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Subcommittee on Aviation
United States House of Representatives**

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Update on the Safety and Cost Aspects of the Federal Aviation Administration's Contract Tower Program

**Statement of
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Mr. Chairman and Members of the Subcommittee:

Thank you for inviting me to testify on the Federal Aviation Administration's (FAA) Contract Tower Program. There are currently 250 contract towers nationwide providing air traffic control services to a wide range of users, including general aviation, commercial and cargo carriers, and the military. Since its inception 30 years ago, the program has successfully served airports that otherwise would not have air traffic control services, thereby increasing the level of safety for those pilots and communities.

Between 1998 and 2003, we completed four reviews of the Contract Tower Program.¹ Overall, we found little difference in the safety or quality of services provided by similar FAA and contract towers. We also found that the contract towers provided air traffic services to low-activity² airports at lower costs than the Agency could otherwise provide. At the request of the House Committee on Appropriations, we initiated a new review of the program. My testimony is based on our ongoing work and will focus on (1) the Contract Tower Program's safety aspects and overall user satisfaction, (2) whether the program remains cost-efficient, and (3) actions FAA can take to improve program oversight. Exhibit A provides a detailed explanation of our methodology. Exhibits B and C list the locations of all contract towers and 92 comparable FAA towers.

IN SUMMARY

Contract towers continue to provide safe air traffic services and are strongly supported by users. Our ongoing work has found that contract towers had a lower number and rate of reported safety incidents³ than similar FAA towers and that Agency safety evaluations found fewer deficiencies with contract towers. Users did not raise any safety concerns regarding the services provided by contract towers and believe the services they receive from contract towers are comparable to those from similar FAA towers. Contract towers also continue to provide cost-efficient air traffic control services, with the average contract tower costing roughly \$1.5 million less to operate annually than a comparable FAA tower—due largely to lower staffing and salary levels. However, FAA can take certain actions to improve its oversight of the program. These actions include implementing a voluntary safety incident reporting program at contract towers,

¹ OIG Report No. AV-1998-147, "Federal Contract Tower Program," May 18, 1998; OIG Report No. AV-2000-079, "Contract Towers: Observations on FAA's Study of Expanding the Program," April 12, 2000; OIG Report No. AV-2002-068, "Audit Report on Subcontracting Issues of the Contract Tower Program," December 14, 2001; OIG Report No. AV-2003-057, "Safety, Cost, and Operational Metrics of the Federal Aviation Administration's Visual Flight Rules Towers," September 4, 2003. OIG reports are available on our Web site: <http://www.oig.dot.gov>.

² Low activity towers are generally located at airports near smaller cities that are served by commuter airlines rather than major carriers. In many instances, there is no scheduled carrier operating from the airport and the activity consists of private, business, and general aviation operations.

³ Safety incidents include operational errors, operational deviations, and runway incursions. An operational error occurs when an air traffic controller does not maintain minimum separation between two aircraft or between an aircraft and terrain or obstacles. An operational deviation occurs when a controller allows an aircraft to enter airspace managed by another controller without prior coordination and approval. A runway incursion is any incident involving an unauthorized aircraft, vehicle, or person on a runway.

implementing processes to regularly evaluate contract towers as required by Congress, and reviewing annual labor hours worked to determine if the contractors provide the level of service called for in the contract.

BACKGROUND

In 1982, FAA began the Contract Tower Program as a pilot program to contract air traffic services for five low-activity towers that were closed as a result of the Professional Air Traffic Controllers Organization strike. In 1994, Congress provided funding for a multi-year program to convert additional FAA low-activity towers to contract operations. The program was further expanded in 1998 when Congress provided funding for a cost-sharing program, which allows airports that would not normally qualify for the program access by permitting the airport sponsors to pay for a portion of the costs to operate the tower, with FAA providing at least 80 percent of the cost.

