

CERTIFIED SERVICE PROVIDER PROGRAM (CSPP) REQUIREMENTS

INTRODUCTION

Los Angeles World Airports' ("LAWA") Certified Service Provider Program ("CSPP" or "Program") establishes minimum requirements for companies that provide certain services to airlines, airline consortiums, or other aviation customers at Los Angeles International Airport (LAX). The purpose of the Program is to establish:

- eligibility criteria
- minimum qualifications
- service classifications
- standards and conditions
- emergency response training for LAX employees
- procedures for monitoring and enforcing program compliance
- processes for decertification of service providers not complying with the Program

This document provides requirements and standards governing the CSPP established and approved by the Board of Airport Commissioners.

Any service provider seeking to provide a CSPP regulated service must meet eligibility criteria. To participate in CSPP, a service provider must submit an application package to Los Angeles World Airports (LAWA). Once LAWA staff determines that a service provider meets or exceeds the CSPP's established minimum qualifications and the service provider completes the enrollment process, LAWA will issue a Certified Service Provider License Agreement (CSPLA) and is thereby designated as a Certified Service Provider (CSP).

CSPs must adhere to the Program requirements throughout the term of their CSPLA. If a CSP violates any of the provisions of the Program requirements or fails to comply with any of the terms of their CSPLA, LAWA has the right to require corrective actions and to impose penalties up to and including termination of a service provider's CSPLA.

For additional information, templates and forms related to the CSPP and CSPLA application, please visit the CSPP website at: www.lawa.org/cspp

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SECTION 1. CSPP CLASSIFICATIONS

CSPP regulated services are divided into Core and Limited Services classifications. Each classification has different qualification requirements.

1.1. Core Services Classifications - Consolidated Core Services

There are two Consolidated Core Services classifications: a) Passenger Services, and b) Ramp Services. In order to be certified to provide either of the two Consolidated Core Services, a service provider must meet the minimum experience requirement and demonstrate they have the capacity to perform all of the required services within each classification.

- 1.1.1. Passenger Services
 - 1.1.1.1. Baggage Sorting Management Services
 - 1.1.1.2. Wheelchair Services
- 1.1.2. Ramp Services
 - 1.1.2.1. Ramp Baggage Handling Services
 - 1.1.2.2. Aircraft Cooling and Heating Services
 - 1.1.2.3. Aircraft Loading and Unloading Services

Consolidated Core Service - Passenger*		Applicable Qualifications		
Service Categories	Sample Tasks	Experience	Capacity	Space/ Facilities
<u>Baggage Sorting and Management</u>	<ul style="list-style-type: none"> • Monitor/control baggage after TSA performs security search • Monitor carry-on baggage for conformance to security and airport policies • Move bags within terminal tagged by manual or automated bag tag system • Move odd-sized baggage • Report bags/items left in claim area to appropriate airline representative • Positive claim check verification-baggage claim security • Report any baggage or other item left within the claim area to appropriate airline representatives or authority • Interline Baggage Transfer 	Yes	Yes	Yes
<u>Wheelchair Services</u>	<ul style="list-style-type: none"> • Provide personnel, equip., to assist passengers with reduced mobility • Secure baggage in bag claim area 	Yes	Yes	Yes

***A service provider must demonstrate capability in both Baggage Sorting and Management and Wheelchair Services in order to receive a CSPLA to provide Passenger Services.**

Consolidated Core Service - Ramp*		Applicable Qualifications		
Service Categories	Sample Tasks	Experience	Capacity	Space/ Facilities
<u>Baggage Handling</u>	<ul style="list-style-type: none"> Monitor and control baggage in preparation for, and after, TSA performs a security search and ensures all bags have passed security screening Handle baggage in sorting area Prepare and deliver bags onto aircraft Establish number and/or weight of baggage Load or offload bags to or from aircraft Prioritize and deliver bags to claim area Interline Baggage Transfer 	Yes	Yes	Yes
<u>Aircraft Cooling/Heating</u>	<ul style="list-style-type: none"> Arrange for aircraft cooling and heating 	Yes	Yes	Yes
<u>Aircraft Loading/Unloading</u>	<ul style="list-style-type: none"> Provide/arrange for loading and unloading Provide chocks and landing gear locks Provide engine blanking covers Safeguard loads during transport and during off-loading and loading of aircraft Provide tail stands Arrange for ground power 	Yes	Yes	Yes
<i>*A service provider must demonstrate capability in Baggage Handling, Aircraft Cooling/Heating, and Aircraft Loading and Unloading Services in order to receive a CSPLA to provide Ramp Services.</i>				

Core Services

The following three services are stand-alone Core Services. In order to be certified to provide any of these services, a service provider must demonstrate they have the capacity in the service category for which they are applying.

- 1.1.3. Interior Aircraft Cleaning Services
- 1.1.4. Security Services
- 1.1.5. Into-Plane Fueling

Service Categories	Sample Tasks	Applicable Qualifications		
		Experience	Capacity	Space/ Facilities
Interior Aircraft Cleaning	<ul style="list-style-type: none"> Clean passenger and crew compartments Clean cabin windows Clean cargo compartments Change, fold, and/or stow blankets, pillows, etc. Collect and/or distribute supplies for lavatories and cabin Disinfect and deodorize cabin Remove food and material leftovers Provide or arrange for laundering of cabin blankets 	Yes	Yes	Yes
Security	<ul style="list-style-type: none"> Aircraft security and search Performs security search of aircraft 	Yes	Yes	Yes

	<ul style="list-style-type: none"> • Cargo Security • Identification verification • Security screening • Provide or arrange for control of access to aircraft and/or designated and restricted areas • Guards designated areas • Safeguards all loads during transport between aircraft and designated locations during off-loading and loading of aircraft 			
Into-plane Fueling	<ul style="list-style-type: none"> • Transferring fuel below ground from a fuel hydrant system through a fuel hydrant vehicle into an airplane. • Transferring fuel from a tanker truck into an airplane. 	Yes	Yes	Yes

1.2. Limited Services Classification

The following four services are Limited Services:

- 1.2.1. Terminal Services
- 1.2.2. Maintenance Services - Aeronautical
- 1.2.3. Cargo – Passenger & Freight Aircraft Services
- 1.2.4. Food Services

In order to be certified to provide any of the services in this classification, a service provider must demonstrate that they have the capacity in the service category for which they are applying.

