

Essential Air Service (EAS) Proposal

Chautauqua County Jamestown Airport



DOT-OST-2003-14950

May 2025

Executive Summary

The Chautauqua County Jamestown Airport (JHW) respectfully submits this application to the U.S. Department of Transportation (U.S. DOT) requesting reinstatement of Essential Air Service (EAS) at JHW. The proposed reinstatement is supported by robust market demand, extensive passenger leakage data, and unmistakable evidence of regional economic and tourism benefits.

JHW is strategically positioned in the southwestern corner of New York State and was formerly part of the EAS program until service was discontinued in 2018. With airport infrastructure fully certified and maintained for commercial operations under FAA Part 139, the airport is prepared to immediately support scheduled commercial service.

Chautauqua County has identified Southern Airways Express as a strong candidate airline partner for the EAS contract, given its current presence in the Mid-Atlantic region and its proven partnership with United Airlines at Washington Dulles International Airport (IAD), with the understanding that the U.S. DOT will solicit bids from eligible EAS providers as part of the process.

The Chautauqua County Jamestown Airport (JHW) is a perfect addition to the Southern Airways Express mid-Atlantic footprint. Having four other markets in Pennsylvania and a successful hub partnership with United Airlines at Washington/Dulles market, sets the stage for a successful partnership and route with JHW.

Service Proposal and Readiness

Chautauqua County proposes that scheduled commercial air service be restored from Jamestown (JHW), with a new destination to Washington Dulles International Airport (IAD), to provide direct connectivity to a major domestic and international hub. The proposed service would operate on a schedule accommodating both business and leisure travel, with two daily round trips, Monday through Saturday.

To facilitate immediate operations, the County confirms that JHW remains fully operational under FAA Part 139 certification. The airport's facilities are maintained to meet all safety and operational standards, and staff are prepared to support commercial flight operations, including TSA screening, ground handling, and customer service. Should the U.S. DOT approve this request and select an airline provider, the County anticipates that commercial air service could begin as early as June 21, 2025, aligning with the start of the peak summer travel season and airline interest.

Southern Airways Story

Southern Airways Express, founded in 2013 and headquartered in Palm Beach, Florida, has rapidly grown to become one of the largest commuter airlines in the United States. Operating more than 200 daily flights across five U.S. time zones, the airline connects nearly 40 cities spanning the Mid-Atlantic, Gulf South, Midwest, Rocky Mountains, West Coast, and Hawaii. A subsidiary of

Surf Air Mobility, Southern operates under an FAA Part 135 certificate, focusing on short-haul regional connectivity and underserved markets.

Recent Developments

In March 2022, Southern Airways Corporation acquired Air Choice One, merging its scheduled service operations under the Southern Airways Express brand while continuing charter flights under the Air Choice One certificate. This strategic acquisition was designed to streamline operations and strengthen Southern's footprint within the Essential Air Service (EAS) program—an initiative that subsidizes flights to smaller, rural communities across the U.S.

EAS Contracts

Southern Airways Express has played a significant role in the EAS program—an initiative by the U.S. Department of Transportation that ensures air connectivity for rural and underserved communities. Southern has become a trusted provider of subsidized air service across the country, offering reliable regional connections that often feed into larger airline networks via major hubs. The carrier's cost-effective operations, small-aircraft flexibility, and consistent on-time performance have made it a frequent winner of competitive EAS contracts.

Notable examples of Southern's EAS service include:

- **Arkansas:** Following the 2016 liquidation of SeaPort Airlines, Southern was selected to restore vital connectivity to El Dorado (ELD), Harrison (HRO), and Hot Springs (HOT). Under the EAS program, Southern launched frequent weekly round trips from these communities to Dallas/Fort Worth (DFW) and Memphis (MEM). While some local stakeholders initially preferred alternative carriers, the U.S. DOT awarded the contracts to Southern, citing its operational readiness and lower subsidy requirements as key advantages.
- **Nebraska:** In 2021, Southern secured a two-year EAS contract to serve Chadron Municipal Airport (CDR). The agreement included 12 weekly round trips to Denver International Airport (DEN), operated using nine-seat Beechcraft King Air 200 aircraft. The route provided a critical link between northwest Nebraska and a major connecting hub, enabling both community mobility and economic development.
- **Illinois:** Beginning December 1, 2022, Southern launched EAS-supported service at Quincy Regional Airport (UIN). Under a four-year contract, the airline operates 36 weekly round trips split between Chicago O'Hare International Airport (ORD) and St. Louis Lambert International Airport (STL). The dual-hub structure offers Quincy residents greater flexibility and access to both northbound and southbound national flight networks.

