



April 10, 2026

Via Electronic Mail

The Honorable Jon Kosnick, Co-Chair
Committee on Transportation Finance
and Policy
Minnesota House of Representatives
St. Paul, MN 55155

The Honorable Brad Tabke, Co-Chair
Committee on Transportation Finance
and Policy
Minnesota House of Representatives
St. Paul, MN 55155

RE: Opposition to HF 4180

Dear Co-Chair Koznick and Co-Chair Tabke,

On behalf of the National Air Transportation Association (NATA), I write to express concern about HF 4180, legislation that seeks to govern air carrier operations, airport access, and aeronautical services for the air transportation of detained individuals. Because HF 4180 is pre-empted by federal law and would impose an undue burden on our Minnesota membership, NATA respectfully opposes any Committee action to advance it.

NATA represents fixed base operators (FBOs), FAA-certified air charter operators, general aviation airport sponsors, and other aviation businesses operating at more than 3,700 domestic and international locations. Our member companies provide a broad range of aeronautical services, including aircraft fueling, ground support, parking, and storage; passenger and crew services; and aircraft maintenance, overhaul, and parts sales. In Minnesota, NATA's members provide FBO services at 12 locations.

Federal preemption over air carrier operations and airport access in the National Airspace System is well established through federal law, legal precedent, and Federal Aviation Administration (FAA) grant obligations; however, HF 4180 would violate this preemption on multiple fronts. First, the legislation seeks to regulate commercial airline and charter operators by requiring air carriers to gather and maintain personal information on passengers, by dictating the treatment of passengers, and by controlling aircraft services such as fueling. Such regulation of air carrier services by a state is expressly prohibited by the Airline Deregulation Act of 1978 and has been upheld in federal court.¹

Second, HF 4180 would restrict aeronautical access at Minnesota airports by requiring air carrier compliance with state regulations as a condition of receiving services. Airports that accept federal funding through the FAA's Airport Improvement Program (AIP) are bound by a

¹ See 14 U.S.C. § 41713. Preemption of authority over prices, routes, and services.



series of obligations.² *FAA Grant Assurance 22: Economic Nondiscrimination* compels airport sponsors and their contractors to make services available to all types and classes of airport users, prohibits them from discriminating against any air carrier, and requires comparable rules, regulations, and conditions for each air carrier. *FAA Grant Assurance 27: Use by Government Aircraft* requires airport sponsors to make all facilities available for use by government aircraft. By imposing discriminatory rules for air carriers based on their passengers and by requiring FBOs to confirm compliance before providing aeronautical services, HF 4180 would put federally obligated airports in violation of Grant Assurance 22. Similarly, demanding government aircraft comply with state regulations as a condition of receiving services would violate Grant Assurance 27.

Lastly, HF 4180 would place an undue burden on FBOs by requiring them to judge the purpose of an operation and the status of persons on board; determine their compliance with state regulations in conflict with federal law; and compile, store, and transmit personally identifiable information. Employees on an FBO ramp are trained to provide safe aircraft positioning, fueling, and other standard ground-handling services to all aircraft operators, but they have no way of ascertaining the status of passengers or the nature of their travel. FBO management has no authority to require aircraft operators to disclose the purpose of a flight nor to demand personally identifiable passenger information, while air carrier and government aircraft operators have no obligation to respond to such requests. In addition, the documentation required of FBOs in HF 4180 imposes the creation of a long-term, secure recordkeeping system to include storage and transmittal of sensitive personal and medical information protected by HIPAA, raising significant questions about liability.

Thank you for your careful consideration of NATA's concerns about HF 4180. We welcome the opportunity to supply further details or answer questions.

Sincerely,

Karen Huggard
Vice President of Government Affairs

CC: Members of the Minnesota House Committee on Transportation Finance and Policy

² See Federal Aviation Administration. *Airport Improvement Program Grant Assurances for Airport Sponsors*. https://www.faa.gov/airports/aip/grant_assurances/assurances-airport-sponsors-2025.