



Buffalo Niagara International Airport  
Airline Competition Plan  
Fiscal year 2017



Buffalo Niagara International Airport  
4200 Genesee Street  
Buffalo, New York 14225

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## Exhibits

“Exhibit 1”	Terminal Diagram
“Exhibit 2”	Gate Use Permit
“Exhibit 3”	Gate Schedule Sample
“Exhibit 4”	Gate Utilization
“Exhibit 5”	Lease and Use Agreement (original, 1st, 2nd, and 3rd amendments)

# Introduction

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The Wendell H. Ford Aviation Investment and Reform Act for the 21<sup>st</sup> Century (AIR-21), requires certain large and medium hub airports to prepare and submit an Airline Competition Plan to the FAA. The airports that are required to prepare and submit an Airline Competition Plan (“covered airports”) are medium and large hub airports at which one or two airlines control more than fifty percent of annual passenger enplanements. Covered airports must submit an Airline Competition Plan before a new Passenger Facility Charge (PFC) will be approved for collections, or a new grant will be issued under the Airport Improvement Program (AIP) beginning in Federal fiscal year (FFY) 2001.

The statute also provides for the periodic review of Airline Competition Plans for PFC purposes, and the FAA needs updated plans for action on subsequent PFC applications. In addition, the FAA must have a current Competition Plan to issue each AIP grant (the FAA will consider a Competition Plan or an update to be current for an entire FFY).

Buffalo Niagara International Airport (BUF or Airport) is owned and operated by the Niagara Frontier Transportation Authority (Authority), a public benefit corporation created by the State of New York. In Calendar Year (CY) 2015, BUF accounted for .29 percent of U.S. enplaned passengers, based on passenger enplanement data from the Department of Transportation (DOT) Air Carrier Activity database. Southwest Airlines (Southwest) and Delta Air Lines (Delta) collectively accounted for 56.7 percent of enplaned passengers at the Airport in CY 2015. The remaining 43.3 percent of enplaned passengers are a combination of American Airlines (American), JetBlue Airways (JetBlue), United Airlines (United), and Sunwing Airlines (Sunwing). As a result, an Airline Competition Plan is required to be filed in FFY 2017 in order for a new PFC to be approved for collection, or a grant to be issued under AIP.

**Table 1**  
CY2015 BUF Enplanements

Airline	Enplanements	Percentage of Enplanements
Southwest	807,704	34.5%
Delta	519,103	22.2%
Other	1,013,987	43.3%
Total	2,340,794	100.0%

## Section A. Availability of Gates

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### a.1 Number of available gates.

Buffalo Niagara International Airport provides a total of twenty-three gates with loading bridges and two ground-loaded gates. Sixteen gates with loading bridges are under signatory lease to airlines on a preferential-use basis. Seven gates with loading bridges and two ground-loaded gates are available for lease and are currently used by tenant air carriers and transient air carriers on a per use basis. Two of the unleased gates are configured for international service and are made available on a preferential basis for this class of service. These two gates are available, however, for domestic use when not needed for international arrivals/departures.

**Table 2**

Allocation of Gates

Airline	Number of Preferential-Use Gates Leased	Authority Controlled Gates	Gate Numbers
Authority Controlled Gates		9	1, 2, 2A, 9, 11, 19, 21, 24, 26
American	4		3, 4, 5, 6
JetBlue	2		7, 8
United	3		10, 12, 14
Southwest	3		15, 16, 18
Delta	4		20, 22, 23, 25
<b>Totals</b>	<b>16</b>	<b>9</b>	<b>25 gates</b>

### a.2 Have carriers been serving the airport for more than three years relying on common-use gates?

Gates at the Airport are available for lease from the Authority on a preferential-use basis only. Gates which are not currently under lease to specific airlines, are available on a per use basis and the use of these gates is controlled and monitored by the Airport to ensure non-discriminatory access to gates for based and itinerant airlines. While some airlines regularly use the same Authority controlled gates to supplement their daily flights schedules, any airline wishing to lease one of these gates under signatory status would be given preference to do so. The Airport reserves the right to reassign use of a gate if any conflicts exist or if parking restraints will be affected.