Currently, there are 250 towers in the Contract Tower Program across 46 States⁴ and 4 territories; 228 towers are fully funded by FAA, 16 are part of the cost-share program, and 6 towers are used by the Air National Guard.⁵ Three contractors provide staff to operate the towers in seven geographic areas.⁶ The current contracts, which run from February 1, 2010, to September 30, 2014, are worth nearly \$600 million. FAA's Contract Tower and Weather Group (CTWG) within the Air Traffic Organization (ATO) oversees the administrative functions of the program, and FAA's Aviation Safety Organization (AVS) provides safety oversight. FAA is requesting \$138 million in fiscal year 2013 for the Contract Tower Program.

CONTRACT TOWERS CONTINUE TO PROVIDE SAFE SERVICES AND ARE SUPPORTED BY USERS

Overall, contract towers reported a lower number and rate of safety incidents, and FAA facility evaluations identified fewer deficiencies with contract towers than with similar FAA towers. In addition, users continue to support the program and are satisfied with the safety and quality of the services provided by contract towers.

Contract Towers Have a Lower Number of Reported Safety Incidents and Deficiencies Than Comparable FAA Towers

When compared with comparable FAA towers, contract towers reported both a lower number and lower rate of operational errors, operational deviations, and runway

⁴ The four States without a contract tower are Delaware, Maine, Rhode Island, and Vermont.

⁵ The six Air National Guard Towers are included in the Contract Tower Program under a special agreement with the Department of Defense.

⁶ The three contractors are Robinson Aviation (RVA) Inc., Midwest Air Traffic Control Service Inc., and Serco, Inc.

incursions in fiscal year 2010.⁷ Table 1 shows our comparison of these safety incidents reported at 240 contract towers and 92 comparable FAA towers.⁸

Table 1. Number and Rate of Fiscal Year 2010 Safety Incidents at Comparable Contract and FAA Air Traffic Control Towers

Towers	Total Number of Safety Incidents			Incident Rate Per One-Million Operations		
	Operational Errors	Operational Deviations	Runway Incursions	Operational Errors	Operational Deviations	Runway Incursions
240 Contract	18	12	167	1.24	0.83	11.55
92 FAA	52	35	275	4.54	3.06	24.01

Source: OIG analysis of FAA data

FAA’s periodic evaluations of air traffic facilities’ compliance with FAA directives also indicate that fewer procedural, training, and administrative deficiencies are found at contract towers. Facility evaluations for a sample of 30 contract towers conducted between May 2006 and September 2010 and a sample of 30 comparable FAA towers conducted between January 2007 and September 2010 identified a total of 156 deficiencies at the 30 contract towers and 338 deficiencies at the 30 FAA towers. While none of the deficiencies cited were serious in nature, some of the most frequently identified deficiencies at both contract and FAA towers include outdated training records, inadequate quality assurance reviews by facility managers, incomplete supplemental controller training, and improper position relief briefings and radio communications by controllers.

Users Are Satisfied With the Level and Quality of Services Provided by Contract Towers

As we have reported previously, pilots, flight instructors, airport officials, fixed-based operators,⁹ and representatives from airport and general aviation organizations support the Contract Tower Program. Specifically, users at 12 contract towers and 7 FAA towers we visited during our current review were satisfied with the services provided by contract towers and the three contractors and believed the services they receive were comparable to similar FAA towers. In several instances, pilots were surprised to learn that towers they frequently interacted with were actually contract towers and described the services provided by FAA and contract towers as “seamless.”

National and facility officials from the National Air Traffic Controllers Association (NATCA), who represent controllers at 63 contract towers, support the cost-share aspect of the current program. However, they raised concerns that contract towers have much

⁷ We began our review in June 2011, and the fiscal year 2010 data were the most complete and updated yearly information available for our audit.

⁸ Identified by FAA as comparable towers.

⁹ Fixed-base operators are airport tenants that provide fueling, maintenance, or other aviation-related services.

lower staffing levels than comparable FAA towers, are often staffed with only 1 controller for portions of the day, and that controller certification training at contract towers can take as little as 30 days, while at an FAA facility it can take from 1 to 5 years.