Service Category	Sample Tasks	Applicable Qualifications		
		Experience	Capacity	Space/ Facilities
Terminal	<ul style="list-style-type: none"> • Acts as agent for airlines and interacts with their passengers • Hosting services • Passenger check-in • Queue management • Skycap services • Passenger ticketing • VIP meet-and-assist • Establish number and/or baggage weight • Interline Baggage Transfer 	No	Yes	Yes
Aeronautical Maintenance	<ul style="list-style-type: none"> • Aircraft cargo container repairs/cleaning • Aircraft communication install and maintain • Aircraft engine washing • Aircraft fuel tank repairs • Aircraft maintenance/servicing • Wet or dry wash exterior aircraft • Provide engine blanking covers • Aircraft service equipment maintenance 	No	Yes	Yes

Cargo – Passenger/Freight Aircraft	<ul style="list-style-type: none"> • Ramp transfer to and from passenger aircraft • Cargo Warehousing • Cargo document handling • Dangerous goods handling • Customs brokerage, • Freight forwarding • Mail handling, sorting and distribution 	No	Yes	Yes
Food Services	<ul style="list-style-type: none"> • Delivery of prepared food and/or beverage to or for aircraft • Preparation of food and/or beverage to or for aircraft • Conduct security and/or inspection services for food and/or beverage to or for aircraft • Provide any service related to/in connection with preparation of food and/or beverage to/for any aircraft 	No	Yes	No

1.3. Exclusions to CSPP

1.3.1. Any air carrier (an “Exempt Air Carrier”) operating from a facility at LAX pursuant to (i) a lease with LAWA, (ii) a sublease approved by LAWA, (iii) the Los Angeles International Airport Passenger Terminal Tariff or (iv) an LAX Non-Terminal Facilities Use Terms and Conditions (UTC) instrument (the Exempt Air Carrier’s space pursuant to such instrument “Operations Base”) is not required to secure a CSPLA to provide CSPP services in the following circumstances:

1.3.1.1. When providing services at the Operations Base to a parent company

1.3.1.2. When providing services at the Operations Base to a subsidiary company

1.3.1.3. When providing services at the Operations Base to an air carrier that has the same parent company as the Exempt Air Carrier

1.3.1.4. When providing services to a LAWA-approved subtenant at the Operations Base

1.3.1.5. When providing services at the Operations Base for flights operated by another air carrier operating exclusive code-share flights for the Exempt Air Carrier

1.3.1.6. When providing services at the Operations Base for flights jointly operated with another air carrier or whereby the Exempt Air Carrier and the other air carrier have a joint financial interest in such flights

1.3.1.7. For arriving international flights gated at a different terminal than the Operations Base due to the requirements or limitations of United States Customs and Border Protection for any of the circumstances identified in Sections 1.3.1 through 1.3.6 inclusive.

1.3.1.8. When providing on-call, non-routine, aircraft maintenance services from its Operations Base or another air carrier's Operations Base to any airline.

1.3.2. LAWA Concessionaires providing food and/or beverage services to airline lounges and/or consortiums at LAX, including companies providing food and/or beverage delivery services landside at LAX, are not required to secure a CSPLA.

1.3.3. CSPP will apply to Fixed Base Operators (FBO) only if an FBO provides services outside their premises.

SECTION 2. MINIMUM QUALIFICATIONS

2.1. Eligibility Criteria

2.1.1. Agreement requirement.

To be eligible to participate in CSPP a service provider must have:

2.1.1.1. A contract with an airline/CSP client, or

2.1.1.2. A conditional agreement with an airline/CSP client where the only condition therein is the securing of a CSPLA from LAWA.

2.1.2. Space or lease requirement

A service provider must demonstrate it has the ability to secure appropriate operational space at LAX through:

2.1.2.1. A current or pending LAWA approved lease/consent to sublease, Tariff Letter, or Use and Terms Conditions (UTC) Agreement.¹

2.1.2.2. A Space Authorization Agreement (SAA) signed by the service provider and master tenant leaseholder at LAX.

2.2. Subcontracting Limitations:

A service provider must demonstrate qualification for certification on its own merit and resources and cannot demonstrate such qualification through a subcontract for services within their services categories. However, once certified, a service provider may subcontract with another certified provider.

2.3. Core Services – to be certified:

¹ Food Service Companies are not required to secure lease or sublease space at LAX.

2.3.1. Through the Letter of Verification, an airline/CSP client must confirm a service provider's capacity to perform the services they are being contracted to provide.

2.3.2. A service provider must demonstrate a record evidencing successful general operating experience for at least three (3) of the last five (5) years at a large hub airport² in the United States or airports outside of the United States that are of similar size to large hub airports.

2.3.3. A service provider must identify adequate property/facilities to carry out their services through a lease, tariff letter, or UTC letter directly through LAWA or through a LAWA-approved consent to sublease.

2.3.3.1. A service provider may submit a copy of Sublease Agreement or Sublease Confirmation Letter from their LAX airline/CSP client to initiate the LAWA consent to sublease process.

2.4. Limited Services – to be certified:

2.4.1. Through the Letter of Verification, an airline/CSP client must confirm a service provider's capacity to perform the services they are being contracted to provide.

2.4.2. A service provider must identify adequate property/facilities to carry out their services through a lease, tariff letter, or UTC letter directly through LAWA or through a LAWA-approved consent to sublease. A service provider within the Food Service category is exempt from this requirement.

2.4.2.1. A service provider may submit a copy of a SAA from their LAX airline/CSP client to confirm adequate space and authorization to operate on their leasehold at LAX.

SECTION 3. MINIMUM STANDARDS

Once designated as a CSP, the CSP must adhere to the following Minimum Standards.

3.1. Rules & Regulations

CSPs must comply with safety and security requirements published in the Rules and Regulations Manual for Los Angeles International Airport (LAX). The Rules and Regulations Manual for LAX is published under authority contained in Sections 632(b) and 633(a) and (b) of the Los Angeles City Charter.

The Federal Aviation Administration (FAA), the Transportation Security Administration (TSA) and, U.S. Customs and Border Protection (if applicable) have issued Federal Aviation Regulation (FAR) Part 139 and Transportation

² "Large hub airport" as defined by the Federal Aviation Administration (see http://www.faa.gov/airports/planning_capacity/passenger_allcargo_stats/)

Security Regulation (TSR) Part 1540 and 1542, which requires Airport management to establish operational and safety procedures and institute certain security measures to meet FAA and TSA requirements for airport certification.

