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Docket Operations, M-30
U.S. Department of Transportation
1200 New Jersey Avenue SE
Room W12-140,
West Building Ground Floor
Washington D.C. 20590-0001

Re: *Public Comment on Withholding Certain Aircraft Registration Information from Public Dissemination*
FAA Docket No. FAA-2025-0638

Dear Sir/Madam:

These comments are submitted by Leech Tishman Nelson Hardiman, Inc. on behalf of its client, who is concerned with aviation safety, accountability, and public trust.

Thank you for the opportunity to submit this comment regarding the FAA's Request for Comment on Withholding Certain Aircraft Registration Information from Public Dissemination (Docket ID: FAA-2025-0638).

As stated in FAA guidance on reporting low-flying aircraft, "We welcome information from citizens that will enable us to take corrective measures including legal enforcement action,"¹ and public reporting plays a role in protecting "persons and property on the ground and those onboard an unauthorized low-flying aircraft."² These statements underscore the FAA's longstanding recognition that public access and reporting are integral to a safe and trusted aviation system.

Background

Section 803 of the FAA Reauthorization Act of 2024 requires the FAA to *withhold certain personally identifiable information (PII) from public dissemination for private aircraft owners upon request, including the owner's name, mailing address, telephone number, and email address*. While the purpose is to address privacy concerns, including risks such as flight-stalking or harassment, it is equally important to recognize that concerns about safety, stalking, and harassment can also arise for communities affected by aircraft operations. A balanced approach is needed—one that protects individual privacy while preserving the ability of communities to identify and address unsafe or unlawful behavior.

While the FAA must comply with Section 803's privacy requirements, the statute leaves room for agency discretion both in how that requirement is implemented and in whether additional changes to registry access are made. For example, the FAA may determine whether non-PII fields—such as ownership type, aircraft certification, or operational status—remain publicly accessible to support transparency, safety oversight, and other public interest functions. Our client urges the FAA to exercise this discretion thoughtfully and to consider the recommendations outlined in this comment to ensure that implementation maintains aviation safety, fosters community trust, and fulfills the law's intent.

Existence of Public Safety Risks from Unsafe Aviation Activity

The FAA has acknowledged the risks posed by "rogue pilots"—those who operate aircraft in disregard of regulations or with insufficient regard for public safety. In the FAA-hosted, 75-minute webinar *Dealing with the Rogue Pilot* (June

¹FAA Guide to Low-Flying Aircraft, <https://www.faa.gov/media/29701>, (accessed April 2025)

²FAA, Help FAA Identify Low-Flying Aircraft, <https://www.faa.gov/media/69176>, (accessed April 2025)

2021), officials stated: "99% versus 1%—are there some bad apples out there? Yes, there are. We've seen them." They also noted that the term "rogue pilot" could refer not only to individuals but also to "a group or organization."³

As general aviation activity continues—and increases—the potential for isolated incidents involving noncompliant or unsafe operations remains a concern. The FAA's decision to offer WINGS (pilot proficiency program) credit for the *Dealing with the Rogue Pilot* webinar underscores the importance of safety awareness and the individual responsibility each pilot holds in maintaining safety standards and supporting a culture of accountability. To reinforce these values, participants were provided with the Aviators Code of Conduct, which outlines key practices such as: "make safety the number one priority"; "seek excellence in airmanship"; "act with responsibility and courtesy"; "avoid environmentally sensitive areas"; and "mitigate aircraft noise over noise-sensitive areas."⁴

The Federal Aviation Regulations, specifically Title 14 of the Code of Federal Regulations (14 CFR) Part 91.13, prohibit careless or reckless operation of an aircraft that endangers the life or property of another. Aircraft are expected to operate safely and for legitimate navigational purposes, not in ways that create unnecessary risk to people or property on the ground. The following examples highlight incidents where low-altitude or unsafe operations raised significant community safety concerns:

- In Massachusetts, a state representative noted that following a visit to the Hanscom Field Advisory Commission to discuss "troubling" aircraft issues in her district, a flight school aircraft based at Hanscom flew over her office for the first time the next day. She also cited social media posts urging pilots to harass residents in her district.⁵
- A pilot in Schuylerville, NY was charged with stalking a woman over several years by flying his Cessna 180 at low altitudes over her home and business, at one point throwing tomatoes onto her property, and continuing flights despite a court order prohibiting him from flying.^{6 7}
- In Goodyear, Arizona, a commercial pilot and instructor tracked planes flying as low as 600 feet over his home, calling the behavior "poor piloting" and noting the aircraft were far outside standard patterns. A city councilmember later reported receiving dozens of noise complaints daily, often involving repeat sightings of the same aircraft.⁸
- In Sag Harbor, New York, a pilot was charged with reckless endangerment after flying as low as 50 feet above homes and businesses. The incident involved buzzing multiple areas and resulted in a 90-day ban from East Hampton Airport.⁹
- A Colorado resident near Centennial Airport reported online posts encouraging pilots to target specific homes, saying, "I've seen people say, 'We're going to fly over people's houses; here's the person to target'... I think I am afraid for my safety."¹⁰

³FAA Safety Team, *Dealing with the Rogue Pilot*, June 2021, <https://www.youtube.com/watch?v=IHA9Mmb2VK4>

⁴Aviators Model Code of Conduct, (accessed April 2025), <https://www.secureav.com/AMCC-v2.html>

⁵The Bedford Citizen, "Rep. Sheila Harrington Calls on HFAC and Massport to Take Stronger Action on Flight School Issues," published January 29, 2021, available at: <https://thebedfordcitizen.org/2021/01/rep-sheila-harrington-calls-on-hfac-and-massport-to-take-stronger-action-on-flight-school-issues/>

⁶Associated Press, "Pilot accused of stalking New York woman from the sky gets prison time," published March 5, 2024, available at: <https://apnews.com/article/plane-pilot-stalking-new-york-vermont-fd6db69e7d8690d0bacfae06c4f010a5>

⁷Times Union, "Schuylerville 'airplane stalker' gets 5-year prison sentence," published March 5, 2024, available at: <https://www.timesunion.com/news/article/schuylerville-airplane-stalker-gets-5-year-19763634.php>

⁸Arizona Republic, "Here's why Goodyear residents are frustrated with airport noise," published February 2, 2024, available at: https://www.azcentral.com/story/news/local/southwest-valley/2024/02/02/heres-why-goodyear-residents-are-frustrated-with-airport-noise/72261652007/?utm_source

⁹The East Hampton Star, "Low-Flying Pilot Arraigned," published May 13, 2021, available at: <https://www.easthamptonstar.com/police-courts/2021513/low-flying-pilot-arraigned>

¹⁰Denver7 News, "I think I am afraid for my safety: Woman worries she'll be targeted for bringing concerns over airport noise," published December 14, 2023, available at: https://www.denver7.com/news/local-news/i-think-i-am-afraid-for-my-safety-woman-worries-shell-be-targeted-for-bringing-concerns-over-airport-noise?fbclid=IwAR3NaK-9Et0_NwwwPy_uv6Mim3oMOUbrXHqvwWJSwZqA_aRWTbCn4AS04_aem_AQcGgsMZlvJxrpBsA6p30bCcXcX0zind706dEEuiTs0toGH9iC40KBDFsD-gp2_lwBk&mibextid=Zxz2cZ

- In coastal communities of Los Angeles and Santa Barbara, California, pilots and instructors have been reported flying below minimum safe altitudes during training and recreational flights, violating 14 CFR 91.119. The incidents have prompted public complaints and FAA scrutiny.¹¹
- In Union Star, Missouri, a student pilot fatally crashed a Cessna 172 after repeatedly buzzing homes at altitudes as low as 150 feet; witnesses reported multiple low passes, diving and climbing maneuvers before the aircraft stalled during a steep climbing turn and impacted terrain near a residence.¹²
- In Rockingham County, Virginia, a resident experienced four years of repeated drone intrusions before the operator was identified and charged with multiple counts of stalking and trespassing.¹³ The investigation involved DRONERESPONDERS, with assistance from the FAA, Virginia State Police, Virginia Department of Aviation, and other agencies, highlighting the assistance often needed to address aviation-related community safety concerns.
- In Concord, California, a pilot was arrested for violating a restraining order by repeatedly flying at low altitudes over his ex-girlfriend's home; residents also reported finding derogatory flyers on their lawns.¹⁴
- Additional incidents have been reported by community members but are not publicly detailed here due to concerns about retaliation.