**a.3 Diagram of Airport Concourse.**

See **Exhibit 1**

**a.4 Gate use monitoring policy.**

Any airline that desires permission to operate scheduled passenger service flights or passenger charter flights out of the Airport using Authority Controlled Gates must complete, sign and return a Gate Use Permit (“Permit”) (see **Exhibit 2**) to the Authority prior to commencing such flights. The Permit is valid on a month to month basis and may be cancelled by either party on 30-day notice. As a condition of the Permit, an airline must comply with all of the requirements contained in Exhibit A of the Permit “Operating Procedures For Use of Authority Controlled Gates”. Once the permit is signed by the airline, the airline will have the non-exclusive right to use Authority Controlled Gates, provided the airline has properly scheduled the flights with Airport administration. Airlines must submit a flight schedule monthly, 15 days in advance, to the Airport Administration Office for approval prior to the operation of flights at Authority Controlled Gates. Charter flights or additions to a monthly schedule must be received and approved by Airport Administration no later than 48 hours before the flight(s).

See **Exhibit 3** for a sample Gate Schedule.

**a.5 Process for accommodating new service and for service by a new entrant.**

An existing airline leasing a preferential-use gate has the right to add new scheduled service to its preferential-use gate at any time. New entrant airlines need to lease an Authority Controlled Gate for its service under a signatory lease or may execute a Permit to operate its flights using an Authority Controlled Gate subject to per-use fees set by Authority tariff. The Airport currently has available ticketing space and operations space available to accommodate new entrant airlines. Under the terms of the Authority’s Airport Use and Lease Agreement (“AULA”), the Airport has the right to require existing airlines to share certain areas of airline operations space, for example, baggage make-up space and equipment, under the joint-use provision of the AULA.

**a.6 Description of any instances in which the Passenger Facility Charge competitive assurance #7 operated to convert previously exclusive use gates to preferential-use gates or it caused such gates to become available to other users.**

All gates at the airport are preferential-use gates and have been since the construction of a new 15 gate passenger terminal in 1997. The Airport passenger terminal was expanded twice subsequent to its 1997 completion. The first expansion was completed in 1999 with the addition of two international gates with passenger loading bridges and full Federal Inspection Services facilities to accommodate international flights. The second expansion opened in 2000 with the addition of seven loading bridge gates and one ground loaded gate to accommodate new entrant carriers JetBlue Airlines and Southwest Airlines.

**a.7 Gate Utilization (departures/gate) per week and month reported for each gate.**

See “Gate Utilization – Departures per Gate per Month and per Week” attached hereto as “**Exhibit 4**”.

**a.8 Describe the circumstances of accommodating a new entrant or expansion of service during the 12 months preceding filing, including the length of time between the initial carrier contact of the airport and start of service, the identity of the carriers and how they were accommodated.**

In January 2015, Sunwing Airlines began operating seasonal service to Punta Cana, Dominican Republic and Cancun, Mexico with weekly flights from January through April. Sunwing chose to operate under a Gate Use Permit to use an international gate on a per use basis rather than entering into a signatory lease arrangement with the Airport. The airline operated a similar flight schedule during 2016 and is currently operating a similar schedule in 2017.

In June 2016, JetBlue Airways commenced daily nonstop service from the Airport to Los Angeles International Airport, a destination not previously served with nonstop service. JetBlue Airways was able operate flights using gates they currently lease from the Airport on a preferential-use basis.

Sunwing and JetBlue participated in the NFTA’s BUF new carrier and new destination Incentive Program. The new entrant service and new destination service were the result of direct marketing efforts on the part of the Airport. The Airport’s Incentive Program can be found at [www.buffaloairport.com/about/business.aspx](http://www.buffaloairport.com/about/business.aspx).