Southern's growing portfolio of EAS cities highlights its commitment to connecting small communities with the national air transportation system. Its ability to tailor aircraft and schedules to meet local needs—while maintaining low operating costs—continues to set it apart in this federally subsidized segment of the industry.

Route Network and Airline Partnerships

Southern Airways Express operates a strategically distributed point-to-point and hub-and-spoke network that spans key regions across the continental United States and Hawaii. The airline's network is designed to connect small and mid-sized communities to major urban centers, often feeding into larger airline systems via its presence at key hub airports.

The carrier maintains operational “mini hubs” or focus cities in:

- **Washington Dulles (IAD)** – Supports East Coast operations, particularly in the Appalachian region and beyond.
- **Pittsburgh (PIT)** – A critical Mid-Atlantic hub, providing connections into Pennsylvania and Ohio communities.
- **Memphis (MEM)** – One of Southern’s earliest hubs, supporting both EAS and non-subsidized services in the Mid-South region.
- **Nashville (BNA)** – An increasingly important base for regional service across the Southeast.
- **St. Louis (STL)** – Key for Southern’s Illinois and Missouri service.
- **Chicago (ORD/MDW)** – Serves as a Midwest connection point, particularly for passengers transferring to American or United flights.
- **Dallas/Fort Worth (DFW)** – A primary Southern hub for EAS routes in Arkansas and the South-Central U.S.
- **Denver (DEN)** – Vital for Rocky Mountain operations, including routes in Nebraska and New Mexico.
- **Phoenix (PHX)** – Serves as a regional gateway for Southern’s Southwest desert network.
- **Los Angeles (LAX)** – Supports Southern’s growing West Coast service footprint.

In Hawaii, Southern operates under the Mokulele Airlines brand, offering high-frequency inter-island service with its fleet of Cessna Caravans, connecting remote communities across the state with major airports on Oahu, Maui, the Big Island, and Molokai.

To extend its reach beyond regional flights, Southern has established interline agreements with several major U.S. carriers, including:

- **United Airlines**
- **American Airlines**
- **Alaska Airlines**
- **Hawaiian Airlines**

These partnerships allow passengers to book a single itinerary that includes both Southern Airways flights and connections on larger network carriers. Checked luggage can be transferred automatically between airlines, and travelers gain access to more seamless transfers through

major hubs. This interline framework has been especially valuable for EAS communities, providing them with one-stop access to national and international destinations.

Southern's strategic network design—paired with its airline partnerships—enables the carrier to function not just as a commuter airline, but as a feeder bridge between America's rural communities and the broader global air transportation system.

Continental U.S. Route Map



Southern Airways Express Fleet

Southern Airways Express operates a specialized fleet of small regional aircraft tailored to serve short-haul routes and smaller markets, particularly those included in the EAS program. The airline prioritizes aircraft that are cost-efficient, well-suited to short runways, and capable of operating with low passenger volumes—a crucial factor for connecting rural and underserved communities.

Southern Airways Express operates a lean, efficient, and purpose-built fleet that aligns with its mission **to connect small communities with affordable and reliable air service**. With an eye toward future innovation—especially through electrification—the airline is positioning itself at the forefront of next-generation regional aviation. Its use of small turboprops, combined with a thoughtful electrification roadmap through Surf Air Mobility, reflects a forward-looking strategy to maintain leadership in the commuter and EAS segments.



Current Fleet (as of 2025)

Southern Airways Express, including operations under its Hawaiian brand Mokulele Airlines, utilizes the following aircraft types:

Aircraft Type	Quantity	Capacity	Primary Role	Key Features / Notes
Cessna 208B Grand Caravan EX	30+	9 passengers	Backbone of EAS and short-haul services across mainland U.S. and Hawaii	STOL capability, low operating costs, ideal for low-infrastructure airports

Fleet Strategy

Southern Airways' fleet strategy is guided by a few key principles:

- **Standardization:** The heavy reliance on the Cessna Caravan helps control maintenance costs, streamline pilot training, and improve dispatch reliability.
- **Right-Sizing:** The airline focuses on matching capacity with demand, using aircraft that can remain profitable even with single-digit passenger loads—key for many EAS markets.
- **Flexibility:** With both unpressurized Caravan aircraft, Southern can tailor aircraft selection to route profile, runway length, and passenger demand.

