U.S. Department
of Transportation
Federal Aviation Administration

NOV 28 2012

Keith Glazier
Vice President, Safety, Security and Regulatory Compliance
Pinnacle Airlines Corp.
One Commerce Square
40 S. Main St.
Memphis, TN 38103

Dear Mr. Glazier

This letter is in response to your July 10, 2012 letter to John Duncan asking whether Pinnacle Airlines, Corp. (Pinnacle) is able to rely on the Pilot Records Improvement Act of 1996 (PRIA) records maintained by Mesaba, Colgan and Pinnacle Airlines, Inc., each of which continues to hold its own certificate. Pinnacle has integrated the pilots of these three entities under one collective bargaining agreement. Pilots will routinely transfer from one certificate to the other as the result of each vacancy award bid. Your position is that pilots currently employed at these Pinnacle entities should not be considered to be "new hires" under the PRIA for purposes of completing the certificate merger of Mesaba Airlines and Pinnacle Airlines.

In prior merger plans, the FAA has allowed for current employment records to be transferred to an acquiring carrier as part of a larger-scale merger. Pinnacle states that all records are currently maintained by the separate airlines in accordance with the requirements set forth by 49 C.F.R part 40 and will be available for inspection at a single location upon completion of the merger.

The FAA believes that the safety intent of PRIA has been satisfied by Mesaba, Colgan and Pinnacle Airlines independently. The records of the required background checks are on file and available for inspection by the FAA. Therefore, the FAA would not consider currently employed pilots at these entities to be "new hires" under PRIA and would view the Pinnacle proposal, developed as part of the merger plan, as compliant with the requirements of PRIA.

We appreciate your patience and trust that the above responds to your concerns. If you need further assistance, please contact my staff at (202) 267-3073. This letter has been prepared by Robert H. Frenzel, Manager, Operations Law Branch, Office of the Chief

Counsel and coordinated with the Air Transportation Division of Flight Standards Service.

Sincerely,

Rebecca B. MacPherson
Assistant Chief Counsel for International
Law, Legislation and Regulations, AGC-200