Southwest Airlines commenced new weekly nonstop service to Denver International Airport in June 2016 using a gate they currently lease from the Airport on a preferential-use basis. The Denver service was operated on a trial basis and ended in August 2016.

No other markets were added during the year.

No other markets were dropped during 2016.

**a.9 Resolution of any access complaints by a new entrant or an air carrier seeking to expand service during the 12 months preceding the filing, including a description of the process to resolve the complaint.**

The Airport has not denied access to any carrier since the opening of the terminal in 1997, nor have there been any access complaints filed during this time.

**a.10 Describe use/lose, or use/share policies and recapture policies for gates and other facilities. If no such policies exist, explain the role, if any, that underutilized gates play in accommodating requests for gates.**

There are currently gates available for new entrants and existing carriers who may want to expand service at the Airport. AULA contains an efficient use clause that may be invoked in the event gates are not available that grants the Authority the right to require signatory airlines to accommodate new entrants or the expansion of service from an existing air carrier. (See Section 6A of AULA).

**a.11 Plans to make gates and related facilities available to new entrants or to air carriers that want to expand service at the airport and methods of accommodating new gate demand by air carriers at the airport (common-use, preferential-use, or exclusive use gates).**

There are currently gates available for new entrants and existing carriers who may want to expand service at the Airport. AULA contains an efficient use clause that may be invoked in the event gates are not available that grants the Authority the right to require signatory airlines to accommodate new entrants or the expansion of service from an existing air carrier. (See Section 6A of AULA).

**a.12 Availability of an airport competitive liaison to assist carriers, including new entrants.**

The Airport's Administrative Office actively assists both existing and new entrant carriers in gaining access to the facilities required for their operations.

**a.13 Number of aircraft remain overnight (RON) positions available at the airport by lease arrangement, i.e. exclusive use, preferential-use, common-use or unassigned, and distribution by carrier. This should include a description of the procedures for monitoring and assigning RON positions and for communicating availability of RON positions to users.**

The Airport currently allows carriers to utilize 9 Authority Controlled Gates as RON positions. In addition, the Airport has 8 dedicated hard stand RON positions. All RON positions at the Airport are common-use. Requests for RON parking positions are processed through the Airport Administration Office. Parking positions are currently not assigned and are available on a first come, first serve basis. The airlines currently utilize RON positions that are close in proximity to their preferentially-leased gates. To date, there have been no disputes regarding specific assignment of RON positions that required mediation/resolution by the Airport.

## **B. Leasing and Subleasing**

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**b.1 Is a subleasing or handling arrangements with an incumbent carrier necessary to obtain access?**

No, there are currently ticket counter, gate and other facilities available to new entrant carriers.

**b.2 How the airport assists requesting airlines to obtain a sublease or handling arrangement.**

The Airport has not received any requests to sublease gate, ticket counter or operations space. Additionally, the Airport has approved multiple ground handling companies to operate at the Airport which provide a competitive environment for the provision of such services.

**b.3 Airport policies for sublease fee levels (e.g., maximum 15 percent above lease rates), and for oversight of fees, ground/handling arrangements and incumbent schedule adjustments that could affect access to subtenants.**

The Airport's policy regarding sublease fee levels is included in the AULA. The AULA provides that the sublease/shared use fee is limited to the total cost of providing and maintaining the space and facilities, plus an administrative surcharge not to exceed 15%, allocated among the total number of uses of the space. (See Section 6B of AULA). The Airport has several gates that are currently available to accommodate requests for gate space from existing tenants and for new entrant carriers.

**b.4 Process by which availability of facilities for sublease or sharing is communicated to other interested carriers and procedures by which sublease or sharing arrangements are processed.**

The Authority has not received requests by airlines to assist in securing a sublease. However, an airline must obtain the Authority's written consent prior to finalizing a sublease agreement. The sublease or other document must be in a form consistent with the terms and conditions of the AULA and must be submitted to and approved in writing by the Authority.