LAX Airport Rules and Regulations can be found at:
<https://www.lawa.org/en/rules-and-regulations/lax-rules-and-regulations>

3.2. Airport Safety

CSPs must comply with all applicable requirements and procedures as defined in the LAX Security and Airfield Enforcement Program (SAFE). The SAFE Program is an awareness and enforcement program. Corrective actions and penalties for violations will be determined by the SAFE program's point system.

The SAFE Program does not limit, supersede, or replace any other laws, rules or regulations. Additional details can be found at:

<https://www.lawa.org/en/lawa-security-badge-office/applicants/safe-program>

3.3. Emergency Response Procedure Awareness

An emergency situation is defined as any event that threatens, or has the potential to threaten the life, health, and/or safety of individuals or property at LAX. Each CSP must designate a person(s) available 24 hours a day as the emergency contact. In addition to the emergency contact information, the CSP is required to familiarize their employees with the emergency response notification process and evacuation plans to support LAWA and all operations at LAX.

3.4. Equipment and Motor Vehicles

3.4.1. CSPs are responsible for appropriately storing, parking, maintaining, and monitoring equipment and motor vehicles.

3.4.2. CSPs shall only operate their company-owned equipment and vehicles unless there is a written agreement with another airline/service provider authorizing the use of their equipment and/or vehicles. A copy of the signed agreement and Company Authorization Letter must be submitted to LAWA.

3.4.3. All equipment and motor vehicles must be in compliance with the LAX Rules and Regulations and must display the CSP's name and a unique equipment identification number.

3.4.4. A list of all equipment and motor vehicles must be provided to LAWA which includes the vehicle/equipment type and its corresponding identification number. LAWA must be notified of any changes within 30 days.

3.4.5. All equipment and motor vehicles must also be labeled with a LAWA issued CSPP-decal. Unregistered or unlabeled vehicles and/or equipment will be subject to impound and the vehicle/equipment owner will be responsible for associated fees or charges.

3.4.6. All new or replacement equipment and motor vehicles that are brought onto LAX must be less than five (5) years old and in good working condition. If a

CSP has completely rebuilt and refurbished an older piece of equipment or motor vehicle to add to their fleet inventory at LAX, they must maintain a record of paperwork verifying the repairs and refurbishing work done on the unit and provide it to LAWA upon request.

3.4.7. All equipment and motor vehicles that are not in use must be properly staged or stored in CSP's designated areas through a LAWA-approved lease, sublease, Tariff Letter, UTC, or with written approval from the airline/CSP client a CSP is serving. All salvaged, abandoned and/or inoperable equipment and vehicles must be removed from the airfield at LAX.

3.4.8. All containers shall be properly labeled with respect to contents and in compliance with the California Uniform Fire Code (CFC), Article 80.

3.4.9. All equipment and motor vehicle maintenance files must be retained for LAWA inspection for one (1) year and submitted to LAWA upon request.

3.4.10. Equipment or vehicles must be inspected by thoroughly trained and qualified personnel prior to use, including pre and post—trip inspections.

3.4.11. When applicable, CSPs must comply with the Alternative Fuel Vehicle Requirement Program at LAX. Please refer to the Alternative Fuel Vehicle Requirement Program for more information at the LAX Environmental Services website at: <https://www.lawa.org/en/lawa-environment/lax/lax-alternative-fuel-vehicle-requirement-program>

3.5. Personnel and Training Requirements

3.5.1. Minimum Staffing

CSPs must provide an adequate number of thoroughly trained and qualified and, where applicable, licensed employees and supervisors on duty to meet the contracting airline/CSP client's obligations.

3.5.2. Use of Passenger Facilities

CSP personnel must take all breaks in areas designated by the CSP or the CSP's airline/CSP client. Public airport areas are primarily for use by passengers and/or customers.

3.5.3. Employee Attire and Identification

CSPs employees must be appropriately attired for their position and job duties. If a uniform is required, it shall identify the name of the CSP or client. All personnel shall display LAWA-issued security credentials in a conspicuous manner at all times.

3.5.4. Training

CSPs must establish a written training program to ensure that all employees are thoroughly trained and qualified to perform their job duties, including all applicable airport emergency preparedness, evacuation, and first aid procedures. The training program must contain detailed instruction in job duty requirements

for each job classification. Employees who use equipment must be trained and certified by the CSP in the operation of every piece of equipment they will use. Training programs will be updated to reflect changes in scope of work, operational procedures, equipment, etc. Training syllabi, records of completion, and a list of all employees on a CSPs payroll shall be provided to LAWA on an annual basis and as requested by LAWA.

Training must include, at minimum, a review of: LAX Rules and Regulations, safety and security including Rules and Guidelines from the Transportation Security Administration, U.S. Customs and Border Protection (if applicable) and LAWA Airport Police. In addition, as applicable, training should include airport familiarization, emergency notifications, waste disposal, proper handling of Dangerous Goods and Hazardous materials, and federally-mandated training regarding transporting people with disabilities.

3.5.5. CSPs are required to establish an employee paid release time policy to provide 16 hours of Emergency Preparedness Training (EPT) on an annual basis to ensure employees of airport contractors can appropriately react to a hazard and assist during an emergency. EPT shall be provided to new employees within 120 days of hiring.

3.5.6. Customer Service

CSPs employees are expected to assist courteously and direct the public when necessary.

3.6. Labor Harmony

CSPs covenant that their employees at LAX shall be able to work in labor harmony in order to protect LAWA's proprietary and economic interests. In order to comply with this provision:

3.6.1 CSPs shall have in place, at all required times, a labor peace agreement ("Labor Peace Agreement") with any organization of any kind, or an agency or employee representation committee or plan, in which employees participate and which exists for the purpose, in whole or in part, of dealing with service providers at LAX concerning grievances, labor disputes, wages, rates of pay, hours of employment, or conditions of work ("Labor Organization"), which requests a Labor Peace Agreement.

3.6.2 The Labor Peace Agreement shall include a binding and enforceable provision(s) prohibiting the Labor Organization and its members from engaging in picketing, work stoppages, boycotts, or any other economic interference for the duration of the Labor Peace Agreement, which must include the entire term of any CSPLA.

3.6.3 All CSPs shall, upon LAWA's request, submit to LAWA a certification, signed by the CSP and any Labor Organizations, indicating the parties have entered into a Labor Peace Agreement.

