



Rowan County  
Mid-Carolina Regional Airport  
3670 Airport Loop  
Salisbury, North Carolina 28147  
704.216.7749

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# Stakeholder Comment Compilation and Response

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Rowan County

*Mid-Carolina Regional Airport (RUQ)*

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March 6, 2023

Rowan County (County) believes updating and implementing new General Aviation Minimum Standards (Minimum Standards) and Rules and Regulations are: (1) consistent with Federal Aviation Administration (FAA) policies and directives, (2) consistent with best management practices, and (3) necessary to ensure the successful planning, development, operation, and management of activities at Mid Carolina Regional Airport (Airport).

By way of background, when an airport sponsor (in this case, the County) obtains a grant for airport improvements under the FAA Airport Improvement Program, the airport sponsor is required to give certain assurances to the FAA known as the Airport Sponsor Assurances. Airport Sponsor Assurance #22, Economic Nondiscrimination, states *“The sponsor may establish such reasonable, and not unjustly discriminatory, conditions to be met by all users of the airport as may be necessary for the safe and efficient operation of the airport.”*

Order 5190.6B Airport Compliance Manual states that *“Grant Assurance [Airport Sponsor Assurance] 19, Operations and Maintenance, requires the sponsor to protect the public using the airport by adopting and enforcing rules, regulations, and ordinances as necessary to ensure safe and efficient flight operations.”* Order 5190.6B further states that *“One of the most important functions of local regulations is to control the use of the airport in a manner that will eliminate hazards to aircraft and people and structures on the ground.”*

In the Airport Sponsor Assurances, the FAA identifies a number of Advisory Circulars (AC) that, when attached to or incorporated by reference into the grant agreement, become mandatory contractual obligations of the airport sponsor. In AC 150/5190-7, Minimum Standards for Commercial Aeronautical Activities, the FAA highly recommends the *“use and implementation”* of minimum standards *“as a means to minimize the potential for violations of federal obligations at federally obligated airports.”* The AC states that *“The FAA objective in recommending the development of minimum standards serves to promote safety in all airport activities, protect airport users from unlicensed and unauthorized products and services, maintain and enhance the availability of adequate services for all airport users, promote the orderly development of airport land, and ensure efficiency of operations.”* The AC also suggests that *“airport sponsor establish reasonable minimum standards that are relevant to the proposed aeronautical activity with the goal of protecting the level and quality of services offered to the public.”*

It is significant to note the AC also states *“The airport sponsor’s purpose in imposing standards is to ensure a safe, efficient and adequate level of operations and services is offered to the public”* and the standards should be *“relevant to the proposed aeronautical activity with the goal of protecting the level and quality of services offered to the public.”* The FAA specifically indicates, in multiple instances throughout the AC that an airport sponsor should develop minimum standards to address the level and quality of general aviation aeronautical services provided at an airport.

Several documents provide the foundation for the development and implementation of Minimum Standards including: the Airport Sponsor Assurances, AC 150-5190-6 Exclusive Rights at Federally-Obligated Airports, AC 150/5190-7 Minimum Standards for Commercial Aeronautical Activities, and Order 5190.6B Airport Compliance Manual. All interested parties are encouraged to thoroughly review and carefully consider each of these documents and to view these Minimum Standards in totality.

Within this context, it is the desire of the County to: (1) ensure the products, services, and facilities desired by aviation consumers are consistently provided at the Airport in a safe, secure, efficient, prompt, and professional manner, (2) ensure the safe, orderly, and efficient operation and use of the Airport, (3) protect the public health, safety, interest, and general welfare of the Operators, Lessees, Sublessees, Permittees, and users of the Airport, and (4) create a level playing field (for Operators) and promote fair competition (between Operators).

As such, the County and AMCG have prepared draft Minimum Standards and Rules and Regulations that are: (1) relevant to the current (and/or anticipated) general aviation activities at the Airport, (2) reasonable and appropriate for the Airport and the market, (3) necessary to meet the type and level of demand that exists (and/or is anticipated) at the Airport and in the market, and (4) protects the public health, safety, interest, and general welfare of all users of the Airport.

During the document development process, AMCG gathered and considered relevant information from: (1) current operators at the Airport and (2) airports considered comparable to the subject airport. In addition, AMCG and the County viewed Minimum Standards from a consumer perspective.