**b.5 Procedures for resolving disputes or complaints among carriers regarding use of airport facilities, including complaints by subtenants about excessive sublease fees or unnecessary bundling of services.**

The Airport has not received any complaints, nor is the Airport aware of any disputes or complaints regarding excessive sublease fees (currently there are no sublease arrangements at the Airport) or unnecessary bundling of fees at the Airport. Language in the AULA limits the fees and provides the Authority with rights to resolve these types of disputes.



**b.6 Resolution of any disputes over subleasing arrangements in the past 12 months preceding filing.**

Not applicable since there were no subleases during the past twelve months.

**b.7 Accommodation of independent ground service support contractors, including ground handling, maintenance, fueling, catering or other support services.**

In addition to the FBO, the Airport has authorized 3 ground service support contractors, 2 maintenance contractors and 1 deicing contractors to provide services at the Airport. All licensed ground service support contractors at BUF may provide ground handling, maintenance, deicing and other support services. Fueling can be provided by the individual airline for its own operation or by the Airport's FBO. Any airline, existing or new entrant may become a member of the Airport's fuel farm. Membership in the fuel farm allows airlines to have fuel delivered to the Airport's fuel storage facilities and such inventory of fuel may be used in the airlines operations via self-fueling or through a fueling arrangement with the FBO.

**b.8 Copies of lease and use agreements in effect at the airport.**

See **Exhibit 5** for a copy of the Authority's AULA and see **Exhibit 2** for a copy of the Airport's Gate Use Permit. Note, due to volume, only one complete copy of the AULA is attached with a list of signatory carriers and one complete copy of the Airport's Gate Use Permit is also attached. The AULA contains standard language and the exhibits depict the leased premises of each carrier and the Airport's Gate Use Permit is also a standard agreement.

## **C. Gate Use Requirements**

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**c.1 Gate use monitoring policy, including schedules for monitoring, basis for monitoring activity (i.e., airline schedules, flight information display systems, etc.), and the process for distributing the product to interested carriers.**

The Authority's gate use monitoring policy is described in Section a.4 above. Any interested carrier may contact the Airport Administrative Office for information regarding gate availability and specific time slots.

**c.2 Requirements for signatory status and identity of signatory carriers.**

All commercial service passenger airlines who are federally certificated air carriers and who wish to engage in an air transportation business at the Airport must enter into an AULA, which is the Authority's signatory agreement. The Airport's signatory carriers are American Airlines, Delta Air Lines, JetBlue Airways, Southwest Airlines, and United Airlines.

**c.3 Where applicable, minimum use requirements for leases (i.e., frequency of operations, number of seats, etc.).**

The Airport does not have a policy regarding minimum use requirements for leases. In accordance with the terms and conditions of the AULA, the Airport reserves the right to require any signatory airline(s) to adjust its lease premises to permit the Authority to assure the most efficient use of the terminal building and gates. Initial assignment of a gate under the AULA for a new entrant would take into consideration the carrier's proposed operations including, but not limited to the type of aircraft, carrier schedule, and ground handling requirements.

**c.4 The priorities, if any, employed to determine carriers that will be accommodated through forced sharing or sub-leasing arrangements. Describe how these priorities are communicated to interested carriers.**

The Airport does not have any instances of forced subleasing at the Airport.

**c.5 Justifications for any differences in gate use requirements among tenants.**

All gates preferential-use under the AULA. There are no differences in gate use requirements among tenants.

**c.6 Usage policies for common-use gates, including, where applicable, a description of priorities for use of common-use gates. Explain how these priorities are communicated to interested carriers.**

Gates 1 and 2 are common-use gates and are the only gates designated as international gates. Both gates are available for domestic flights when not reserved for international flights. These gates are assigned on a first come first served basis with international reservations taking priority. Additionally, there are 7 Authority Controlled Gates that have not been leased which are currently being utilized as common-use gates. The Authority ensures through its Gate Use Procedures that carriers cannot over schedule a common-use gate.