3.6.4 In the event that a CSP and a Labor Organization are unable to agree to a Labor Peace Agreement within 60 days of the Labor Organization's written request, they shall submit the dispute to a mutually agreed upon mediator to assist the parties in reaching a reasonable Labor Peace Agreement. In the event that the CSP and a Labor Organization are unable to reach a reasonable, Labor Peace Agreement through mediation, the parties shall submit the dispute to the American Arbitration Association ("AAA") for arbitration conducted in accordance with the AAA rules.

3.6.5 A CSP may continue to operate at LAX during any negotiation, mediation, or arbitration relating to a Labor Peace Agreement conducted pursuant to Section 3.6.

3.6.6 In the event LAWA determines it necessary for public safety or the efficient operation of LAX to post police details or take other actions resulting from a CSP's violation of Section 3.6 or 3.10, LAWA shall have the authority to require CSP to reimburse LAWA for all reasonable costs incurred.

3.6.7 Nothing in Section 3.6 shall be construed as requiring a CSP, through arbitration or otherwise, to change terms and conditions of employment for its employees, recognize a Labor Organization as the bargaining representative for its employees, adopt any particular recognition process, or enter into a collective bargaining agreement with a Labor Organization.

3.7. Contractor Responsibility Program

Pursuant to Resolution No. 21601 adopted by the Board of Airport Commissioners, effective May 20, 2002, and amended by the Executive Director on August 6, 2012, the Contractor Responsibility Program (CRP) is the policy of LAWA to ensure that all LAWA contractors have the necessary quality, fitness and capacity to perform the work set forth in the license agreement. LAWA shall issue CSPLAs only to service providers it has determined to be Responsible Contractors.

Service providers applying to CSPP are required to complete and submit the "CRP Questionnaire" that provides information LAWA needs in order to determine if the service provider is responsible and has the capability to perform the contract. The information contained in the CRP Questionnaire is subject to public review for a period of not less than 14 days. Service providers applying to CSPP must complete, sign and submit the "CRP Pledge of Compliance." Service providers applying to CSPP must respond within the specified time to LAWA's request for information and documentation needed to support a Contractor Responsibility determination.

3.8 Worker Retention Ordinance

CSPs are subject to the City of Los Angeles Worker Retention Ordinance (WRO), which requires the retention of the successor contractor's employees for a ninety-day (90-day) transition period, who have been employed for the preceding twelve (12) months or more by the terminated contractor or

subcontractor (if any), as provided for in the WRO. City has the authority to terminate the service provider's CSPLA for violating provisions of the WRO.

3.9 Property and Facilities at LAX (if applicable)

CSPs must secure space, as necessary, for their staff (e.g., operational office space, employee locker and break areas); equipment (e.g., staging areas, equipment storage, equipment maintenance facilities) and, if necessary, motor vehicles parking on airport property.

CSPs may lease space directly from LAWA or sublease space from an airline/CSP client, subject to any required approvals. Contact the Commercial Development Group, Terminal Business Management Section at (424) 646-7200 for terminal space availability or the Leasing and Development Section at (424) 646-7200 for airfield space availability.

3.10 Labor Compliance

CSPs will abide by the requirements of all applicable labor laws and regulations, including the City of Los Angeles' Living Wage Ordinance, Worker Retention Ordinance, and Contractor Responsibility Program. A finding of non-compliance with any applicable labor laws and regulations, including the aforementioned ordinances and programs, for any CSP by any agency of jurisdiction may result in progressive penalties leading up to decertification, as described in Section 5.

3.11 Whistleblower Protection

3.11.1 CSPs shall not take an adverse employment action against any employee for making a complaint, cooperating with an audit or investigation, or participating in any administrative or judicial proceedings relating to a CSP's compliance or lack thereof with the CSPP or any City policy. A finding of whistleblower retaliation by a CSP by any agency or court of jurisdiction may result in progressive penalties leading up to decertification, as described in Section 5.

3.11.2 CSPs must fully cooperate with any investigation or audit of their operations and facilities, including, but not limited to, by providing access to any relevant records or facilities, by LAWA, or any other local, state, or federal agency of jurisdiction.

3.12 Wheelchair Services

In addition to the minimum program requirements above, Consolidated Core Service – Passenger Services providers are required to meet minimum standards in the following areas:

CSPs providing wheelchair services are responsible for understanding and satisfying all requirements for applicable laws and regulations covered under the following city, state, and federal statutes:

- Air Carrier Access Act (ACAA) (14 cfr, part 382),
- Americans with Disabilities Act (ADA) Title II (28 CFR Part 35),
- Americans with Disabilities Act (ADA) Title iii (28 CFR Part 36),

- Federal Aviation Administration (FAA),
- Transportation Security Administration (TSA),
- Department of Transportation (DOT),
- Section 504, Rehabilitation Act of 1973, as amended,
- California Civil Code sections 51 through 52 (Unruh Civil Rights Act), and
- LAWA Specific Policies as Outlined in the LAWA Rules and Regulations.

Each CSP:

3.12.1. Shall fulfill the requirements affecting the provision of air travel to guests with disabilities (includes boarding, deplaning, assistance and transfer to ground transportation).

3.12.2. Shall ensure all accessibility equipment are maintained in safe, good working condition. All equipment is subject to inspection by LAWA and other regulatory agencies. Broken or damaged equipment must be immediately removed from service to CSP leased or subleased space and out of public view.

3.12.3. Shall ensure all accessibility equipment are fully refurbished as required by manufacturer specifications, or as needed, and certified for use. All maintenance of equipment performed on airport property shall be performed inside CSP leasehold, or in locations approved by LAWA.

3.12.4. Shall ensure all accessibility equipment display a company name or logo and CSPP decal and stored in locations approved by LAWA. Equipment found to be prohibiting free access to emergency exits and/or found in unauthorized locations is subject to confiscation.

3.12.5. Shall not use another company's equipment without consent. A Company Authorization Letter must be on file with LAX Airfield Permits Unit for long term use of another company's equipment.

3.12.6. Shall have personnel and equipment capable of pushing a passenger weighing up to 250 lbs. up and down a 1:6 slope and have the ability to handle a passenger weighing up to 200 lbs. to or from an aircraft seat and an aisle chair. A CSP may use additional staff members and/or appropriate equipment necessary to meet this requirement.

3.12.7. Shall provide communication devices and adequate training for their personnel to ensure prompt and appropriate responses to service requests. Wheelchair attendants shall communicate any special need requirements to a designated Air Carrier representative, as necessary.