The draft Minimum Standards and Rules and Regulations were made available for public review and comment from November 28, 2022 – December 28, 2022. The following is a compilation of comments received regarding the draft Minimum Standards and Rules and Regulations (both dated November 28, 2022) with the County’s response to each comment received as of January 31, 2023.

In some cases, the comments received have been paraphrased and/or summarized based on verbal discussions with stakeholders. Each of the comments submitted has been addressed in this document and/or in the revised draft Minimum Standards or Rules and Regulations. Each comment is represented by a “C” and the response to the comment is represented by an “R”. The numbering is utilized only as a method to identify and organize comments.

Also, if a comment requested to delete specific language from the draft documents, that language has been identified using ~~striketrough~~ and when a respondent has requested to add language, that language has been identified using **red** highlight. Any language identified in *italics* is taken verbatim from the draft documents.

The County wishes to thank each individual that took the time to review the draft documents and for providing comments on this important document.

### **General Comments**

<b>C1</b>	I do not see anything regarding selling of Leased Premises (hangars). I understand the County sold the hangars originally to fund the Airport project and the hangars are personally or commercially owned and the land is leased from the County, but I think it would benefit the County if they were given first right to buy back the property (hangar). OR at the very least a public notice for a limited amount of time (determined by the County) has to be posted to prevent a monopoly ownership who could feel they have majority interest in the Airport and therefore at some point, hinder the effectiveness of the Airport Director and/or Airport staff or even the County.
<b>R1</b>	<p>Limiting the number of hangars certain entities can lease or occupy with an arbitrary number is not applicable to the Rules and Regulations or Minimum Standards and may be in violation with the FAA Airport Sponsor Assurances (notably Assurance #22 Economic Nondiscrimination). First right-of-refusal protocols and public notice requirements are dictated by the existing lease terms and conditions of a specific lease agreement. It is important to note Section 1.4 of the Minimum Standards and Section 1.6 of the Rules and Regulations identifies the County's proprietary exclusive right to subleasing of County-owned hangars.</p> <p>Equitable access to lease and occupy County-owned hangars for interested parties is conducted through waitlist protocols. The waitlist protocols should address the order in which individuals are eligible for an available hangar as well as ownership transfers and hangar trades.</p> <p>As such, a change was not deemed necessary.</p>
<b>C2</b>	I took a review pass per the first email. Made a few comments. Of course, for an effort such as this, ideally the consultant will find it worth the resources for a professional review. I know that's who they are and what they do, but this intersects various spaces and one can often be unknowingly narrowly focused. I think my comments mostly stem from that reality.
<b>R2</b>	The draft Minimum Standards and Rules and Regulations have been reviewed by multiple individuals representing various perspectives. This review process included Airport management, County representatives, Airport Advisory Body members, and stakeholders.

### **Rules and Regulations**

<b>C3</b>	Section 1.6 Proprietary Exclusive Rights: Other FBOs provide lubricants, aircraft ground handling services, aircraft tiedown, and aircraft storage.
<b>R3</b>	<p>Section 1.6 has been revised as follows:</p> <p><i>"The County is exercising its proprietary exclusive right for the provision of Fixed Base Operator (FBO) services (Commercial aviation fuels and lubricants, aircraft ground handling services, passenger and crew services, aircraft tiedown, and aircraft storage including leasing and subleasing of hangars)."</i></p>
<b>C4</b>	What is the penalty for someone who does not meet or breaks rules? Does that need to be defined somewhere. Progressive discipline? Under what authority. Will there be written warnings or can Director throw someone off airport?
<b>R4</b>	Section 1.5 Authority of Director and Section 1.7 Enforcement delegates authority to enforce all Legal Requirements (including the Rules and Regulations) to the Director in conjunction with the County Fire Department and County Sheriff's Office (including Law Enforcement Officers).