**c.7 Methods for calculating rental rates or fees for leased and common-use space. Where applicable, provide an explanation of the basis for disparities in rental rates for common-use versus leased gates.**

Rental rates for leased space are set annually, on a compensatory basis, as defined in the AULA. Common-use gate fees are fixed fees defined in BUF's Tariff which incorporates the Authority's operating and carrying costs associated with the common-use gates, ticket counters and ramp. The Authority tries to maintain a level playing field between signatory carriers and gate use carriers. It is more expensive, depending on the number flights, to operate on a per use basis.

## D. Gate Assignment Policy

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**d.1 Gate assignment policy and method of informing existing carriers and new entrants of this policy. This would include standards and guidelines for gate usage and leasing, such as security deposits, minimum usage, if any, terms, master agreements, signatory, and non-signatory requirements.**

The gate assignment policy is addressed in Section 6 of the Authority's AULA, attached as **Exhibit 5**. This policy applies to all commercial scheduled service airlines that, by executing and being party to an AULA, become a signatory carrier to the Airport. Commercial service airlines that seek to operate scheduled or nonscheduled service at the Airport, but do not wish to become a signatory carrier, must execute a Gate Use Permit with the Airport prior to commencing service at the Airport.

Preferential-use gates are assigned to airlines by the Authority and are shown in **Table 2** above. In accordance with the terms and conditions of the AULA, the Airport reserves the right to require any signatory airline(s) to adjust its lease premises to permit the Authority to assure the most efficient use of the terminal building and gates.

**d.2 Methods for announcing to tenant carriers when gates become available. The description should discuss whether all tenant air carriers receive information on gate availability and terms and conditions by the same process at the same time.**

Currently, there is no formal process outlined in the AULA for announcing gate availability. However, the Airport holds monthly tenant meetings, including representatives from the signatory airlines. This provides a forum for Airport representatives to inform all tenants about new entrant carriers and seasonal flight schedule adjustments. Additionally, all gate use activity at Authority Controlled Gates is monitored and assigned by the Airport administration office and the schedule is distributed monthly to the tenant air carrier station managers in advance of the flight operations. The Authority also conducts an annual rates and charges meeting with the corporate representatives of the carriers.

**d.3 Methods of announcing to non-tenant carriers, including both those operating at the airport and those that have expressed an interest in initiating service, when gates become available; and policies on assigning RON positions and how RON position availability announcements are made.**