3.12.8. Shall provide trained personnel to accompany/assist passengers wheelchair bound or use other mobility assistance devices for passengers not independently mobile.

3.12.9. Shall ensure personnel wait with their ADA passenger for the ADA van/shuttle service to arrive at the designated shuttle stops in the Central Terminal Area (CTA) Departure's level (upper level). The ADA shuttle driver must take possession of the ADA passenger before the service company personnel departs.

3.12.10. Shall ensure passengers with disabilities making a transfer to a different airlines and/or wheelchair service provider are accepted/greeted by the receiving airline service provider. Transfer must occur at the ADA designated shuttle stop for that respective terminal and the receiving airlines/service provider personal must be available to take possession of the passenger with disabilities. Transfer shall be made within 15 minutes of arrival. If the receiving service provider is unavailable at the CTA curb/designated shuttle stop, then the passenger with disabilities will be returned to the initial requesting service provider to transfer the ADA passenger.

3.12.11. Shall have designated staff to coordinate with airline representative(s) to ensure sufficient service levels are met per the number of Special Service Requests (SSRs) received in advance, including SSRs received the same day for wheelchair services.

3.12.12. Service Providers shall furnish to LAWA and / or designated Air Carrier representatives any training or other records pertinent to any disability-related complaints upon request. Three or more validated complaints received by the ADA Office within a 6 month rolling period may result in a mandatory ADA Compliance Meeting with LAWA.

3.12.13. Shall submit a Monthly Wheelchair Usage Report on the number of wheelchair passengers enplaned and deplaned. The report must include statistics on complaints received and corrective actions taken, if any, during a month. The reports are due to the LAWA Coordinator and CSPP Manager by the 15th day of the following month.

3.12.14. Shall attend all ADA trainings, meetings, respond to inquiries and submit timely statistics/reports as requested by LAWA.

SECTION 4. ADMINISTRATIVE REQUIREMENTS

CSPs must keep in effect, for the term of their CSPLA, all administrative requirements and provisions within their CSPLA. If a CSP violates any of the provisions of the Program or fails to comply with any of the terms of their CSPLA, LAWA may require corrective actions and impose penalties up to and including termination of a company's CSPLA.

4.1. Application Process

A service provider may submit a Certified Service Provider License Agreement (CSPLA) pdf-fillable application form. Additional documents include a Letter of Intent from the service provider and a Letter of Verification from the airline/CSP

client. Templates for the letters can be found on the CSPP website at: www.lawa.org/cspp

4.1.1 Obtaining an application

To obtain the online application, visit the CSPP website and click the “PDF-Fillable Application” link. To obtain an application packet by mail, contact the Airfield Permits Office by phone at (424) 646-5880, or in writing to 7301 World Way West, Room 100, Los Angeles, CA 90045.

4.1.2 Submitting the application

Complete CSPLA application packets should include the following, if applicable:

- Application Checklist
- Application Form with business, contact and billing information
- Services and Locations for each airline/CSP client contract
- Estimated Annual Gross Revenue for contract(s) at LAX
- Work Experience
- Equipment Inventory List
- Vehicle Inventory List
- Facilities and Space Information showing adequate space to accommodate personnel, equipment and vehicles
- Letter of Intent from the service provider identifying the types and location of services, hiring airline/CSP client term of contract and approximate number of employees who will need LAX ID badges
- Letter of Verification from the hiring airline/CSP client with the name of the service provider, term of the contract, specific CSPP classification and types of services in the contract, confirmation of the service provider’s capacity, and if applicable, information about subleases and permitted property use
- Contractor Responsibility Program Questionnaire and Pledge of Compliance
- Outside Agency (Non-LAWA) Violations committed at LAX during the past 12 months
- Approved lease/sublease, Tariff Letter, Use Terms and Conditions (UTC) Agreement with LAWA or Space Authorization Agreement (SAA) from an airline/CSP client confirming adequate space and authorization for CSP to utilize their leasehold for LAX operations.
- Emergency Response Training Program for LAX employees.

4.2. Eligibility Criteria

LAWA will notify the service provider when their application packet is complete. Applicants should plan accordingly as the review and approval process of a

completed application may take up to 60 days. In order to execute the license agreement, the service provider must submit:

- Confirmation of an executed contract with the airline/CSP client (if not previously provided)
- A lease number or copy of a LAWA-approved lease/sub-lease, Tariff Letter, UTC or SAA
- Insurance approved by Risk Management
- Faithful Performance Guarantee
- Application fee

Once a CSPLA has been executed, the CM will notify the LAX Security Badge Office, if applicable. The term of a CSPLA will be consistent with the agreement(s) a service provider has with an airline/CSP client, up to June 30, 2021.

LAWA may deny CSPLA application approval if it finds any one or more of the following:

- The CSP applicant does not meet qualifications, application requirements and/or minimum standards.
- The CSP applicant has supplied LAWA with false or misleading information or has failed to make full disclosure in their application or in the supporting documents.
- The CSP applicant does not currently have nor is in the process of securing lease/sublease space at LAX through a LAWA-approved a lease/sublease, Tariff Letter, UTC or SAA to provide a CSPP-regulated service(s) at the time of application.
- The CSP applicant has defaulted in the performance of any lease or other agreement with LAWA.
- The CSP applicant is found by LAWA to not meet the applicable requirements of the Contractor Responsibility Program.

4.3. Permits and Licenses

CSPs, their employees and agents must possess and maintain throughout the term of their CSPLA all licenses and permits required to conduct business at LAX.

4.4. Fees

As part of the application process, service providers are required to submit a non-refundable application fee. CSPs are required to pay a monthly gross revenue fee, in addition to any other applicable fees.

4.4.1 CSPLA Application Fee

A service provider is required to submit a non-refundable CSPLA Application fee at the rate established by the Board of Airport Commissioners. The current

Application Fee is \$1,000. Payment must be made in the form of company check, cashier's check or money order.