We discussed NATCA’s concerns with FAA safety officials, local airport officials and pilots, and aviation associations that use contract towers. Overall, they stated that contract towers operate safely and did not have any concerns about staffing practices at contract towers. Contract tower controllers are required to meet the same certification requirements as FAA controllers and are certified by FAA. Additionally, most contract tower controllers are also former FAA or military controllers who must have a Control Tower Operator license in order to be hired and therefore generally require less time to become certified at their locations. Conversely, FAA generally hires controllers for its air traffic facilities with little or no air traffic experience who require more training in order to certify at its facilities.

CONTRACT TOWERS CONTINUE TO PROVIDE COST-EFFICIENT SERVICES

Contract towers continue to operate at lower costs than comparable FAA towers. Our comparison of costs¹⁰ at our sample of 30 contract towers and 30 FAA towers with similar air traffic densities¹¹ found that the average operations costs in fiscal year 2010 were about \$537,000 for a contract tower and about \$2.025 million for an FAA tower—a difference of \$1.488 million, or 277 percent (see table 2).

Table 2. Average Cost and Staffing Differences Between 30 Contract Towers and 30 Comparable FAA Towers

	Average Air Traffic Density	Average FY 2010 Cost	Average Number of Air Traffic Personnel
FAA Tower	15.55	\$2,025,104	16.23
Contract Tower	15.34	\$536,911	6.03
Average Difference	0.21	\$1,488,193	10.20

Source: OIG analysis based on data from FAA

The difference in cost is primarily due to two factors. First, contract towers are staffed at lower levels than the comparable FAA towers. The 30 contract towers in our sample had an average of 6 air traffic personnel at the facility, while the sample of 30 comparable FAA towers had an average of 16 air traffic personnel.¹² Second, contract tower

¹⁰ These costs included air traffic personnel compensation and benefits, travel and transportation, supplies, materials, and insurance. Infrastructure, maintenance, and equipment costs for FAA and contract towers were not included in our analysis because, under terms of the contract, contractors are not responsible for these costs. In addition, FAA’s FY 2010 estimated cost to administer the Contract Tower Program (\$2.23 million or about \$9,000 per contract tower) was not included in our cost calculation.

¹¹ Density is defined as the average number of operations at a tower per hour the facility is open.

¹² Air traffic personnel are defined as air traffic controllers, supervisors, and management.

controllers' salaries, which are based on Department of Labor wage rates, are lower than the salaries paid to FAA controllers. For example, based on current Department of Labor rates, an air traffic controller at the Albert Whitted Tower near Tampa, FL, would receive base pay of about \$56,000 per year, whereas an FAA-employed air traffic controller in Sarasota, FL, an area with a similar cost of living, would receive base pay ranging from about \$63,000 to \$85,000 per year, depending on experience.

FAA OVERSIGHT OF THE CONTRACT TOWER PROGRAM COULD BE IMPROVED

While the Contract Tower Program continues to provide cost-efficient air traffic services that are supported by users, there are opportunities for FAA to improve its oversight and strengthen program controls. These opportunities include implementing a voluntary safety incident reporting program at contract towers, implementing policies that require contract towers to receive regular safety reviews, and improving agency oversight over the contractual aspects of the program.

Accurate Incident Reporting at Contract Towers Is Critical To Maintaining Safety

Contract towers are required to follow the same process for reporting and documenting safety incidents as FAA facilities. However, according to two FAA studies that were conducted in 2009 and 2010, contract towers had a lower number of reported runway incursions than comparable FAA towers. The Agency determined that the main reasons for the difference were that contract tower controllers either did not know the current definition of a runway incursion or the criteria for classifying them. FAA also found that two-thirds of the contract towers reviewed had not submitted runway safety action plans for the previous 2 years.