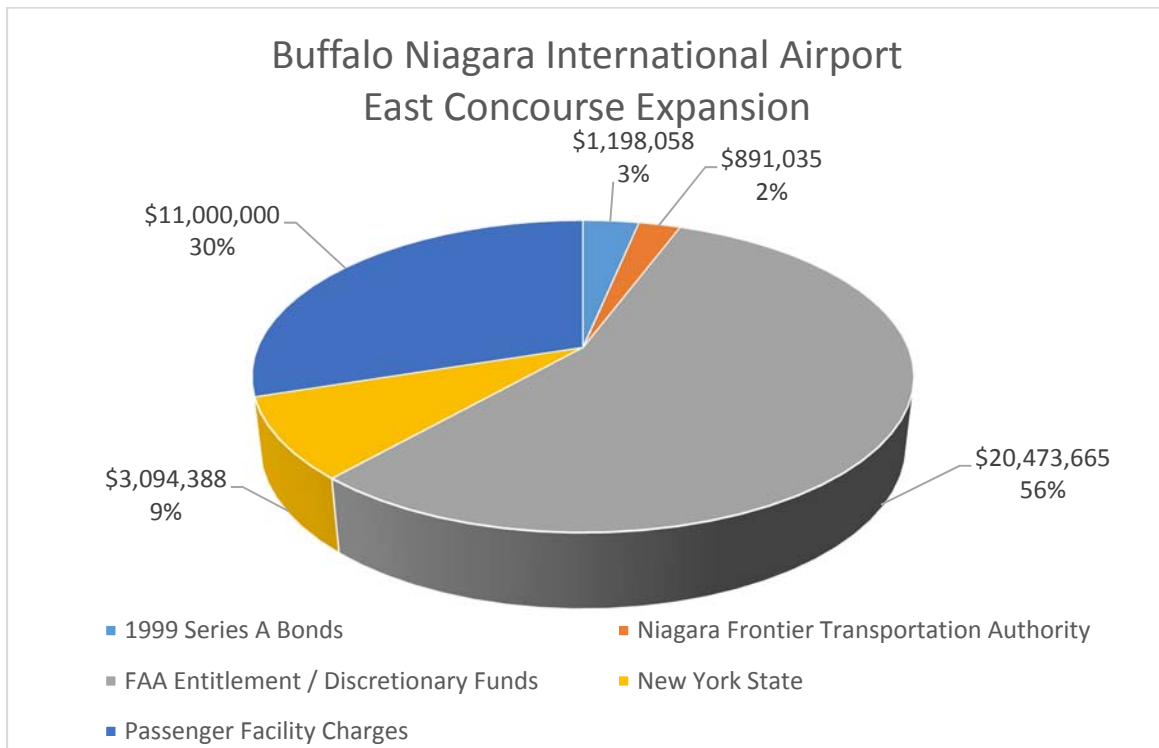
There is currently no formal process to announce to non-tenant carriers when gates become available, however, an Airport Map is available on the Airport's website ([www.buffaloairport.com/Guide/Terminal.aspx](http://www.buffaloairport.com/Guide/Terminal.aspx)) that clearly identifies Airport Controlled Gates and the positions and air carrier names of gates currently under lease with the Authority.

As stated in the Airport’s Tariff, which is available on the Airport’s website ([www.buffaloairport.com/pdfs/tariff.pdf](http://www.buffaloairport.com/pdfs/tariff.pdf)), overnight parking areas are designated by the Airport Director. Individual overnight parking spaces are not specifically assigned to air carriers, but rather are available on a first come, first served basis. In general, the Airport has ample RON space available to accommodate more than the current demand. RON spaces are in close proximity to the terminal. The Airport has not received any complaints, nor is the Airport aware of any disputes or complaints regarding the use and/or allocation of individual RON spaces.

## E. Financial Constraints

### e.1 The major sources of revenues for terminal projects.

The Authority’s major sources of revenues for terminal projects typically consist of bond financing, PFCs, AIP Grants, if available, and Authority funds. An example of the funding sources for the Airport’s most recent gate expansion project is set forth below. A seven (7) gate expansion to the East Concourse including apron and parking accommodations, as well as the addition of other passenger processing facilities was opened in 2000 to meet airline demand and future growth.



## **e.2 Rates and charges methodology.**

The Authority uses a cost compensatory methodology whereby landing fees and terminal rental rates are based upon airline reimbursement of their proportionate share of combined operating expenses, unfunded capital, and bond debt service requirements.

## **e.3 Past use of PFCs for gate and related terminal projects.**

The following gate and terminal related projects have been funded with PFCs:

- PFC #1 –PFC funding was used to partially fund the original construction and bond debt service requirements of a new 398,000 square feet terminal building with 15 gates and subsequent 2 gate expansion completed in year 1999.
- PFC #6 – addition of 47,000 square feet expansion for a baggage handling system with related equipment, additional passenger movement areas, pedestrian walkways, and re-location of security checkpoint completed in year 2009 together with partial bond debt service related to the 7-gate expansion project identified in section 6.1.
- PFC #7 – Concourse level modifications completed in years 2009 and 2010.
- PFC #8 – Improvement of passenger terminal access including replacement of revolving doors for entry/exit for terminal patrons.
- PFC #10 – Terminal restroom upgrades were completed in year 2014.
- PFC #11- Replacement of passenger jet bridge, enhancement of security access equipment, and replacement of fire alarm system completed in year 2015.
- PFC #13 – ongoing projects related to design costs for an upcoming baggage claim and passenger movement expansion project planned for years 2018 and 2019, replacement of a public-address system with improvements for the visually/hearing impaired, and replacement of the terminal roof which has exceeded its useful life.