Community Use of Aircraft Identification to Support Safety and Accountability

Our client agrees that protecting operator privacy is important, and shielding aircraft owners from malicious tracking or harassment has merit. However, not all access is misuse. A balanced approach must preserve limited, purpose-driven access to registration information to support safety, document risks, and enable accountability when legitimate concerns arise. Aircraft identification is often the only practical means for individuals, communities, and local authorities to understand incidents, identify patterns, and pursue appropriate resolution. As aviation activity expands, maintaining essential access will be vital to protecting public safety and sustaining trust in the aviation system.

Emerging Challenges with Advanced Air Mobility (AAM)

These challenges will become even more acute with the emergence of Advanced Air Mobility (AAM), where public trust will be critical to successful integration. AAM operations are expected to bring high-volume, low-altitude flights, frequent operations from existing airports and new, non-airport vertiports in populated areas, and overflights of communities currently and not previously exposed to aviation activity. Maintaining transparency will be essential to balance safety, privacy, and public confidence. Community access to essential information will help prevent unsafe behavior and enable timely reporting and enforcement when concerns arise. Without a clear mechanism for identification and accountability, public trust—and ultimately safe integration—may be at risk.

Public Reporting and Contact with Aircraft Operators Requires Access to Information

The FAA and other aviation resources encourage the public to report low-flying aircraft, safety concerns, and, in some cases, to contact aircraft operators directly. However, the ability to take these actions depends on access to basic identifying information about the aircraft and its owner or operator. Without such access, the public's ability to contribute to aviation safety, accountability, and community responsiveness is limited.

Examples where the public is asked to report concerns or contact operators include:

- FAA guidance includes the operator's identity among the "desired information" the public is asked to provide when reporting low-flying aircraft incidents.¹⁵

¹¹FAA Safety Team, *Southern California Minimum Safe Altitude Violations Notice*, Notice No. NOTC3160, 2024, <https://www.faa.gov/spans/noticeView.aspx?nid=14361>

¹²AOPA website (accessed April 2025), <https://www.aopa.org/training-and-safety/air-safety-institute/accident-analysis/featured-accidents/lethal-lesson#:~:text=At%20approximately%203%20p.m.%2C%20however%2C%20the%20Skyhawk,homeowner%20stated%20that%20the%20airplane%20circled%20h>

¹³WHSV, "Drone stalking victim speaks out about fears, frustration and finding a solution," published December 13, 2024, available at: <https://www.wHSV.com/2024/12/13/drone-stalking-victim-speaks-out-about-fears-frustration-finding-solution/>

¹⁴ABC7 News, "Pilot arrested who stalked ex with flyovers," published September 24, 2009, available at: https://abc7news.com/archive/7030786/?utm_source

¹⁵FAA, Help FAA Identify Low-Flying Aircraft, <https://www.faa.gov/media/69176>, (accessed April 2025)

- For helicopter noise concerns, the FAA advises: “You should contact the helicopter operator directly for information regarding the helicopter operations you are experiencing.”¹⁶
- The FAA’s Hotline, used to report aviation safety concerns or issues involving FAA personnel and facilities, requests information about the individual, company, or organization responsible for the reported activity or event, including their name, contact information, and company affiliation if applicable.¹⁷
- Legal guidance encourages individuals to contact the aircraft operator to seek resolution before pursuing formal legal action.¹⁸

Public Need for Operator Information to Support Safety, Accountability, and Resolution

Due Diligence and Public Reporting

Members of the public seek to perform basic due diligence on pilot qualifications and airworthiness of aircraft — whether observing flights overhead or considering aviation services they may use—particularly in light of incidents where questions were raised about qualifications and compliance, such as the 2019 Hawaii air tour crash, and ongoing concerns about illegal charter operations highlighted by initiatives like the Air Charter Association’s *Fly Legal Day*.¹⁹ Colorado has state statutes that make it illegal for anyone in the state to possess or operate an aircraft that is registered to a nonexistent person or entity, or to an entity that is no longer a legal entity.²⁰

Need for Aircraft Information to Identify the Correct FSDO

Members of the public are directed to report concerns to their local Flight Standards District Office (FSDO) but must first have key information about the aircraft and operator to do so effectively. Identifying the aircraft’s registration state is necessary to determine which FSDO has jurisdiction. However, the registration state alone may not always lead to the appropriate FSDO, because aircraft—especially those operated by flight schools or leased operators—may be based in a different state from where they are registered. Knowing the aircraft’s N-number, the operator’s name, and the type of operation helps ensure that the report reaches the correct office and can be accurately evaluated.