4.4.2. Monthly Gross Revenue Fee Schedule

CSPs are required to pay a monthly gross revenue fee based on the estimated annual gross revenue for services invoiced at LAX. Monthly Activity Reports and lists of airline/CSP client contracts will be reviewed annually to verify the gross revenue fee information. Below is the Monthly Gross Revenue Fee Schedule:

Gross Revenue Band	Annual Gross Revenue	Monthly Fee due to LAWA	
		Effective July 1, 2019	Effective July 1, 2020
A	\$0 - \$249,999	\$145	\$150
B	\$250,000 - \$999,999	\$610	\$630
C	\$1,000,000 - \$1,999,999	\$1,450	\$1,500
D	\$2,000,000 - \$3,999,999	\$2,900	\$3,000
E	\$4,000,000 - \$5,999,999	\$4,840	\$5,000
F	\$6,000,000 - \$7,999,999	\$6,960	\$7,200
G	\$8,000,000+	\$7,830	\$8,100

4.4.3. Faithful Performance Guarantee (FPG)

CSPs are required to maintain a Faithful Performance Guarantee (FPG) equal to three (3) times the monthly fee paid to LAWA. An annual review of the CSP's Gross Revenue will be conducted to verify the FPG amount. The FPG amount must be submitted in the form of a) an irrevocable Letter of Credit if the FPG amount is \$10,000 or greater, or b) a cashier's check, company check or money order, if the FPG amount is less than \$10,000. The FPG is due prior to the execution of a CSPLA by LAWA. Failure to provide and/or maintain a proper FPG may result in corrective action.

4.4.4. Security Credential Fees

CSPs are required to pay any BOAC-approved and established fees for new, renewed, and lost security credentials (badges), as well as any fines.

4.4.5. Ramp and Apron Permit Fees

CSPs are required to pay any BOAC-approved and established fees for vehicle and equipment inventory permits.

4.4.6. Employee Parking

CSPs or their employees are required to pay for employee parking privileges if their employees opt to park in LAWA parking lots. CSPs will notify their employees that LAWA requires parking in appropriate designated spaces and not in residential or unapproved parking areas.

4.4.7. Into-Plane Fueling Fees

CSPs providing Into-Plane Fueling Services are required to collect any BOAC-approved and established fuel flow or fuel system/storage connection fees from aircraft operators or their agents.

4.4.8. Equipment Violation Fees

CSPs are required to pay any BOAC-approved monetary penalty for operating defective equipment on airport property.

4.5. Certification Compliance Officer (CCO)

CSPs must designate an employee as the primary point of contact for the administration of the program, to maintain records of the CSP, and to ensure compliance with the Program requirements.

The CCO is responsible for:

- 4.4.1 Maintaining current 24/7 contact information with LAWA.
- 4.4.2 Notifying LAWA's CSPP Manager within 30 days of a change in contract status, of:
 - 4.4.2.1 Any new contracts with an airline/CSP client, or
 - 4.4.2.2 Termination of contracts with airline/CSP client
- 4.4.3 Updating equipment/vehicle inventory data within 30 days of a change
- 4.4.4 Ensuring compliance with CSPP standards
- 4.4.5 Attending mandatory annual meetings with CSPP staff.

4.6. Monthly Gross Revenue Reporting Requirement

All CSPs are required to submit a Monthly Accounting Report verifying their Gross Revenue and services provided at LAX. LAWA reserves the right to audit the reported Gross Revenue to verify the monthly fee amount and adjust the fee as needed. Gross revenue calculations do not include the value of goods delivered or the value of fuel. The Monthly Accounting Report forms can be found at: www.lawa.org/cspp.

4.6. International Air Transport Association (IATA) Certification

All CSP ground handlers are required to obtain the IATA Certification for LAX by July 1, 2021. CSP ground handlers must maintain the certification and will be subject to the ISAGO audit on an annual basis and/or as requested by LAWA, as a condition of their CSPLA.

SECTION 5. COMPLIANCE ENFORCEMENT AND PENALTIES

5.1 CSPP Compliance

CSPs are responsible for complying with a set of common airport standards throughout the term of their CSPLA. CSPs are subject to all laws, statutes,

codes, acts, ordinances, charters, orders, judgments, decrees, injunctions, rules, regulations, permits, licenses, authorizations, directions and requirements of all governments, departments, commissions, boards, courts, authorities, agencies, officials and officers, including, but not limited to, LAWA, the City of Los Angeles, the State of California, and the Federal government.

5.2 Violations

To establish CSP accountability and to hold CSPs responsible for the actions of their employees while on duty, the CSPP enforcement program will combine (1) each CSP's violations and (2) the aggregate of each CSP's employee violations by tracking accumulated CSP penalty points. Penalty points will be assessed based on the number of violations issued by LAWA staff related to non-compliance of LAX Rules and Regulations and CSPP Requirements, including Major Violations. LAWA's SAFE Program for employee violators will continue in parallel to the CSPP enforcement program.

At the commencement of the CSPLA, LAWA will monitor the CSPP penalty point threshold process for violations based on the reported badged employee count of a CSP. The CSPP penalty-point thresholds are shown in the following table:

Threshold Points for Violations Accumulated in Any Continuous 12 Month Period		
Warning Notice	Notice of Non-Compliance	Notice of Investigation
2% of each CSP's badged employee count	5% of each CSP's badged employee count	10% of each CSP's badged employee count

Major Violations

In addition, to tracking violations, as outlined above, LAWA will also monitor and track each CSP's Major Violations. Below are the thresholds for Warning, Non-Compliance, and Notices of Investigation for Major Violations:

Major Violation Offenses Accumulated in Any Continuous 12 Month Period			
	Warning Notice	Notice of Non-Compliance	Notice of Investigation
Number of Offenses	1	5	7

A list of **Major Violations** which have serious consequences on safety and security at LAX are contained in the following table:

Safety	Driving	Security
<ul style="list-style-type: none"> Runway incursion Walking/driving on active Taxiway or Runway 	<ul style="list-style-type: none"> Impeding path of taxiing aircraft (cut-off) 	<ul style="list-style-type: none"> Arrest and/or conviction of any crime on LAX airport property, regardless of classification

<ul style="list-style-type: none"> Failing to yield to aircraft and emergency motor vehicles displaying flashing red lights 	<ul style="list-style-type: none"> Reckless driving resulting in personal injury or damage to airport or tenant property 	<ul style="list-style-type: none"> Using Airport-issued security credential for unauthorized or than approved and intended purpose
<ul style="list-style-type: none"> Unsafe use of equipment or vehicles resulting in personal injury or damage to airport or tenant property 	<ul style="list-style-type: none"> Texting or talking on cell phone while driving and causing a traffic accident or personal injury 	<ul style="list-style-type: none"> Defacing or vandalizing airport property, security systems, devices or Airport-issued security credentials
<ul style="list-style-type: none"> Failing to properly secure/store equipment/vehicles resulting in personal injury or damage to airport/tenant property 	<ul style="list-style-type: none"> Driving without a Restricted Area Driver Icon 	<ul style="list-style-type: none"> Gaining unauthorized entry to the AOA through an access door/gate by piggy-backing or tail-gaiting
<ul style="list-style-type: none"> Failing to comply with lawful orders given by Airport Ops and/or Airport Police 	<ul style="list-style-type: none"> Driving without a valid driver license 	<ul style="list-style-type: none"> Interfering with security screening, security procedures and/or personnel