## **e.4 Availability of discretionary income for airport capital improvement projects.**

The Authority’s capital plan encompasses many projects defined in the recently issued Master Plan as well as major improvements related to the 20-year old terminal building to accommodate future growth requirements. AIP discretionary funds are limited and PFC funds, at its current \$4.50 collection limit, are not adequate to fully fund future capital projects.

# **F. Airport Controls Over Capacity**

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## **f.1 Majority-in-Interest (“MII”) or “no further rates and charges” clauses covering groundside and airside projects.**

The Authority’s Airline Use and Lease Agreement does not contain any MII provisions.

**f.2 Any capital construction projects that have been delayed or prevented because a MII was invoked.**

The Authority's Airline Use and Lease Agreement does not contain any MII provisions.

**f.3 Plans, if any, to modify existing MII agreements.**

The Authority does not plan to add any MII provision to the next Airline Use and Lease Agreement.

## **G. Common-Use Gates**

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**g.1 The number of common-use gates that the Airport plans to build or acquire and the timeline for completing the process of acquisition or construction. Indicate the intended financing arrangements for these common-use gates, and whether the gates will be constructed in conjunction with preferential-use or exclusive use gates.**

The Airport does not currently have plans to construct additional gates and does not foresee acquiring gates through carrier give backs.

**g.2 Whether common-use gates will be constructed in conjunction with gates leased through exclusive use or preferential-use arrangements.**

The Airport does not currently have plans to construct additional gates and does not foresee acquiring gates through carrier give backs.

**g.3 Whether gates being used for international service are available for domestic service.**

The Airport has two gates, Gate 1 and Gate 2, which are designed to accommodate both international and domestic flights. These two gates are not in a segregated area of the terminal. U.S. Customs and Border Protection (CBP) facilities to process arriving international passengers are located a floor below the passenger hold rooms of Gates 1 and 2. CBP facilities are physically secured to prevent unauthorized access during the operation of domestic flights at Gates 1 and 2.

**g.4 Whether air carriers that only serve domestic markets operate from international gates. If so, describe and explain any disparity in their terminal rentals versus domestic terminal rentals.**

Air carriers that only serve domestic markets may operate domestic flights from the Gates 1 and 2 on a per use basis. International flights operating at the airport are charged a higher rate than domestic flights to reflect the use of more airport space (related to the use for CBP facilities) than domestic flights require and international garbage charges that the Authority incurs. The per gate use rates for both domestic and international flights are available on the Airport's website at [www.buffaloairport.com/pdfs/tariff.pdf](http://www.buffaloairport.com/pdfs/tariff.pdf).

## H. Public Access to Competition Plan

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**h.1** The Initial Competition Plan for Buffalo Niagara International Airport can be found on the Niagara Frontier Transportation Authority’s “Public Information” section of their website at <http://www.nfta.com/About/PublicInfo.aspx>.

## I. Patterns of Air Service

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**i.1 Number of markets served and identities of carriers serving the Airport.**

23 markets served by 6 carriers.

**Markets Served:**

1	Atlanta	ATL
2	Baltimore	BWI
3	Boston	BOS
4	Cancun, MX	CUN
5	Charlotte	CLT
6	Chicago - Midway	MDW
7	Chicago - O'Hare	ORD
8	Detroit	DTW
9	Fort Lauderdale	FLL
10	Fort Myers	RSW
11	Las Vegas	LAS
12	Los Angeles - LAX	LAX
13	Minneapolis-St. Paul	MSP
14	New York - JFK	JFK
15	New York - LaGuardia	LGA
16	New York - Newark	EWR
17	Orlando	MCO
18	Philadelphia	PHL
19	Phoenix	PHX
20	Punta Cana, DR	PUJ
21	Tampa	TPA
22	Washington - Dulles	IAD
23	Washington - Reagan	DCA

**Carriers:**

American	Southwest
Delta	United
JetBlue	Sunwing

**i.2 Number of markets served on a non-stop basis and the average number of daily flights.**

21 non-stop markets served daily.