Airport Notification Programs

Some airports have strong programs to notify flight schools or pilots about community concerns, helping to address noise complaints and safety issues proactively. However, notification practices are not consistent across airports, and some may not inform operators at all. Public meetings such as airport commission meetings or roundtables often do not include flight school representatives, limiting community engagement. Where formal channels are limited, access to contact information is important to facilitate communication between communities and aircraft operators or owners regarding noise complaints or safety concerns.

Law Enforcement and Future AAM Integration

In certain cases, such as incidents involving stalking or other unlawful low-flight behavior, local law enforcement may need access to aircraft ownership information to support investigations. Law enforcement agencies are already tasked with enforcing regulations related to drones and increasingly use drones in public safety operations. Similar access to aircraft information will likely be necessary as Advanced Air Mobility (AAM) operations are introduced and scale to high-volume, low-altitude activity across communities.

Legal Resolution Needs

In certain cases, legal representatives may need access to aircraft ownership information to assist clients in addressing incidents involving low-flying aircraft, property impacts, or other safety-related concerns. Access to accurate operator information can support informal resolution efforts or, if necessary, formal legal proceedings.

¹⁶https://www.faa.gov/air_traffic/noise_emissions/noise_complaints/, (accessed April 2025)

¹⁷https://www.faa.gov/about/office_org/headquarters_offices/aae/programs_services/faq_hotlines, (accessed April 2025)

¹⁸American Bar Association, Section of Dispute Resolution. *What is Dispute Resolution?* Available at: https://www.americanbar.org/groups/dispute_resolution/resources/DisputeResolutionProcesses/

¹⁹<https://www.ainonline.com/aviation-news/business-aviation/2025-01-20/aca-urges-vigilance-over-illegal-charter-flights>, (accessed April 2025)

²⁰Colo. Rev. Stat. § 43-10-114(3)

Airport Fly Quiet and Noise Abatement Programs

Airports require access to aircraft operator information to manage Fly Quiet programs and other noise abatement efforts. Some programs are voluntary, while others include mandatory compliance measures tied to grandfathered pre-ANCA agreements or settlement terms. As part of these efforts, airports may track and post information about non-compliance, including the number of operations, tail number, company name, contact information, and the nature of the violation. Non-compliance is often reviewed directly with operators and, in some cases, discussed at airport commission meetings or roundtables that include public participation. Airports may also publish detailed reports, document follow-up actions, and hold meetings with pilots and operators to encourage adherence to curfews, procedures, and other noise mitigation measures.

Impact of Section 803 Rule Changes on Public Safety, Accountability, and Community Engagement

While the examples above demonstrate the many ways that access to aircraft operator information currently supports aviation safety, public accountability, and local community engagement, the implementation of Section 803 may limit access to information that is essential for these functions. If operator information is withheld or suppressed without maintaining sufficient transparency, it could prevent the public, local governments, law enforcement, legal representatives, and airports from fulfilling the roles they are currently encouraged or required to perform. As a result, efforts to support public safety, accountability, and informal resolution of aviation-related concerns could be diminished, and community trust could be undermined.

Recommendations for Implementation: Balance Privacy with Conditional Access

To align implementation of Section 803 with the FAA's responsibilities for safety, transparency, and stakeholder trust, our client urges the FAA to exercise its discretion thoughtfully and consider the recommendations outlined below. These recommendations are designed to comply with Section 803's privacy requirements while ensuring that essential information remains available to support public safety, accountability, and community engagement.

1. Limit Public Access to Contact Information While Providing Conditional Access

Our client supports limiting public dissemination on the FAA's website of personal contact information, specifically *email addresses and telephone numbers*. However, conditional access to this information should remain available to authorized parties, such as airports, government agencies, and other recognized stakeholders, to facilitate necessary safety, legal, or operational communications.

2. Require a Non-Personal Contact Channel for Communication

As part of the pilot information suppression process to protect privacy, require aircraft owners to provide non-personal contact information, made publicly available on the FAA's website, that enables appropriate communication without disclosing private identity details. Specifically, owners should be required to:

- Provide, for public display on the FAA's website, a mailing address or email address that enables communication with the aircraft owner or operator but does not require disclosure of personal identity, affiliation, or private address information (for example, a PO Box or neutral email address); or
- Agree to use a third-party forwarding service managed independently (not operated by the FAA).