In light of these findings, managers from FAA's Runway Safety Program office met with contractors and emphasized the importance of runway incursion prevention and reporting. Subsequently, a 2010 FAA study showed runway incursions reporting at contract towers had increased sharply.¹³ However, strong senior-level oversight and accountability by FAA and contractors, along with improved reporting mechanisms for all air traffic facilities, are needed to address ongoing concerns about the accurate reporting of runway incursions and other safety incidents. Additional oversight could help ensure accurate and comprehensive reporting of safety incidents at contract towers. This includes incorporating contract towers into a voluntary reporting system such as the Air Traffic Safety Action Program (ATSAP).¹⁴

¹³ "Study of Runway Incursion Reporting at Federal Contract Towers," ATO's Office of Safety, December 2010.

¹⁴ ATSAP is a voluntary, non-punitive safety reporting program that encourages controllers to report operational errors and other safety incidents.

New Oversight System Does Not Ensure That Contract Towers Receive Regular Safety Evaluations as Required by Congress

Prior to October 2010, FAA conducted evaluations of all air traffic facilities, including contract towers, every 3 years. In January 2012, FAA transitioned to a new data-driven, risk-based oversight system as its primary method to oversee air traffic facilities. Under the new system, safety incident data are analyzed to identify specific safety problems or trends at air traffic facilities. Based on this analysis, the Agency will then focus its oversight efforts on those identified issues or trends. However, if data are unavailable due to a lower rate of occurrence, are unreliable, or there are no trends to analyze, some low risk towers, including contract towers, could go years without being evaluated. Should there be lengthy periods between reviews of contract towers under this risk-based system, FAA may not meet the intent of new legislation that requires the Secretary to “establish uniform standards and requirements for regular safety assessments” of contract towers.¹⁵

FAA Can Improve Its Contractual Oversight of the Program

Finally, FAA has opportunities to improve its oversight of the contractual and operational aspects of the Contract Tower Program. This includes ensuring that the contractors are providing the level of service required by the contract. In 1998 we reported that contract towers were not staffed in accordance with contractor staffing plans. In response, FAA included a provision in subsequent contracts requiring contractors to submit a staffing plan that includes the number of controllers who will work at the tower and the total annual number of hours those controllers will work, exclusive of vacation, holiday, and sick leave. Once FAA approves the staffing plan, the contractors must comply with the staffing levels and hours of service called for in the plan, and actual hours worked must be within plus or minus 3 percent of the approved plan.

However, we found that the effectiveness of this control is limited because FAA does not review the actual annual hours worked by contractors. Instead, the CTWG only reviews the monthly reports provided by the three contractors. As a result, FAA may be paying for services that have not been provided and is possibly missing opportunities to recoup funds.

CONCLUSION

The Contract Tower Program has successfully contributed to FAA’s goal of ensuring the safety and cost-effectiveness of the air traffic control system. However, the continued success of the program will depend on effective follow through by FAA to enhance how it collects and uses safety data on contract towers so that they receive the appropriate level of oversight and to improve controls over the program’s contractual aspects to protect against any potential misuse of funds.

¹⁵ “FAA Modernization and Reform Act of 2012,” Sec. 147, Public Law 112-95, February 14, 2012.

This concludes my statement. I would be happy to address any questions from the Chairman or Members of the Subcommittee at this time.

EXHIBIT A. OIG METHODOLOGY FOR SAFETY AND COST ANALYSES

Universe of Contract and FAA Towers and Tower Samples Selected

The universe of contract towers consisted of 246 towers that were included in the Contract Tower Program as of February 2011. This includes 224 fully funded towers, 16 cost-share towers, and 6 towers that operated on behalf of the Air National Guard. The universe of FAA towers consisted of 92 towers that were selected by FAA as being comparable to contract towers.

To determine our sample of 30 contract and 30 FAA towers, we utilized a universe of 240 contract towers that were in the program as of February 2011 and excluded the 6 Air National Guard towers on the advice of the CTWG Program Manager because they were operated by the Department of Defense, not FAA. The OIG statistician, using FY 2009 and FY 2010 numbers of operations and hours of service, calculated the average density for each of 240 contract towers and 92 FAA towers. The statistician then selected a random sample of 30 contract towers where a tower's selection probability was proportional to its average density, which we used to select 30 similar FAA towers by matching the average density of each contract tower to a FAA tower.