Fleet Orders and Future Plans

Southern Airways' fleet is expanding substantially over the months and years ahead with approximately 90 new aircraft on order. Four of the new Caravans received were put into service in Q4 2024; these aircraft will offer 50% less fuel consumption and 70% less carbon emissions.

Having an aircraft based at JHW is a criterion that both Southern Airways and the airport agree is a game changer for reliable service between JHW and IAD.

Performance on Essential Air Service Routes

Southern Airways Express has established itself as a consistent and reliable provider within the EAS program, earning a reputation for balancing cost-efficiency, operational reliability, and service continuity. With more than a decade of experience navigating the unique demands of small-market air service, Southern has become a frequent and trusted partner of the U.S. DOT in awarding subsidized contracts.

The airline's success in the EAS space stems from several key strengths:

- Low operating costs through use of efficient aircraft like the Cessna Caravan.
- Scalable scheduling models that allow Southern to flexibly match capacity with demand.
- High on-time performance, bolstered by point-to-point service.
- Rapid ramp-up capabilities, often taking over routes on short notice when other providers withdraw or cease operations.

A notable example occurred in Arkansas, where Southern was awarded contracts for El Dorado, Harrison, and Hot Springs following the sudden liquidation of SeaPort Airlines. While local stakeholders had initially preferred other carriers, the DOT selected Southern based on its proven track record, its ability to mobilize quickly, and its lower subsidy bid—a reflection of its operational efficiency and long-term viability.

Similar patterns have emerged in other states, including Illinois and Nebraska, where Southern was chosen in competitive EAS solicitations, even in instances where its proposal was not the top community recommendation. The DOT has consistently prioritized Southern's history of reliable service, its financial discipline, and its ability to maintain uninterrupted operations, even during periods of industry turbulence.

Southern's performance during the COVID-19 pandemic further solidified its standing as a dependable EAS carrier. While many airlines significantly reduced or suspended service, Southern maintained a substantial portion of its network, ensuring that rural communities retained vital air access for medical travel, business continuity, and essential connectivity.

In addition, Southern has made proactive investments in newer aircraft, fleet standardization, and pilot training pipelines to ensure service stability amid regional pilot shortages—an issue that has disrupted many EAS providers in recent years.

Why now?

“Southern Airways is an entirely different company than when we exited the JHW market many years ago, with new ownership, leadership and branding,” states Chief Commercial Officer Mark Cestari.

Since Southern Airways' previous operations at JHW, significant improvements have been implemented across multiple areas of operation. The System Operations Control (SOC) has undergone substantial expansion and upgrading, enhancing its capability to oversee all flight operations and respond effectively to operational challenges. The airline has achieved full staffing levels with comprehensive pilot resources, including the establishment of a new training center in DuBois, PA. This facility enables pilots to train and gain experience in the challenging weather conditions typical of the mid-Atlantic region. Southern Airways has also made substantial investments in technology, communications resources, and fleet modernization since its earlier operations at JHW.

The Dulles hub represents a significant upgrade from the previous JHW-PIT routing, serving as a superior gateway location. The Washington/Northern VA area has emerged as a crucial origin and destination market for JHW travelers. The Washington METRO system now offers convenient direct service from Dulles Airport to Union Station in downtown D.C., providing passengers with frequent, dependable, and cost-effective ground transportation throughout the region.

Interline connectivity stands as the most compelling factor in the service's potential success, with Southern Airways positioned as the ideal carrier for this route. Dulles International Airport functions as a major connecting hub for United Airlines, offering service to more than one hundred domestic and international destinations. Through its interline ticketing and baggage agreement, Southern Airways provides JHW passengers with single-ticket booking capabilities, protection across both carriers during irregular operations, and seamless baggage handling from Jamestown Airport through to their final destination.

Market conditions further strengthen the route's sustainability prospects. While alternative gateway airports in Cleveland, Pittsburgh, and Buffalo face challenges with increasing congestion, lengthy TSA security check-in times, extended drive times, and costly parking, JHW offers distinct advantages. Erie's limited service options and poor connectivity further highlight JHW's strengths. As passenger convenience and ease of travel become increasingly crucial factors in air travel decisions, JHW airport's proximity, complimentary parking, efficient screening processes, and enhanced amenities - including a new restaurant, rideshare services, and rental car availability - position it as an excellent choice for both outbound and inbound Chautauqua County travelers.

