 200 times per year for inbound and outbound clearances. The addition of a CBP facility at the Brooksville – Tampa Bay Regional Airport would be extremely beneficial both financially and logistically as we grow our business here in Hernando County.

If there is anything I can do to help support the addition of a CBP office at the Brooksville – Tampa Bay Regional Airport please do not hesitate to ask.

Sincerely,



Bart T. Gray
President


www.globaljetcare.com

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