Safety Analyses

To determine the number and rate of safety incidents (operational errors, operational deviations, and runway incursions) at contract towers and comparable FAA towers, we reviewed FY 2010 safety incident data provided by ATO's Office of Safety (ATO-S) for the 240 contract towers (excluding the 6 Air National Guard towers) and 92 FAA towers. We determined the total number of incidents for two groups of facilities and calculated the rate of per million operations for each type of incident.

To determine safety and other deficiencies identified by FAA at contract and FAA towers, we reviewed facility safety evaluations conducted by FAA between May 12, 2006, and September 29, 2010, for the 30 sampled contract towers and between January 24, 2007, and September 29, 2010, for the 30 sampled FAA towers from FAA's Facility Safety Assessment System (FSAS). We then identified the total number and type of deficiencies cited at each tower.

Cost Analysis

To determine the difference in cost between contract towers and comparable FAA towers, we reviewed the contractor's agreement with FAA to determine the contractor's responsibilities. We then compared similar FY 2010 costs for the sample of 30 contract towers and 30 FAA towers to determine the annual cost difference. These costs included air traffic personnel compensation and benefits, travel and transportation, supplies, materials, and insurance. Infrastructure, maintenance, and equipment costs for contract and FAA towers were not included in our analysis because, under terms of the contract,

contractors are not responsible for these costs. FAA's FY 2010 estimated cost to administer the Contract Tower Program, \$2.23 million or about \$9,000 per contract tower, was not included in our cost calculation.

EXHIBIT B. LIST OF CONTRACT TOWERS (AS OF MAY 2012)

State	Airport Name	Tower ID
AK	Bethel	BET
AK	Kenai	ENA
AK	King Salmon	AKN
AK	Kodiak	ADQ
AL	Brookley	BFM
AL	Dothan	DHN
AL	Tuscaloosa Municipal	TCL
AR	Fayetteville	FYV
AR	Northwest Arkansas Regional	XNA
AR	Rogers Municipal-Carter Fld (CS)	ROG
AR	Springdale Municipal (CS)	ASG
AR	Texarkana Muni/Webb Fld	TXK
AZ	Chandler	CHD
AZ	Flagstaff Pulliam	FLG
AZ	Glendale	GEU
AZ	Goodyear	GYR
AZ	Laughlin International	IFP
AZ	Ryan Field	RYN
AZ	Williams Gateway	IWA
CA	Castle	MER
CA	Chico Municipal	CIC
CA	Fullerton	FUL
CA	Hawthorne	HHR
CA	Mather	MHR
CA	Modesto	MOD
CA	Oxnard	OXR
CA	Palmdale	PMD
CA	Ramona	RNM
CA	Redding	RDD
CA	Riverside	RAL
CA	Sacramento Executive	SAC
CA	Salinas Municipal	SNS
CA	San Carlos	SQL
CA	San Diego Brown Field	SDM
CA	San Luis Obispo	SBP
CA	Santa Maria	SMX
CA	Victorville	VCV
CA	Whiteman	WHP
CA	William J. Fox/Lancaster	WJF
CO	Eagle County	EGE
CO	Front Range	FTG
CO	Grand Junction	GJT
CT	Bridgeport	BDR
CT	Danbury Municipal	DXR
CT	Groton- New London	GON
CT	Hartford-Brainard	HFD