Furthermore, over the past decade, Southern has developed and expanded its community engagement and outreach programs in the small communities which they serve. These include tailored corporate discount program which provides discounts and incentives for local businesses and organizations who fly on Southern or encourage their clients and vendors to do so. The Campus Connector program provides discounts for local colleges and universities. The Care Connector program assists local hospitals in onboarding visiting physicians as well as transporting patients in/out of their facilities for specialized treatment. Southern also offers discounts and incentives to select public sector employees and their families. Southern will also work in concert with local Chambers of Commerce, Destination Marketing Organizations, the National Comedy

Center, The Chautauqua Institution and other regional stakeholders.

Community Needs and Market Demand

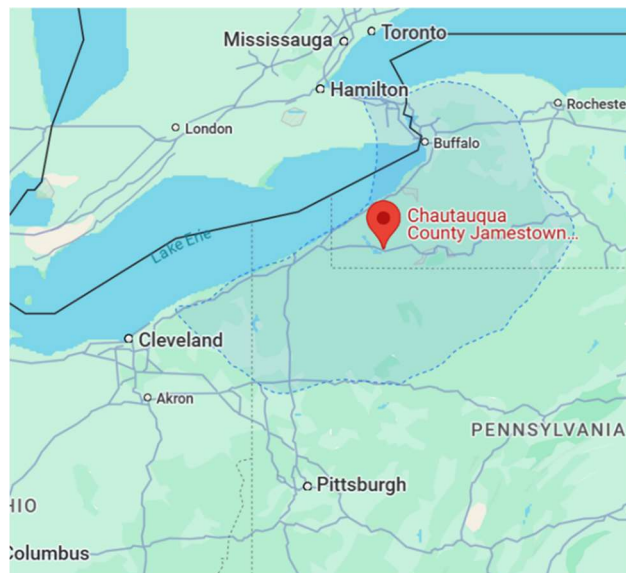
In 2024, Chautauqua County commissioned a comprehensive catchment analysis that revealed compelling evidence supporting the reinstatement of Essential Air Service (EAS) at Chautauqua County Jamestown Airport (JHW). The study employed sophisticated methodologies combining DOT data, travel search analytics, and Census-based modeling to evaluate market potential. Using Airport Catchment Analytics (ACA) from Airline Data Inc., the analysis provides a detailed understanding of both resident and visitor travel patterns within the region. The analysis also revealed a compelling opportunity for reinstating air service.

The study utilized a proprietary postal code identification methodology that combines multiple data sources:

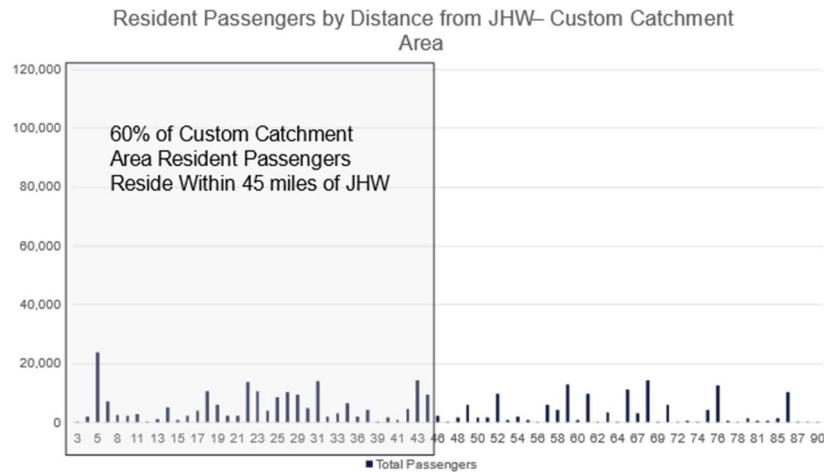
- Travel web searches
- Department of Transportation data
- Census information
- MIDT passenger data

The methodology employs machine learning algorithms to correct for sampling biases and ensures accurate allocation of traffic to postal codes. This approach provides a more precise picture of true market demand by:

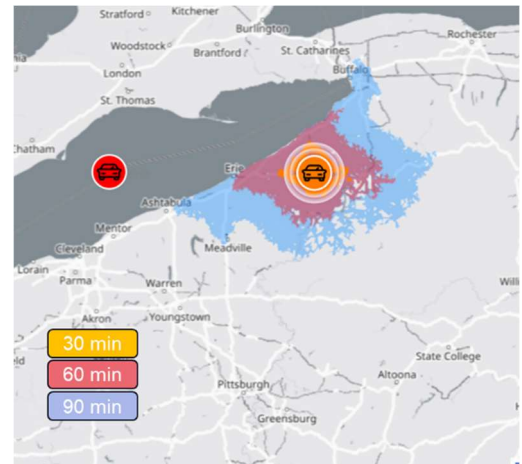
- Adjusting O&D rates using full-sample DOT/Sabre GDD data
- Targeting residential addresses while eliminating errant corporate card postal codes
- Verifying allocations against Census economic metrics and population statistics



The study identified 1,506 passengers per day each way (PDEW) traveling within JHW's 90-mile catchment zone—representing both local residents and visitors. Of that total, 916 PDEW (61%) are residents living in the defined catchment **area**, while the remaining 590 PDEW (39%) are visitors traveling to the region. Importantly, 60% of the resident passengers (approximately 549 PDEW) reside within just 45 miles of JHW, demonstrating that the majority of potential users are geographically closer to JHW than any competing airport. Despite this proximity, every one of these passengers is currently utilizing alternative airports due to the absence of commercial service at JHW.



These findings underscore an acute need for local air connectivity. The current situation forces area residents to drive between one and three hours to access commercial air service at larger hubs such as Buffalo Niagara International (BUF), Erie International (ERI), Cleveland Hopkins International (CLE), and Pittsburgh International (PIT). This dependence on distant airports places a significant burden on rural residents, particularly seniors, families, and business travelers, and represents a major barrier to accessibility. It also places Chautauqua County at a competitive disadvantage in terms of workforce mobility, tourism growth, and overall economic development.



Airport Name	Airport Code	Distance (miles)	Drive Time	FAA Hub Classification
Erie International Airport	ERI	50	1 hr.	Non-hub
Buffalo Niagara International Airport	BUF	75	1.5 hr.	Small hub
Cleveland Hopkins International Airport	CLE	155	2 hr. 25 min	Medium hub
Pittsburgh International Airport	PIT	180	2 hr. 50 min	Medium hub
Rochester International Airport	ROC	135	2 hr. 15 min	Small hub

Note: Airports are sorted by distance from JHW (closest to farthest)

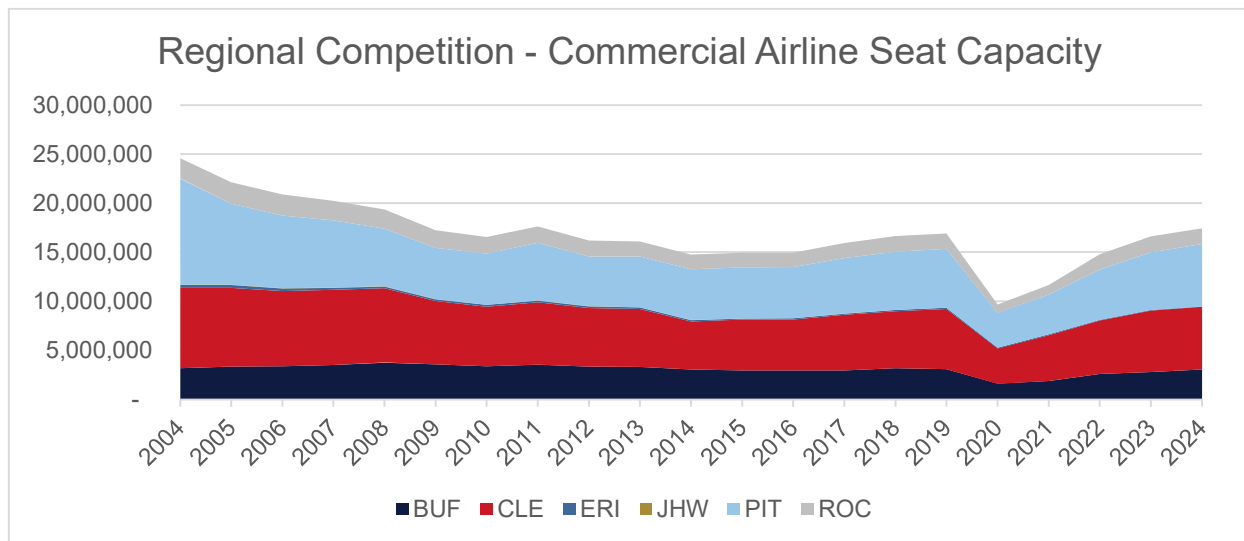
The FAA classifies airports into four main hub categories based on the percentage of total U.S. passenger enplanements:

