



November 21, 2017

Mr. John Louden
California State Board of Equalization
450 N. Street
Sacramento, CA 94279

Via Email: john.louden@boe.ca.gov

RE: Interested Parties Process - 2018 Representative Period for Certificated Air Carriers and Scheduled Air Taxi Operators

Dear Mr. Louden:

This letter is in opposition to changing the representative period from January of each year to another date or dates.

The representative period is used to apportion the value of aircraft that are owned and operated on the January 1 lien date. Virgin America maintains that the representative period should be as close as possible to the lien date to ensure that the activity will most accurately reflect the aircraft being assessed. A January representative period offers the best solution as it is closer to the lien date than the alternatives.

Additionally, Staff's proposal of utilizing jet fuel sales is unreliable in measuring aircraft activity. Jet fuel is often purchased in bulk from refineries, by airlines and suppliers, for later use or for shipment via pipeline to another state. As such, the timing of these sales does not reflect aircraft activity. Fuel is also purchased by, or for, international carriers whose activity is dissimilar from domestic airlines.

Thank you for allowing us to comment on this important issue. Virgin America urges the Board to maintain the current representative period in January.

Sincerely,

A handwritten signature in blue ink that reads "Brett Weiler".

Brett Weiler
Director, Tax
Virgin America