State	Airport Name	Tower ID
CT	Tweed-New Haven	HVN
CT	Waterbury	OXC
FL	Albert Whitted	SPG
FL	Boca Raton	BCT
FL	Cecil Field	VQQ
FL	Charlotte County Airport	PGD
FL	Flagler County Airport	XFL
FL	Gainesville	GNV
FL	Hollywood/North Perry	HWO
FL	Jacksonville/Craig	CRG
FL	Key West	EYW
FL	Kissimmee Municipal	ISM
FL	Lakeland Municipal	LAL
FL	Leesburg Regional	LEE
FL	Melbourne	MLB
FL	Naples	APF
FL	New Smyrna Beach Municipal Arpt	EVB
FL	Ocala Airport	OCF
FL	Opa Locka	OPF
FL	Ormond Beach Municipal	OMN
FL	Page Field	FMY
FL	Panama City/Bay County	ECP
FL	Pompano Beach	PMP
FL	St Augustine	SGJ
FL	Stuart/Witham	SUA
FL	Titusville/Cocoa	TIX
GA	Anthens Municipal	AHN
GA	Fulton County	FTY
GA	Gwinnett County	LZU
GA	Macon	MCN
GA	Mc Collum	RYY
GA	SW Georgia/Albany-Dougherty	ABY
GU	Agana, Guam	GUM
HI	Kalaeloa (John Rogers Field) (ANG)	JRF
HI	Keahole-Kona	KOA
HI	Lihue	LIH
HI	Molokai	MKK
IA	Dubuque	DBQ
ID	Friedman Memorial/Hailey	SUN
ID	Idaho Falls	IDA
ID	Lewiston-Nez Perce County	LWS
ID	Pocatello Municipal	PIH
IL	Bloomington/Normal	BMI
IL	Decatur	DEC
IL	So. Illinois/Carbondale	MDH
IL	St. Louis Regional	ALN

State	Airport Name	Tower ID
IL	Waukegan Regional	UGN
IL	Williamson County (CS)	MWA
IN	Monroe County/ Bloomington (CS)	BMG
IN	Columbus Municipal	BAK
IN	Gary Regional	GYG
IN	Muncie/Delaware County (CS)	MIE
KS	Forbes Field	FOE
KS	Garden City Regional Airport (CS)	GCK
KS	Hutchinson Municipal	HUT
KS	Johnson County Executive	OJC
KS	Manhattan Regional	MHK
KS	New Century	IXD
KS	Philip Billard Municipal	TOP
KS	Salina Municipal	SLN
KY	Barkley Regional	PAH
KY	Owensboro/Daviess County	OWB
LA	Acadiana Regional	ARA
LA	Alexandria International (ANG)	AEX
LA	Chennault	CWF
LA	Houma Terreborne	HUM
LA	Shreveport-DT	DTN
MA	Barnes Municipal	BAF
MA	Beverly	BVY
MA	Hyannis	HYA
MA	Lawrence	LWM
MA	Martha's Vineyard	MVY
MA	New Bedford	EWB
MA	Norwood	OWD
MA	Worcester	ORH
MD	Easton	ESN
MD	Frederick	FDK
MD	Martin State	MTN
MD	Salisbury-Wicomico County	SBY
MD	Washington Co. Reg'l/ Hagerstown	HGR
MI	Battle Creek	BTL
MI	Detroit City	DET
MI	Jackson (CS)	JXN
MI	Sawyer Gwinn	SAW
MN	Anoka	ANE
MN	St. Cloud Regional	STC
MO	Branson Airport	BBG
MO	Columbia	COU
MO	Jefferson City Memorial (CS)	JEF
MO	Joplin Regional (CS)	JLN
MO	Rosecrans Mem'l/St. Joseph (ANG)	STJ
MP	Saipan International	GSN
MS	Golden Triangle Regional Airport	GTR
MS	Greenville Municipal	GLH