## STAKEHOLDER COMMENT COMPILATION AND RESPONSE

<b>C5</b>	Section 2.3 Commercial Activities: The County cannot prohibit an individual from letting a friend train in the aircraft owner's aircraft.
<b>R5</b>	<p>Section 2.3 has been revised as follows:</p> <p><i>"Based Aircraft shall not be used for Commercial Aeronautical Activities unless expressly authorized by an Agreement with the County <b>and consistent with the Minimum Standards. Utilization of the Based Aircraft may be used</b> for the purpose of training or increasing the flying proficiency of the Aircraft Owner or members of the Aircraft Owner's immediate family <b>shall not be considered a Commercial Aeronautical Activity.</b>"</i></p>
<b>C6</b>	Section 2.5 First Amendment Activities: Do I need the Director's permission to have a bumper sticker on a privately-owned vehicle?
<b>R6</b>	<p>Section 2.5 has been revised as follows:</p> <p><i>"Conduct of or participation in solicitation, picketing, demonstrating, parading, marching, patrolling, sit-ins, sit-downs, or other similar activities and/or assembling, carrying, distributing, or displaying pamphlets, signs, placards, or other materials is prohibited <b>on County-owned property</b> without prior written permission of the Director."</i></p>
<b>C7</b>	Section 2.10 Animals: Rats, mice, snakes have all been killed in hangars and will in the future.
<b>R7</b>	<p>Section 2.10 has been revised as follows:</p> <p><i>"No person, except those authorized by the <del>County</del><b>State of North Carolina under a Wildlife Take Permit for Airports</b>, shall intentionally hunt, pursue, trap, catch, injure, or kill any <del>animal</del><b>small mammal, turkey, or deer</b> at the Airport."</i></p>
<b>C8</b>	Section 3.3 Non-Airworthy Aircraft: Who and how is progress monitored?
<b>R8</b>	<p>Section 3.3 has been revised as follows:</p> <p><i>"Only aircraft considered airworthy or with a special flight authorization by the FAA and military aircraft shall use the Airport for aircraft parking, staging, or storage. <b>Consistent with 14 CFR Chapter I [Docket No. FAA 2014-0463] FAA Policy on the Non-Aeronautical Use of Airport Hangars, as amended, Non-airworthy aircraft</b> (including Non-Commercial construction of amateur-built or kit-built aircraft in compliance with construction progress benchmarks) <b>in a County-owned Hangar</b> may undergo long-term major renovation or restoration <b>pursuant to a scheduled and approved maintenance plan</b> as long as the aircraft is stored in a Hangar approved for such Aircraft Maintenance or as otherwise previously authorized in writing by the Director."</i></p> <p>Additionally, the following has been added to Section 3.3:</p> <p><i>"<b>Airworthiness Certificate or maintenance log showing the date of an annual or 100-hour inspection shall be provided to the Director upon request.</b>"</i></p>

## STAKEHOLDER COMMENT COMPILATION AND RESPONSE

<b>C9</b>	Section 5.13 Non-Commercial Flying Club: The statement of “ <i>A flight instructor may receive Compensation for instruction or may be compensated by credit against payment of dues or flight time; however, that individual may not receive both Compensation and waived or discounted dues or flight time concurrently</i> ” is overreach.
<b>R9</b>	<p>FAA Order 5190.6B states "A flight instructor may receive monetary compensation for instruction or may be compensated by credit against payment of dues or flight time; however, that individual may not receive both compensation and waived or discounted dues or flight time concurrently."</p> <p>Section 5.13 has been revised as follows:</p> <p><i>“Consistent with FAA Order 5190.6B Airport Compliance Manual, Aa flight instructor may receive Compensation for instruction or may be compensated by credit against payment of dues or flight time; however, that individual may not receive both Compensation and waived or discounted dues or flight time concurrently.”</i></p>
<b>C10</b>	Section 5.13 Non-Commercial Flying Club: Maintenance area and hangar size should be 10%.
<b>R10</b>	<p>Section 5.13 addresses self-maintenance activities conducted by a Non-Commercial Flying Club. These requirements (360 square feet of maintenance area and 3,600 square feet of hangar) are consistent with Section 2.5 <i>Self-Service Maintenance</i> of the Minimum Standards.</p> <p>As such, a change was not deemed necessary.</p>
<b>C11</b>	Section 5.13 Non-Commercial Flying Club: The statement of “ <i>A qualified mechanic who is a Member of the Flying Club may perform maintenance work on aircraft owned by the Flying Club. The mechanic may receive Compensation for such maintenance work or may be compensated by credit against payment of dues or flight time; however, that individual may not receive both Compensation and waived or discounted dues or flight time concurrently</i> ” should be deleted.
<b>R11</b>	<p>FAA Order 5190.6B states: "A qualified mechanic who is a registered member and part owner of the aircraft owned and operated by a flying club may perform maintenance work on aircraft owned by the club. The mechanic may receive monetary compensation for such maintenance work or may be compensated by credit against payment of dues or flight time; however, that individual may not receive both compensation and waived or discounted dues or flight time concurrently. The airport sponsor may set limits on the amount of maintenance that may be performed for compensation."</p> <p>Section 5.13 has been revised as follows:</p> <p><i>“Consistent with FAA Order 5190.6B Airport Compliance Manual, Aa qualified mechanic who is a registered member and part owner of the aircraft owned and operated by a flying club may perform maintenance work on aircraft owned by the club. The mechanic may receive monetary compensation for such maintenance work or may be compensated by credit against payment of dues or flight time; however, that individual may not receive both compensation and waived or discounted dues or flight time concurrently. The airport sponsor may set limits on the amount of maintenance that may be performed for compensation.”</i></p>