The list of **ADA/CAA Violations** include but are not limited to the following:

ADA/CAA Violations
<ul style="list-style-type: none"> Client/passenger left unattended for more than 30 minutes, per regulations (unless dismissed by passenger)
<ul style="list-style-type: none"> Insufficient service levels (lack of pushers) for number of customers waiting resulting in shut down of airport operations.
<ul style="list-style-type: none"> Incomplete transfer to connecting flight and/or not meeting ADA van/shuttle within 15 minutes of arrival.
<ul style="list-style-type: none"> Improper transfer of disabled passenger to a different airline and/or wheelchair service provider.
<ul style="list-style-type: none"> Request or inference that a tip is being requested or required (includes instances where pushers infer a tip is necessary to carry luggage).
<ul style="list-style-type: none"> Equipment prohibiting free access to emergency exits, staged/abandoned in unauthorized locations, and/or unsafe to transport disabled passenger.
<ul style="list-style-type: none"> Placing unsafe amount of luggage and/or carry-ons on the customer/client.
Major Violations
<ul style="list-style-type: none"> One agent pushing more than one wheelchair/client.
<ul style="list-style-type: none"> Failing to provide personnel to accompany/assist passengers wheelchair bound or use other mobility assistance devices, in which passenger is not independently mobile, per regulations.

CSPs must submit a formal written request for an Administrative Hearing with the LAWA ADA Office to contest any citation(s) issued for ADA violations, within ten (10) calendar days of receiving the citation.

LAWA may amend the list of airport violations and/or associated thresholds at any time through a notice issued by the Chief Executive Officer.

5.3. Non-Compliance Tracking and Enforcement Actions

Each violation by a CSP will result in penalty points assigned to the CSP. In addition, for each citation issued to a CSP's employee by Airport Police or Airport Operations personnel, one penalty point will be assigned to the CSP employer. LAWA staff will review these records to determine if a pattern of inappropriate behavior, failure to meet minimum standards of performance, or equipment failing inspection is evident in the number, frequency, and severity of the violations.

If a CSP reaches or surpasses one of the penalty point accumulation and/or Major Violation thresholds within a continuous twelve month period as indicated in the tables above, LAWA will issue a Notice of Warning, Non-Compliance, or Investigation and may require a CSP's attendance at a Non-Compliance meeting. If a CSP does not take appropriate corrective action LAWA staff will conduct an investigation which may lead to the suspension of a CSP's operations including the deactivation of their LAWA-issued security credentials, or the termination of their CSPLA. A list of possible corrective actions for non-compliance is contained in the following table:

	Warning Notice	Notice of Non Compliance	Notice of Investigation
Possible Action	Advises CSP that a point accumulation has been reached and may require a corrective action.	Advises CSP that corrective action plan must be provided to LAWA.	Conduct mandatory meeting with CSP to review violations, training plan, provide recommendations for corrective action. Staff may audit CSP records.
Possible Result	Resolution or Notice of Non Compliance	Resolution or Notice of Investigation	Resolution, Suspension or Termination of the CSPLA and ID Badges

5.3.1 Notice of Investigation Meetings

CSPs that exceed the 10% penalty point threshold the first time are required to attend a Notice of Investigation (NOI) Level One meeting, in which LAWA resets their penalty points to zero (0). If CSP exceeds the 10% penalty point threshold a second time, a NOI Level Two meeting is conducted with LAWA senior management and the CSP is placed on probation. If CSP's performance does not improve, then a NOI Level Three meeting is conducted with LAWA Executive Management to determine if the CSP will continue operating at LAX. CSPs reaching the level of NOI must submit a Quarterly Training Status Report to LAWA due on the 10th day of the following quarter.

LAWA will notify a CSP's airline/CSP client if they are required to attend a Notice of Investigation Meeting with LAWA. LAWA's Chief Executive Officer may determine if the severity of a violation warrants a more serious action by LAWA.

5.3.2 Audits

To ensure that each CSP remains in compliance with the terms and conditions of their CSPLA, LAWA will conduct random compliance reviews, property, and equipment and vehicle inspections as deemed necessary. CSPs must retain all records and information related to their CSPLA during the term of their agreement and for a minimum of one (1) year after the expiration or termination of their CSPLA.

5.4. Cost Recovery

If there is damage to property resulting directly or indirectly from the actions of a CSP or their employees, LAWA reserves the right to recover costs to repair or replace the damaged property from the CSP.

SECTION 6. RECERTIFICATION PROCEDURE

LAWA will review a CSP's compliance with the CSPLA. CSPs are required to submit a letter to LAWA if changes occur in the status of a CSP's contract, lease, equipment, etc. within 15 days of the change. Additionally, on an annual basis and no more than 30 days after the fiscal year date of the Service Provider's CSPLA, the CCO is required to submit the following information:

- Statement certifying the CSP is in full compliance with the Program
- Updated list of contracts with any airline/CSP client
- Updated CSP contact information
- Updated vehicle and equipment inventory lists
- Employee Training Program
- Status of 16-Hour Annual Emergency Response Training
- IATA Certification*
- Updated Letter of Intent to confirm airline/CSP client contracts*
- Updated Letter(s) of Verification to verify airline/CSP client contracts*
- Corrective Action Plan*
- Updated FPG Letter of Credit*

**If necessary.*

In addition, CSPs must be in compliance with all CSPP requirements, which include attendance to mandatory meetings with LAWA staff that are designed to encourage communication, improve performance, provide program updates and collect feedback.

APPENDIX – DEFINITIONS

Air Operating Area (AOA) – A portion of an airport including aircraft movement areas, aircraft parking areas, loading ramps, and safety areas, for use by aircraft regulated under 49 CFR part 1544 or 1546, and any adjacent areas (such as general aviation areas) that are not separated by required security systems, measures, or procedures.

