



Columbia Fuel Services, Inc.

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October 11, 2012

Joseph Wayland, Esq.
Office of the Assistant Attorney General
Antitrust Division
Department of Justice
Main Justice Building
Room 3109
950 Pennsylvania Avenue NW
Washington, DC 20530

Re: Request For Business Review Letter & Merger Clearance

Dear Sir or Madam,

Columbia Fuel Services, Inc. ("CFS"), and Lanmar Aviation, Inc. ("LA"), are Fixed Base Operations located at the Groton-New London Airport in Groton, Connecticut (the "Airport"). Each provides flight support services, including fueling, ramp and hangar rentals, office space rentals, and ground support to users of the Airport. Each has operated at a significant net loss for many years, since at 2008 in the case of CFS, and since 2000 in the case of LA. CFS and LA would like to combine their assets and resources at the Airport, and have the support of the Airport Sponsor, the State of Connecticut, Department of Transportation, Bureau of Aviation And Ports. Each generates annual revenues that, even when combined, represent only a mere fraction of the threshold for mandatory premerger notification set forth at 15 U.S.C. 18A, and 16 CFR, part 801. However, in light of the DOJ's position in United States v. Signature Flight Support, 1999 WL 816730 (D.D.C.), March 26, 1999, the parties thought it wise to request a DOJ business review, and submit the enclosed Memorandum in support of their joint request.

Thank you for your attention to this matter. Please do not hesitate to call or email with any questions or concerns.

Respectfully,

A handwritten signature in black ink, appearing to read "N. Burlingham".

Nicholas W. Burlingham, Esq.
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