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Attorney for Resort Aviation
Services. Inc.

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

In the Matter of Applications of)	WT DOCKET NO. 02-179
)	
RESORT AVIATION SERVICES,)	
INC.)	REQUESTS FOR PRODUCTION
)	OF KOOTENAI COUNTY,
)	COEUR D'ALENE AIRPORT,
)	KOOTENAI COUNTY, IDAHO, TO
)	RESORT AVIATION SERVICES, INC.
For Renewal of Aeronautical Advisory)	AND RESPONSES THERETO
Station WYT9, Coeur d'Alene Airport,)	
Hayden. Idaho)	
)	
and)	
)	
KOOTENAI COUNTY)	
COEUR D'ALENE AIRPORT,)	
)	
)	
For a New Aeronautical Advisory)	
Station at Coeur d'Alene Airport,)	
Hayden. Idaho)	

Resort Aviation Services, Inc. responds to the requests for production of Kootenai
County Coeur d'Alene Airport as follows:

number of copies rec'd ctg
List A B C D E

REQUEST FOR PRODUCTION NO. 1: Please produce copies of any and all handbooks utilized by Resort Aviation Services, Inc. in its administration of the Unicorn license.

RESPONSE TO NO. 1. All documents relating *to* use of the Unicorn are produced,

REQUEST FOR PRODUCTION NO. 2: Please produce a copy of the employee handbook given to Resort Aviation Services, Inc. employees who administer the FCC Unicorn license.

RESPONSE TO NO. 2. The documents produced in response to No. 1 are all given to employees.

REQUEST FOR PRODUCTION NO. 3: Please produce a copy of the resume or *curriculum vitae* of Kathleen Garren.

RESPONSE TO NO. 3: The Garren resume is produced.

REQUEST FOR PRODUCTION NO. 4: Please produce any and all purchase orders, invoices, or other documentation evidencing the amount of fuel (in gallons) purchased by Resort Aviation Services, Inc. for the years:

- (a) 1999;
- (b) 2000;
- (c) 2001; and
- (d) 2002.

RESPONSE TO NO. 4. All fuel flowage reports are produced. These have all been submitted to the County on the dates shown. These reflect all fuel purchased.

REQUEST FOR PRODUCTION NO. 5: Please produce copies of each and every Unicorn license application applied for by Resort Aviation Services, Inc. relating to the Unicorn license at the Coeur d'Alene Airport, in Kootenai County, Idaho.

RESPONSE TO NO. 5. The only application is in this case. A copy is produced. Resort Aviation Services, Inc. acquired the Unicorn license with the purchase of Empire Airlines property.

REQUEST FOR PRODUCTION NO. 6: Please produce copies of any and all written correspondence to any entity (including but not limited to the Coeur d'Alene Airport) generated by Resort Aviation Services, Inc. pertaining to the use of the FCC Unicorn license.

RESPONSE TO NO. 6. Copies are produced. There will be overlap between the documents produced in response to No. 6 and the documents produced in response to No. 7 since "complaints" and rebuttals also fall under this heading. Only one set of copies will be produced.

REQUEST FOR PRODUCTION NO. 7: Please produce copies of any and all written complaints directed to Resort Aviation Services, Inc. pertaining to its administration of the FCC Unicorn license.

RESPONSE TO NO. 7. Copies are produced. See also response to No. 6.

REQUEST FOR PRODUCTION NO. 8: Please produce copies of the written job descriptions for all Resort Aviation Services, Inc. employees who deal with the administration of the FCC Unicorn license.

RESPONSE TO NO. 8. There are no written **job** descriptions. The employees who deal with the Unicorn all receive the same training as set forth in the documents produced above.

DATED this 21st day of November, 2002.

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CERTIFICATE OF SERVICE

I HEREBY certify that a copy of the foregoing was mailed, first class mail, postage prepaid, this 22nd day of November, 2002 to:

JOHN CAFFERTY, ESQ.
KOOTENAI COUNTY DEPT. OF
LEGAL SERVICES
451 GOVERNMENT WAY
P. O. BOX 9000
COEUR D'ALENE, IDAHO 88316-9000

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