- Large hub: 1% or more of total U.S. passenger enplanements
- Medium hub: Between 0.25% and 1% of total U.S. passenger enplanements
- Small hub: Between 0.05% and 0.25% of total U.S. passenger enplanements
- Non-hub: Less than 0.05% of total U.S. passenger enplanements
-

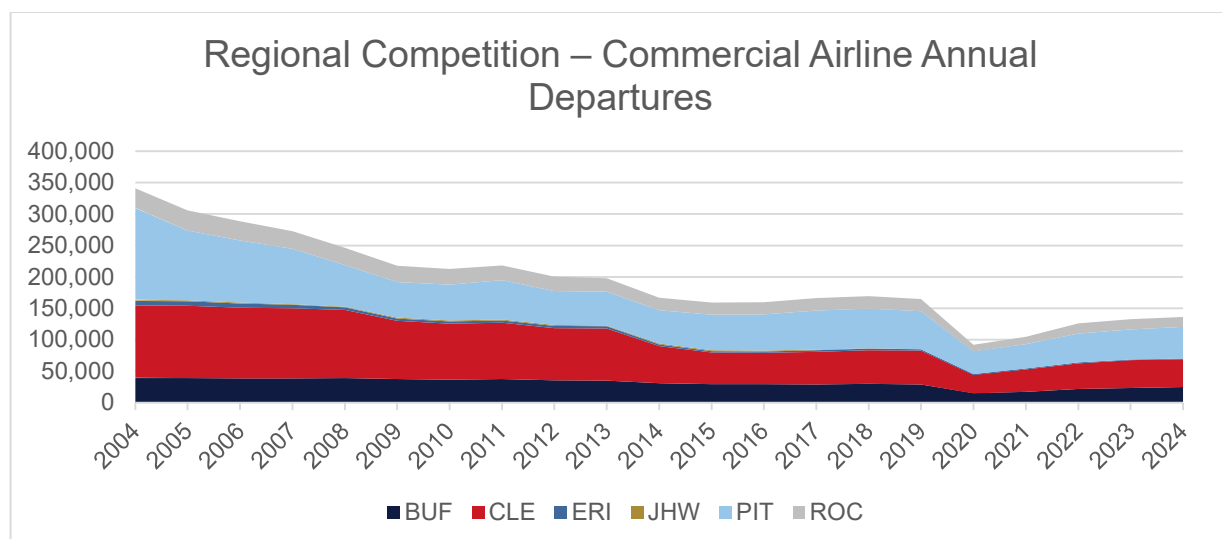
The current lack of local air service creates significant challenges:

- Drive times of 1-3 hours to alternative airports
- Reduced business competitiveness
- Limited tourism accessibility
- Healthcare access challenges
- Educational institution connectivity issues

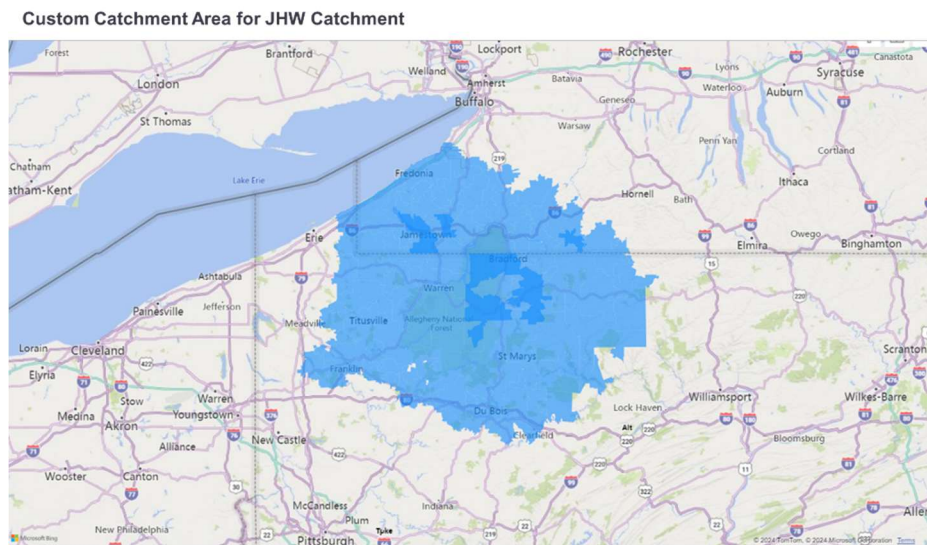
Since 2004, regional seat capacity has declined, primarily due to the dehubbing of CLE by Continental Airlines (United Airlines merger) between 2008 and 2014. Additionally, over the past 10 years, commercial airline seat capacity has increased at a modest CAGR of 1.7%.