Maintaining non-personal contact information supports aviation safety, enables collaborative resolution of issues where possible, and promotes constructive engagement between operators and the communities they affect — while protecting individual privacy and minimizing administrative burden on the FAA.

3. Preserve Essential Public Aircraft Information and Provide Conditional Access to Withheld Data

Preserve Essential Aircraft Information on the FAA's Website:

Building on the provision of non-personal contact information, our client supports preserving public access to essential aircraft details, including the *N-number and aircraft description (e.g., model, type, manufacturer year, certificate issue date and expiration date)*. Maintaining public disclosure of this minimal set of information on the FAA's website is critical for the public to understand and monitor aviation activity affecting their communities, to

identify aircraft overflying residences or other spaces, and to support aviation safety, accountability, and engagement efforts.

Provide Conditional Access:

Where personally identifiable information (PII)—specifically the *owner's name and mailing address*—is withheld from public disclosure on the FAA's website under the specific requirements of Section 803 of the FAA Reauthorization Act of 2024, our client recommends that the FAA clearly reference these statutory limits in its public-facing materials and establish mechanisms to ensure *conditional access* remains available when authorized to protect public safety, support legal due process, and maintain public trust. Specifically:

- **Authorized Request Process**

Create a formal mechanism that allows parties authorized by the FAA to request either *continuous or case-specific access* to personally identifiable information (PII) withheld from public disclosure on the FAA's website, through a secure process, depending on the nature of their role and demonstrated need. Access should be subject to clearly defined thresholds such as:

- Documented safety complaints,
- Verified safety incidents or repeat violations,
- Civil legal proceedings,
- Requests from federal, state, or local agencies conducting safety or noise investigations, or
- Public agency activities or organized community engagement related to aviation safety or environmental impacts (such as noise abatement or Fly Quiet programs).

This request system could be integrated into the FAA's CARES platform, modeled after FOIA processes but streamlined to address aviation safety and community needs. The process should require the FAA to respond within 30 calendar days of receiving a request and allow for administrative appeal if no timely decision is made. This approach preserves privacy protections for routine matters while ensuring that essential information remains available when safety, accountability, or legal needs arise.

4. Clarify the Scope of Section 803 and Permit Conditional Access for Authorized Parties

Emphasize in FAA rulemaking and guidance that Section 803:

- Limits public disclosure on the FAA's website of personally identifiable information (PII)—specifically the owner's name, mailing address, telephone number, and email address—but does not prohibit disclosure under FOIA where legally justified;
- Does not restrict FAA use of registration data for enforcement, certification, safety oversight, or other official functions;
- Does not preclude sharing information with state, local, or tribal agencies, or with airports conducting legitimate aviation-related investigations, safety initiatives, or noise abatement efforts; and
- Allows for the development of conditional access processes that permit FAA-authorized parties to request withheld PII under clearly defined thresholds related to safety, legal, and community engagement needs.

Clear public guidance will help prevent misinterpretation of Section 803 that could otherwise unnecessarily limit transparency, enforcement, public accountability, or community responsiveness.

5. Tailor Transparency and Accountability Rules for AAM Operations

Given the anticipated application of Section 803 to AAM, our client recommends that the FAA establish specific transparency and accountability rules tailored to AAM operations. At a minimum, these rules should incorporate the principles reflected in Recommendations 1 through 4. However, due to the operational characteristics of AAM—including widespread low-altitude activity, high-frequency flights, use of remotely piloted or autonomous aircraft, and operations across both FAA-controlled and uncontrolled airspace—*additional information disclosure and accountability measures will be necessary* to maintain public trust and safety.

To address these challenges, tailored rules should:

- Ensure communities have access to basic identifying information about AAM operators and can use identifying data, such as ADS-B, to initiate concerns or investigations, given that N-numbers may be difficult or impossible to observe visually;
- Provide residents with a clear process for reporting safety concerns; and
- Support reliable mechanisms for follow-up, resolution, and regulatory oversight.

This will be particularly important as communities consider approving vertiport sites, especially at non-airport locations subject to local zoning authority. Local governments and residents will expect clear assurances about transparency, accountability, and safety protections before supporting these projects.