## STAKEHOLDER COMMENT COMPILATION AND RESPONSE

<b>C12</b>	Appendix A-7 Non-Discrimination: Cannot compel people to enable delusion.
<b>R12</b>	<p>FAA Airport Sponsor Assurance #30 <i>Discrimination</i> states “It [airport sponsor] will promptly take any measures necessary to ensure that no person in the United States shall, on the grounds of race, color, and national origin (including limited English proficiency) in accordance with the provisions of Title VI of the Civil Rights Act of 1964 (78 Stat. 252, 42 U.S.C. §§ 2000d to 2000d-4); creed and sex (including sexual orientation and gender identity) per 49 U.S.C. § 47123 and related requirements; age per the Age Discrimination Act of 1975 and related requirements; or disability per the Americans with Disabilities Act of 1990 and related requirements, be excluded from participation in, be denied the benefits of, or be otherwise subjected to discrimination in any program and activity conducted with, or benefiting from, funds received from this Grant.”</p> <p>As such, a change was not deemed necessary.</p>
<b>C13</b>	How do the new Rules impact individual tenants who have been conducting activities in the past that the Rules now prohibit.
<b>R13</b>	Appendix A-10 Compliance with Legal Requirements and Agreements requires all entities leasing, occupying, and/or developing Airport land and Improvements shall comply with Legal Requirements (including the Rules and Regulations) upon the effective date (outlined in Appendix A-9).
<b>C14</b>	Appendix A-23 Possible Grounds for Rejecting Application: Bullet #10 mentions “sublease” but only to the extent where sublessees have to follow all the safety rules as the original lease but not anywhere where the Airport is notified that the lessee intends to sublease.
<b>R14</b>	<p>This section is addressing possible grounds for rejection which includes consideration of a default of an agreement or sublease at any other airport.</p> <p>To ensure clarity, Bullet #10 has been revised as follows:</p> <p>“The entity or any officer, director, agent, representative, shareholder, or key employee thereof has defaulted in the performance of any Agreement <del>or Sublease</del> at the Airport <b>or any Agreement or sublease</b> at any other airport.”</p> <p>Remaining areas of the Minimum Standards and Rules and Regulations have been revised to remove subleasing language except for Rules and Regulations Section 1.6 Proprietary Exclusive Rights (see R3) and Minimum Standards Section 1.4 Exclusive Rights.</p>

### Minimum Standards

<b>C15</b>	Feels a bit “big” for RUQ and true general aviation airport. Are these suggestions coming from or based on mirroring a Part 139 or airport with commercial carriers?
<b>R15</b>	The Minimum Standards were developed specifically for the Airport based on AMCG’s site visit to meet with Airport management, tour the Airport, and meet with existing commercial aeronautical operators. Additionally, AMCG gathered and considered relevant information from comparable airports. The Minimum Standards were developed provide a level playing field for commercial aeronautical operators to compete while providing the County (and users) the assurance of a minimum level of services to be provided at the Airport.
<b>C16</b>	Like the overall idea but listing specific square feet areas seem larger than works for this airport.
<b>R16</b>	Section 1.2 <i>Developing Minimum Standards</i> of Advisory Circular 150/5190-7 Minimum Standards for Commercial Aeronautical Activities outlines factors to consider when developing Minimum Standards (Section f.). Question #3 states “How much space will be required for each type of aeronautical activity that may prospectively operate at the airport?” As such, specific space requirements were developed based on current commercial aeronautical operators and the comparable airport research.