State	Airport Name	Tower ID
MS	Hawkins Field	HKS
MS	Meridian/Key Field (ANG)	MEI
MS	Olive Branch	OLV
MS	Stennis	HSA
MS	Tupelo Regional	TUP
MT	Gallatin Field/Bozeman	BZN
MT	Kalispell/Glacier Park	GPI
MT	Missoula	MSO
NC	Concord	JQF
NC	Hickory	HKY
NC	Kinston	ISO
NC	New Bern	EWN
NC	Smith Reynolds (Winston Salem)	INT
ND	Minot	MOT
NE	Central Nebraska/Grd Island (CS)	GRI
NH	Boire Field/Nashua	ASH
NH	Lebanon Municipal	LEB
NJ	Trenton	TTN
NM	Double Eagle II	AEG
NM	Farmington Municipal	FMN
NM	Lea County/Hobbs (CS)	HOB
NM	Santa Fe County Municipal	SAF
NV	Henderson	HND
NY	Francis F. Gabreski	FOK
NY	Niagara Falls	IAG
NY	Rome-Griffiss	RME
NY	Stewart	SWF
NY	Tompkins County	ITH
OH	Burke Lakefront	BKL
OH	Cincinnati Muni/Lunken	LUK
OH	Columbus Airport (Bolton Field)	TZR
OH	Cuyahoga County	CGF
OH	Ohio State University	OSU
OK	Ardmore Municipal (CS)	ADM
OK	Enid Woodring Muni	WDG
OK	Lawton Municipal	LAW
OK	Stillwater	SWO
OK	Univ of Oklahoma/Westheimer	OUN
OK	Wiley Post	PWA
OR	Klamath Falls (ANG)	LMT
OR	McNary Field	SLE
OR	Medford	MFR
OR	Pendleton Municipal	PDT
OR	Redmond	RDM
OR	Southwest Oregon Regional	OTH
OR	Troutdale	TTD
PA	Arnold Palmer Regional	LBE
PA	Capital City	CXY

State	Airport Name	Tower ID
PA	Lancaster	LNS
PA	University Park	UNV
PA	Williamsport/Lycoming Co. (CS)	IPT
PR	Isla Grande	SIG
PR	Rafael Hernandez (Aquadilla)	BQN
SC	Donaldson Center	GYH
SC	Grand Strand/Myrtle Beach	CRE
SC	Greenville Downtown	GMU
SC	Hilton Head Airport	HXD
SD	Rapid City Regional	RAP
TN	McKeller-Sipes	MKL
TN	Millington	NQA
TN	Smyrna	MQY
TX	Arlington Municipal	GKY
TX	Brownsville Intl	BRO
TX	Denton Municipal	DTO
TX	Easterwood	CLL
TX	Fort Worth-Spinks (CS)	FWS
TX	Georgetown	GTU
TX	Grand Prairie (CS)	GPM
TX	Laredo Int'l	LRD
TX	Lonestar Executive Airport	CXO
TX	McAllen	MFE
TX	McKinney Municipal	TKI
TX	New Braunfels Municipal	BAZ
TX	Redbird	RBD
TX	Rio Grand Valley (Harlingen)	HRL
TX	San Angelo/Mathis Field	SJT
TX	San Marcos	HYI
TX	(Galveston) Scholes Int'l	GLS
TX	Stinson Municipal	SSF

State	Airport Name	Tower ID
TX	Sugarland	SGR
TX	Tyler	TYR
TX	Victoria	VCT
TX	Waco	CNW
UT	Ogden-Hinckley Municipal	OGD
UT	Provo Municipal	PVU
VA	Charlottesville-Albemarle	CHO
VA	Lynchburg	LYH
VI	Henry E. Rohlsen Airport	STX
WA	Bellingham Intl	BLI
WA	Felts Field	SFF
WA	Olympia	OLM
WA	Renton	RNT
WA	Tacoma Narrows	TIW
WA	Walla Walla Regional (CS)	ALW
WA	Yakima	YKM
WI	Appleton	ATW
WI	Central Wisconsin	CWA
WI	Chippewa Valley (Eau Claire)	EAU
WI	Kenosha Muni	ENW
WI	La Crosse	LSE
WI	Rock County	JVL
WI	Timmerman	MWC
WI	Waukesha County	UES
WI	Wittman Regional	OSH
WV	Greenbrier Valley	LWB
WV	Morgantown	MGW
WV	Parkersburg/Wood County	PKB
WV	Wheeling Ohio County	HLG
WY	Cheyenne (ANG)	CYS
WY	Jackson Hole	JAC