Airline/CSP Client – Term used in these standards to refer to an airline, airline consortium or tenant/occupant with a lease, sublease, tariff, UTC, operating permit or other LAWA approved instrument.

Air Carrier Access Act (ACAA) – Federal law which provides that no air carrier may discriminate against any otherwise qualified individual with a disability, by reason of such disability, in the provision of air transportation.

Americans with Disabilities Act (ADA) – Federal law that prohibits discrimination and ensures equal opportunity for persons with disabilities in employment, State and local government services, public accommodations, commercial facilities, and transportation. LAWA's ADA Coordinator can be contacted at (424) 646-5005.

Application Fee – Fee paid by successful service providers applying for a CSPLA.

Board of Airport Commissioners (BOAC) – The seven member commission that, pursuant to Los Angeles City Charter, governs LAWA, controls the airport assets, and is responsible for formulating airport policies and establishing rates and charges.

Certified Compliance Officer (CCO) – A CSP's primary point of contact for matters related to the CSPP, who will audit the activities and records of the CSP, and will attest that the standards are being met.

Certified Service Provider (CSP) - A service provider that has been selected by an LAX airline/CSP client to provide services in the Core Service and/or Limited Services classifications regulated by CSPP and has received that designation from LAWA following an application and evaluation process.

Certified Service Provider License Agreement (CSPLA) – A non-exclusive license agreement issued to a Certified Service Provider that desires to provide any of the Core Services and/or Limited Services regulated by the CSPP and has successfully completed the CSPP application process. The CSPLA authorizes a CSP and their employees to have access to LAX.

Chief Executive Officer – The General Manager of Los Angeles World Airports.

City – The City of Los Angeles, a municipal corporation under the same name and possessed of all the property and interests it possesses and is regulated by City Charter, and Administrative and Municipal Codes.

Compliance Manager (CM) – LAWA's designated staff member who will monitor Certified Service Providers and their participation in the CSPP.

Core Services Classification – Classification which includes five service categories: Passenger, Ramp, Interior Aircraft Cleaning, Security, and Into-Plane Fueling services.

Days - Unless otherwise specified, “days” shall mean calendar days.

Equipment - Any apparatus, cart, rolling stock or other tool used to transport, operate, service or maintain business activities at LAX.

Faithful Performance Guarantee (FPG) – Guarantee posted with LAWA to secure the faithful performance by a CSP of all the terms, provisions, and covenants contained within their CSPLA. This includes, but is not limited to, the payment of fees and any other specified compensation. The FPG will be separate from other Guarantee(s) required by LAWA.

Ground Service Equipment (GSE) - Support equipment, powered or non-powered, found at an airport, usually on the ramp, and used to service aircraft. The functions of this equipment generally involve ground power operations, aircraft mobility, baggage/cargo movement, food and lavatory, and loading operations (for both cargo and passenger aircraft).

Gross Revenue - Money generated by all of a service provider's operations, before deductions for expenses. The value of goods and fuel delivered are excluded from this calculation.

Labor Compliance - CSPs will abide by the requirements of all applicable labor laws and regulations, including the City of Los Angeles' Living Wage Ordinance, Worker Retention Ordinance, and Contractor Responsibility Program.

Labor Harmony – CSPs covenant that their employees at LAX shall be able to work in labor harmony in order to protect LAWA's proprietary and economic interests.

LAWA Commercial Development Group (CDG) - LAWA division responsible for overseeing the agreements and use of all commercial land and buildings at LAX.

LAWA Consent to Sublease – Document provided to companies who sublease space from an airline and/or tenant to provide services at LAX.

LAX Rules & Regulations - Document that contains the rules, regulations, procedures, and general information governing operational activities at LAX. The objective of the manual is to promote the safe and efficient use of LAX facilities.

Letter of Intent – Letter submitted to LAWA by a service provider applying to CSPP indicating they have a contract or preliminary agreement with an airline/CSP client to provide Core and/or Limited Services and requesting a CSPLA to work at LAX.

Letter of Verification – Letter sent by an airline/CSP client to LAWA verifying that a service provider has a contract, verifies the service provider's capacity to accomplish the work and needs a CSPLA to work at LAX or has reached a conditional agreement to enter into a contract once an application has been approved.

Limited Services Classification – Classification which includes four service categories: Maintenance - Aeronautical, Cargo - Freight, Cargo - Passenger, and Terminal services.

Los Angeles World Airports (LAWA) – City of Los Angeles Department of Airports.

Motor Vehicle – Any automobile, automobile truck, tractor, loader, or any other self-propelled vehicle designed for driving on the airport.

Non-Compliance – The state of a CSP being out of conformity with the terms and conditions of their CSPLA.

Non-Exclusive License Agreement (NELA) – License issued to service providers who are not subject to CSPP.

Operations Base - Operations Base – a facility on LAX at which or in which passengers or cargo are processed or aircraft/equipment maintenance is performed and which houses equipment, personnel and/or supplies. Types of Operations Bases for an airline include, but not limited to, passenger terminals, cargo buildings, hangars, other maintenance buildings, offices and dispatch centers.

Recurrent Training – Training that takes place to refresh principles received from an initial training program.

Security Badges – Badges issued by LAWA Airport Police, Security Credential Section (LAWA Badge Office). The security badge grants individuals, escorted or unescorted access to sterile areas, secured areas, and Security Identification Display Areas (SIDA) at LAX.

LAX Space Authorization Agreement – Agreement signed by the CSP and an airline/tenant that confirms authorization for CSP to operate on airline/tenant's leasehold and/or sub-leasehold at LAX.

Tariff Letter – LAX Terminal Facilities Tariff Letter (Tariff) instrument. The Tariff was created to establish the terms and conditions applicable to occupants of terminal facilities at LAWA. The Tariff applies to occupants who do not have a current lease and to occupants whose lease has expired. Occupants do not have property rights.

UTC – LAX Non-Terminal Facilities Use Terms and Conditions (UTC) instrument. The UTC was created to establish the terms and conditions applicable to occupants of facilities (other than terminals) at LAWA. The UTC applies to occupants who do not have a current lease and to occupants whose lease has expired. Occupants do not have property rights.

Whistleblower Protection - CSPs shall not take an adverse employment action against any employee for making a complaint, cooperating with an audit or investigation, or participating in any administrative or judicial proceedings relating to a CSP's compliance or lack thereof with the CSPP or any City policy.