	<b><u>Non-Stop Market</u></b>		<b><u>Airline</u></b>	<b><u>Avg. Daily Flights</u></b>
1	Boston	BOS	American	1.45
	Boston	BOS	JetBlue	3.55
2	Charlotte	CLT	American	3.18
3	Chicago - O'Hare	ORD	American	3.82
	Chicago - O'Hare	ORD	United	3.00
4	Philadelphia	PHL	American	5.45
5	Washington - Reagan	DCA	American	2.00
6	Fort Lauderdale	FLL	JetBlue	1.00
	Fort Lauderdale	FLL	Southwest	2.36
7	Los Angeles - LAX	LAX	JetBlue	1.00
8	New York - JFK	JFK	JetBlue	5.27
	New York - JFK	JFK	Delta	4.82
9	Orlando	MCO	JetBlue	1.00
	Orlando	MCO	Southwest	6.36
10	New York - Newark	EWR	United	3.64
11	Washington - Dulles	IAD	United	1.00
12	Baltimore	BWI	Southwest	4.64
13	Chicago - Midway	MDW	Southwest	2.00
14	Fort Myers	RSW	Southwest	2.00
15	Las Vegas	LAS	Southwest	2.00
16	Phoenix	PHX	Southwest	1.00
17	Tampa	TPA	Southwest	2.55
18	Atlanta	ATL	Delta	4.82
19	New York - LaGuardia	LGA	Delta	4.27
20	Detroit	DTW	Delta	4.82
21	Minneapolis-St. Paul	MSP	Delta	1.00



2 non-stop seasonal markets served weekly.

	<u>Non-Stop Market</u>		<u>Airline</u>
1	Cancun, MX	CUN	Sunwing
2	Punta Cana, DR	PUJ	Sunwing

**i.3 Number of small communities served.**

None.

**i.4 Number of markets served by low-fare carriers.**

13 markets are served by 2 low-fare carriers.

**JetBlue**

1	Boston	BOS
2	Fort Lauderdale	FLL
3	Los Angeles - LAX	LAX
4	New York - JFK	JFK
5	Orlando	MCO

**Southwest**

6	Baltimore	BWI
7	Chicago-Midway	MDW
8	Fort Lauderdale	FLL
9	Fort Myers	RSW
10	Las Vegas	LAS
11	Orlando	MCO
12	Phoenix	PHX
13	Tampa	TPA

**i.5 Number of markets served by one carrier.**

18 markets are served by one carrier.

	<b><u>Market</u></b>		<b><u>Airline</u></b>
1	Charlotte	CLT	American
2	Philadelphia	PHL	American
3	Washington-Reagan	DCA	American
4	Los Angeles - LAX	LAX	JetBlue
5	New York - Newark	EWR	United
6	Washington - Dulles	IAD	United
7	Baltimore	BWI	Southwest
8	Chicago - Midway	MDW	Southwest
9	Fort Myers	RSW	Southwest
10	Las Vegas	LAS	Southwest
11	Phoenix	PHX	Southwest
12	Tampa	TPA	Southwest
13	Atlanta	ATL	Delta
14	New York-LaGuardia	LGA	Delta
15	Detroit	DTW	Delta
16	Minneapolis-St. Paul	MSP	Delta
17	Cancun, MX	CUN	Sunwing
18	Punta Cana, DR	PUJ	Sunwing

**i.6 Number of new markets added or previously served markets dropped in the past year.**

In June 2016, JetBlue commenced daily nonstop service from Buffalo to Los Angeles International Airport. Southwest conducted new once weekly nonstop service to Denver International Airport in June 2016. The Denver service was operated on a trial basis and ended in August 2016.

No other markets were added during the year.

No other markets were dropped during 2016.