## STAKEHOLDER COMMENT COMPILATION AND RESPONSE

<b>C17</b>	Overly specific in the hangar size. Why put limits if an aircraft safely fits. How does this impact individual tenants or businesses working on their own aircraft who do not have a 3,600 sf hangar?
<b>R17</b>	<p>See R16.</p> <p>As stated in R18, the Minimum Standards apply to any entity engaging in commercial general aviation aeronautical activities. Aeronautical activity is defined in Appendix B of the Rules and Regulations as <i>“Any activity or service that involves, makes possible, facilitates, is related to, assists in, or is required for the operation of aircraft. Any activity which contributes to, or is required for, the safety of such operations. Any activities which have a direct relationship to the operation of aircraft or the operation of the Airport.”</i> Section 2.5 of the Minimum Standards outlines requirements for Commercial Aeronautical Operators engaged in Self-Service maintenance.</p> <p>Appendix A-12 of the Rules and Regulations addresses an Aircraft Owner’s right to Self-Service. This section states <i>“An Aircraft Owner or the Aircraft Owner’s Employees may perform Self-Services (fueling, maintenance, or repair) on the Aircraft Owner’s aircraft utilizing the Aircraft Owner’s vehicles, equipment, and resources (Self-Service). An Aircraft Owner or the Aircraft Owner’s Employees are permitted to perform such Self-Services on the Aircraft Owner’s aircraft provided there is no attempt to perform such services for others for Compensation and further provided that such right is conditioned upon compliance with the PMCDs and all applicable Legal Requirements.”</i></p>
<b>C18</b>	Do these Minimum Standards apply to all tenants or just the ones conducting business activities? Or is this what is required to get an LFBO lease?
<b>R18</b>	<p>These Minimum Standards apply to any entity engaging in commercial general aviation aeronautical activities. Aeronautical activity is defined in Appendix B of the Rules and Regulations as <i>“Any activity or service that involves, makes possible, facilitates, is related to, assists in, or is required for the operation of aircraft. Any activity which contributes to, or is required for, the safety of such operations. Any activities which have a direct relationship to the operation of aircraft or the operation of the Airport.”</i></p> <p>As stated in Section 1.6 of the Minimum Standards, <i>“Unless provided for herein or within an Agreement, no entity shall be allowed to engage in Activities at the Airport under conditions that do not comply with these Minimum Standards, unless an exemption or variance has been approved by the County consistent with Appendix A-19 of the Rules and Regulations.”</i> The Minimum Standards define “Activities” as “Commercial General Aviation Aeronautical Activities” in Section 1.1.</p>
<b>C19</b>	Section 1.6 Applicability: I feel 3 months should be sufficient. 6 months just gives people too much time to drag things out.
<b>R19</b>	<p>Six months has been determined to allow adequate time for the County to identify impacted entities and negotiate a new agreement or permit. Additionally, six months from the time of adoption is consistent with industry standards.</p> <p>As such, a change was not deemed necessary.</p>