ANG: Air National Guard Tower; CS: Cost-Share Tower
Source: FAA

EXHIBIT C. LIST OF 92 COMPARABLE FAA TOWERS

State	Tower Name	Tower ID	State	Tower Name	Tower ID
AK	Juneau Tower	JNU	IL	Aurora Tower	ARR
AK	Merrill Tower	MRI	IL	Chicago Executive Tower	PWK
AZ	Falcon Tower	FFZ	IL	Downtown Tower	CPS
AZ	Grand Canyon Tower	GCN	IL	Dupage Tower	DPA
AZ	Prescott Tower	PRC	IN	Lafayette Tower	LAF
AZ	Scottsdale Tower	SDL	KY	Bowman Tower	LOU
CA	Brackett Tower	POC	LA	Lakefront Tower	NEW
CA	Burbank Tower	BUR	MA	Hanscom Tower	BED
CA	Camarillo Tower	CMA	MA	Nantucket Tower	ACK
CA	Chino Tower	CNO	MD	Andrews Tower	ADW
CA	Concord Tower	CCR	MI	Ann Arbor Tower	ARB
CA	El Monte Tower	EMT	MI	Pontiac Tower	PTK
CA	Gillespie Tower	SEE	MI	Traverse City Tower	TVC
CA	Hayward Tower	HWD	MI	Willow Run Tower	YIP
CA	Livermore Tower	LVK	MN	Crystal Tower	MIC
CA	Monterey Tower	MRY	MN	Flying Cloud Tower	FCM
CA	Montgomery Tower	MYF	MN	St Paul Tower	STP
CA	Napa Tower	APC	MO	Downtown Tower	MKC
CA	Ontario Tower	ONT	MO	Helena Tower	HLN
CA	Palm Springs Tower	PSP	MO	Spirit Tower	SUS
CA	Palo Alto Tower	PAO	ND	Grand Forks Tower	GFK
CA	Palomar Tower	CRQ	NE	Eppley Tower	OMA
CA	Reid-Hillview Tower	RHV	NE	Lincoln Tower	LNK
CA	Sacramento Tower	SMF	NH	Manchester Tower	MHT
CA	San Diego Tower	SAN	NJ	Caldwell Tower	CDW
CA	San Jose Tower	SJC	NJ	Morristown Tower	MMU
CA	Santa Monica Tower	SMO	NJ	Teterboro Tower	TEB
CA	Sonoma Tower	STS	NV	North Las Vegas Tower	VGT
CA	Stockton Tower	SCK	NY	Farmingdale Tower	FRG
CA	Torrance Tower	TOA	NY	Islip Tower	ISP
CO	Broomfield Tower	BJC	NY	Poughkeepsie Tower	POU
CO	Pueblo Tower	PUB	NY	Westchester Tower	HPN
CT	Bradley Tower	BDL	OR	Hillsboro Tower	HIO
DE	Wilmington Tower	ILG	PA	Allegheny Tower	AGC
FL	Fort Lauderdale Executive Tower	FXE	PA	Northeast Philadelphia Tower	PNE
FL	Orlando Executive Tower	ORL	PR	San Juan Tower	SJU
FL	Pensacola Tower	PNS	TX	Addison Tower	ADS
FL	Sarasota Tower	SRQ	TX	Alliance Tower	AFW
FL	St Lucie Tower	FPR	TX	Beaumont Tower	BPT
FL	St Petersburg Tower	PIE	TX	Hooks Tower	DWH
FL	Tamiami Tower	TMB	TX	Meacham Tower	FTW
FL	Vero Beach Tower	VRB	VA	Manassas Tower	HEF
GA	Columbus Tower	CSG	VA	Patrick Henry Tower	PHF
GA	DeKalb - Peachtree Tower	PDK	VA	Richmond Tower	RIC
HI	Maui Tower	OGG	VI	St Thomas Tower	STT
ID	Twin Falls Tower	TWF	WA	Paine Tower	PAE

This list was provided by FAA for comparison purposes only. Currently FAA has no plans to expand the Contract Tower Program to additional FAA-operated towers.

Source: FAA