Over the same 10-year period, commercial airline departures have declined 2% per annum and 2024 regional departures remained 17.2% below 2019 levels providing fewer flight options for regional passengers.



The market study further confirmed that the dominant travel demand from the catchment area is oriented toward hub cities and high-frequency destinations. The top 20 origin-and-destination (O&D) markets include Orlando, Fort Lauderdale, Atlanta, Tampa, and New York City, which aligns perfectly with the connectivity offered by a hub like Washington Dulles International Airport (IAD). These insights point to a viable and sustainable market for commercial service if the right hub and carrier combination can be secured under the EAS program.



The market analysis provides strong evidence supporting EAS reinstatement at JHW. With 1,506 PDEW in the catchment area and a majority of resident passengers within 45 miles of the airport, JHW presents a compelling opportunity for successful EAS service. The balanced mix of business and leisure traffic, combined with strong destination demand and clear service gaps in the current market, suggests high potential for sustainable air service through the EAS program.

The data demonstrates that JHW serves a vital role in regional transportation infrastructure, and reinstatement of EAS would address significant current service gaps while supporting economic development throughout the region. The strong presence of major carriers in the market and clear destination preferences provide a solid foundation for successful service implementation.

Economic and Tourism Significance

The reinstatement of commercial air service at JHW would represent a transformative economic development opportunity for Chautauqua County and the broader Southern Tier of New York and Northwestern Pennsylvania. The region's economy is diverse and driven by key sectors including advanced manufacturing, agriculture, healthcare, education, and tourism—all of which depend on reliable air access to markets, customers, partners, and talent.

From a tourism perspective, Chautauqua County is home to nationally significant cultural and recreational destinations that draw hundreds of thousands of annual visitors. The Chautauqua

Institution, a historic cultural and educational hub, attracts more than 250,000 visitors each summer for world-class lectures, concerts, and retreats. The region is also home to Lake Erie Wine Country, boasting dozens of vineyards and seasonal festivals, and the National Comedy Center, a Smithsonian-affiliated institution that has received national acclaim and regularly hosts guests from across the United States and abroad.

However, the lack of direct air service severely limits the County's ability to grow its tourism base and to support business recruitment and retention. Visitors must currently fly into Buffalo, Cleveland, or Pittsburgh and drive 1.5–3 hours to reach their destinations—an inconvenient and costly process that deters leisure travelers, group tours, and corporate meeting planners. The return of EAS-supported air service to a major connecting hub like IAD would dramatically improve accessibility, reduce travel friction, and catalyze further investment in local tourism infrastructure.

From a business standpoint, the absence of local air service creates real barriers to economic growth. Local employers report challenges in recruiting skilled workers, securing investment, and maintaining client relationships due to limited travel options. Reintroducing commercial service would facilitate regional business travel, strengthen ties to national and international markets, and serve as a key incentive in future economic development initiatives. JHW is one of the few remaining FAA Part 139 airports in the Northeast without commercial service—restoring that access would signal that the region is open for business and ready to grow.

Regional Competition and Leakage

Chautauqua County's 2024 passenger leakage analysis provided a stark illustration of the competitive pressure faced by JHW in the absence of commercial air service. The market is currently dominated by five regional airports: Buffalo Niagara International (BUF), Erie International (ERI), Cleveland Hopkins International (CLE), Pittsburgh International (PIT), and Rochester International (ROC). Each of these airports draws significant volumes of passengers from within JHW's natural catchment area.

The data show that JHW captures 0% of local passenger traffic—not due to lack of demand, but due to the complete absence of service. BUF and PIT alone account for over 58% of the catchment area's outbound traffic, with BUF capturing 32.4% and PIT 26.2%, followed by CLE (21.6%) and ROC (5.2%). These figures are even more striking when viewed in light of geography: over 60% of the JHW catchment population lives closer to Jamestown than to any of these competitors, with many of the highest passenger-producing ZIP codes located within 60 miles of JHW.