## STAKEHOLDER COMMENT COMPILATION AND RESPONSE

<b>C20</b>	<b>Section 2.6 Airport Sponsor Assurances: The County will get involved in an Operator's pricing?</b>
<b>R20</b>	<p>FAA Airport Sponsor Assurance #22 <i>Economic Nondiscrimination</i> states "In any agreement, contract, lease, or other arrangement under which a right or privilege at the airport is granted to any person, firm, or corporation to conduct or to engage in any aeronautical activity for furnishing services to the public at the airport, the sponsor will insert and enforce provisions requiring the contractor to: (1) Furnish said services on a reasonable, and not unjustly discriminatory, basis to all users thereof, and (2) Charge reasonable, and not unjustly discriminatory, prices for each unit or service, provided that the contractor may be allowed to make reasonable and nondiscriminatory discounts, rebates, or other similar types of price reductions to volume purchasers."</p> <p>To ensure clarity, Section 2.6 has been revised as follows:</p> <p><i>"Operator may provide reasonable discounts, rebates, or other similar types of price reductions based on the type, kind, or class of Airport user. In the event of an informal complaint (under 14 CFR Part 13) or formal complaint (under 14 CFR Part 16) and upon request by the County, Operator shall submit a schedule of product, service, and facility pricing to the County within 14 calendar days. In addition to identifying the Operator's product, service, and facility pricing, the schedule shall identify any discounts, rebates, or other similar types of price reductions offered by Operator."</i></p>
<b>C21</b>	Is this really geared for new tenants wanting to come to the airport, or if someone were to ever build their own hangar for the intended purpose. The current business tenants do not feel that they meet these suggested requirements. With clarification on if the FBO building counts for those operators who lease space owned by the County they would meet them. Currently MX SASO do not meet these requirements w/o our FBO space.
<b>R21</b>	<p>See R17.</p> <p>As stated in R18, the Minimum Standards apply to any entity engaging in commercial general aviation aeronautical activities (currently identified under an LFBO agreement). For example, an entity currently conducting aircraft maintenance at the Airport under an LFBO agreement would fall under Section 3. Aircraft Maintenance Operator (SASO). Individual aircraft owners conducting self-services (including aircraft maintenance) on the aircraft owners' aircraft are not considered a commercial activity and, therefore, not impacted by the Minimum Standards.</p>
<b>C22</b>	<b>Section 3.5 Defueling: Does not seem applicable to any current tenants/situations</b>
<b>R22</b>	<p>Section 3.5 of the Minimum Standards was specifically developed for unique situations and commercial operators (existing or prospective) that may require this option in the future. If Section 3.5 of the Minimum Standards is not applicable to an existing operator, compliance is not required.</p> <p>As such, a change was not deemed necessary.</p>
<b>C23</b>	<b>How can we stop individuals working from a truck or randomly out of their annual lease hangar without a Limited FBO type lease used by County.</b>
<b>R23</b>	Section 8 of the Minimum Standards outlines the requirements to be an Independent Aircraft Maintenance Operator. An "Independent Operator" is defined in Appendix B of the Rules and Regulations as <i>"An entity offering aeronautical service(s) but without an established place of business on the Airport."</i> As stated in Section 8 of the Minimum Standards, an Independent Aircraft Maintenance Operator can be approved for a Commercial Operator Permit upon submission of a Commercial Operator and Lessee Application. It is important to note independent maintenance activities are limited to based aircraft, occurring in a facility or location approved in writing by the County, upon submission of proper certification, and submission of required insurance.

## STAKEHOLDER COMMENT COMPILATION AND RESPONSE

<b>C24</b>	So, the County can create a monopoly situation for one MX provider or one flight school if they want? What if their prices are not competitive but they do offer services that can meet the demand – still force everyone to use them?
<b>R24</b>	Section 8.2 and Section 9.2 provide the County, in the County’s sole discretion, the option to prohibit Independent Operators at the Airport. As outlined in Advisory Circular 150/5190-7 Minimum Standards for Commercial Aeronautical Activities and FAA Order 5190.6 Airport Compliance Manual, the County is not federally required to permit Independent Operators at the Airport. However, the County believes allowing Independent Operators to conduct commercial aeronautical activities is appropriate currently, within the confines and requirements of the Minimum Standards.
<b>C25</b>	Attachment A: I am waiting for a response from my insurance carrier for how this will affect cost to all Operators.
<b>R25</b>	<p>Section 1.2 <i>Developing Minimum Standards</i> of Advisory Circular 150/5190-7 Minimum Standards for Commercial Aeronautical Activities outlines factors to consider when developing Minimum Standards (Section f.). Question #6 states “What requirements will be imposed regarding minimum insurance coverage and indemnity provisions?” As such, specific insurance requirements were developed based on industry standards. However, the recommended insurance requirements have been revised as follows based on discussions with existing commercial aeronautical operators at the Airport.</p> <p>Attachment A (Minimum Insurance Requirements)</p> <ul style="list-style-type: none"> <li>• Commercial General Liability: <b>\$1M each occurrence for all operators</b></li> <li>• Hangarkeeper’s Legal Liability: <b>\$1M each aircraft and each occurrence for all operators</b></li> </ul>
<b>C26</b>	Insurance – major increase. Very concerned about costs. Other smaller airports in the state \$1,000,000 which is the limit required for vendors to work on airport property.
<b>R26</b>	See R26.
<b>C27</b>	Why \$5,000,000 and \$10,000,000 – huge increase from current \$1M. Cost to increase coverage quoted to current tenant \$60,000 annually.
<b>R27</b>	See R26.