Proactively addressing these transparency needs will be critical to supporting safe integration and ensuring that emerging aviation technologies are welcomed rather than resisted by the communities they impact.

Additional Consideration: Why Aircraft Registration and Privacy Cannot Be Compared to Automobiles

Additionally, some have suggested that aircraft registration information should be treated like automobile license plates, noting that a car's license plate does not publicly disclose the owner's name or contact information. However, this comparison overlooks fundamental differences between aviation operations and automobile use, particularly the challenges of identifying aircraft during unsafe behavior and the higher-consequence public safety risks associated with aviation activities.

Potential for Ground Harm Without Damage to the Aircraft:

An automobile involved in unsafe or reckless behavior typically sustains visible damage in the event of a collision or unsafe act. By contrast, a pilot can cause significant disruption, low-altitude risks, or psychological harassment to individuals on the ground without any impact to the aircraft itself — making outside identification even more critical.

Visibility:

Automobile license plates are readily observable at close range—often just a few feet away—on publicly accessible roads and highways. In contrast, aircraft registration numbers (N-numbers) are placed on the sides and tail surfaces of the aircraft, rather than on the underside, making them difficult to see from the ground.

Use of Public Airspace vs. Public Roadways:

Pilots operate in shared public airspace—a national resource regulated by the federal government—and often overfly private property, homes, and sensitive areas without landowner consent, creating different risks and exposure for residents. In contrast, automobile drivers operate primarily on public roadways specifically designated for vehicle travel, with known and managed points of access.

- **Altitude Restrictions:** Under FAR 91.119, aircraft generally must not operate below 500 feet over unoccupied areas and 1,000 feet over congested areas or open-air assemblies (with a 2,000-foot horizontal buffer), except during takeoff, landing, or when necessary for safety.
- **Pilot Authority vs. Driver Regulation:** Aircraft in flight are governed by the pilot in command's (PIC's) judgment, with the authority to exercise discretion—including limited deviation from certain regulations if necessary for immediate safety. In contrast, automobile drivers must adhere to traffic laws, with very limited ability to override rules based on individual judgment, even in unusual conditions.
- **Enforcement Differences:** Violations of aviation regulations are evaluated and enforced by local FAA Flight Standards District Offices (FSDOs), where penalties are discretionary, and outcomes can vary depending on the circumstances. In contrast, serious motor vehicle infractions—especially those involving accidents or public safety risks—trigger mandatory reporting and legal consequences, with far less discretion available once an event occurs.

Accountability Across Jurisdictions and Remote Operations

An automobile is usually within the visual range and enforcement jurisdiction of local law enforcement authorities. Aircraft operate over large distances, crossing multiple jurisdictions and often beyond the immediate oversight of any single local authority. In such cases, identification through registration information becomes the only practical way to ensure accountability when incidents involving unsafe behavior occur.

Greater Consequences from Aviation-Related Unsafe Behavior:

Aviation-related unsafe behavior can affect thousands of people simultaneously across wide areas. Reckless or harassing flights at low altitude can trigger public safety responses, disrupt communities, and in rare cases, risk serious injury without visible signs of aircraft malfunction or distress.

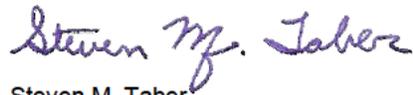
Given the distinctions between aviation and automobile operations, preserving access to basic aircraft identification and enabling conditional access to withhold personally identifiable information are critical steps to uphold aviation safety, ensure community accountability, and maintain public trust. Equating aircraft registration and automobile license plate privacy does not fully reflect the unique risks, regulatory frameworks, and operational realities of aviation.

Closing

Thank you for considering these comments. Our client respectfully urges the FAA to implement Section 803 in a manner that both fulfills the statute's privacy requirements and preserves essential access to support aviation safety, public accountability, and community trust. *The recommendations outlined in this comment—particularly Recommendations 1 through 4—are consistent with Section 803's requirements and recognize the FAA's discretion in how the statute is interpreted and applied.* Our client believes that structured, conditional access to aircraft ownership information remains critical to ensuring a safe, transparent, and trusted national airspace system for all.

Very truly yours,

LEECH TISHMAN NELSON HARDIMAN, INC.



Steven M. Taber