This leakage not only highlights the pent-up demand for local air service but also points to the critical need for federal support to reestablish a competitive offering at JHW. The airport is conveniently located near Interstate 86, offering easy access to most communities within the custom catchment area, particularly in Chautauqua, Cattaraugus, and Allegany Counties in New York; and Warren and Erie Counties in Pennsylvania.

Reintroducing scheduled flights to Washington Dulles (IAD) would offer a meaningful and competitive alternative to the status quo. IAD is a major hub for United Airlines, with over 150 domestic and international destinations, and a growing portfolio of global carriers. Importantly, Southern Airways Express—a likely airline partner—operates over 20 daily departures from IAD and staffs its own terminal (H Gates) with both above- and below-wing personnel, minimizing the need for new infrastructure or staff for a JHW route. Southern’s interline agreement with United would also ensure seamless passenger connections through ticketing, baggage handling, and transfer coordination.

Moreover, with the recent extension of the Washington Metro’s Silver Line, passengers arriving at IAD now have direct access to downtown Washington, D.C. via Union Station, providing added value for travelers connecting to federal agencies, universities, non-governmental organizations (NGOs), and global institutions located in the capital region.

Community Engagement and Stakeholder Support

Chautauqua County has initiated a comprehensive stakeholder engagement strategy to support the air service application. The County Executive's office is actively coordinating with diverse community stakeholders, including business leaders, economic development organizations, and elected representatives. Strategic planning sessions are being arranged between prospective airline carriers and key stakeholders, encompassing the County Legislature, regional chambers of commerce, and tourism promotion agencies.

The application's strength is further enhanced by letters of support from numerous community organizations and local businesses, which have been compiled and included in the appendix. These endorsements demonstrate the broad-based community commitment to the initiative's success.

To ensure the route's long-term viability, a collaborative marketing strategy will be implemented in conjunction with the selected airline provider. This strategy will:

- Raise community awareness of the new service
- Drive passenger utilization
- Highlight the route's convenience and connectivity advantages
- Showcase the economic benefits for the region

A robust performance monitoring system will be established to:

- Track key performance indicators
- Gather and analyze community feedback
- Generate regular performance reports
- Share actionable insights with both the airline partner and the US DOT

-
- Enable data-driven service adjustments and improvements

This coordinated approach, combining strong community support, strategic marketing, and diligent oversight, positions the route for sustainable success and demonstrates Chautauqua County's commitment to maintaining reliable air service for its residents and visitors.

Request for Federal Support

Chautauqua County respectfully requests that the U.S. Department of Transportation reinstate JHW's EAS subsidies to restore scheduled air service to a major hub airport, with a preference for connectivity through IAD.

In collaboration with the selected airline, the County will also explore opportunities for federal and state marketing assistance, public-private partnerships, and any regulatory support needed to expedite the service restart.

Conclusion

The reinstatement of commercial air service at Chautauqua County - Jamestown Airport is essential for the economic vitality and accessibility of the region. With a strong population base, proven travel demand, and a ready airport facility, JHW is well-positioned to support viable commercial service under the Essential Air Service program.

Chautauqua County stands fully committed to supporting this effort and working closely with the U.S. DOT, selected air carrier(s), and community partners to ensure a successful reintroduction of air service in 2025 and beyond.

We thank the U.S. Department of Transportation for its consideration and look forward to the opportunity to further discuss this important initiative.

Sincerely,

Brian Bates

Brian Bates
Interim Manager of Airports

Appendices

Proposed Operation:

	Option A	Option B
	C-208	C-208
Weekly Round Trips Scheduled		
JHW-IAD	12	17
Total	12	17
Operating Expenses		
Flying Operations	1,457,059	1,477,813
Fuel and Into Plane	437,002	574,522
Maintenance	575,890	806,119
Aircraft	477,300	477,300
Indirect	520,781	524,614
Total Operating Expenses	3,468,032	3,860,368
Operating Loss	3,468,032	3,860,368
Profit Element (5%)	173,402	193,018
Compensation Required	3,641,434	4,053,386
Annual Seats	11,070	15,678
Annual Passengers	6,642	9,407
Load Factor	60%	60%
Departures	1,230	1,742
Completion Factor	98.50%	98.50%
Compensation Required Year	3,641,434	4,053,386