

EB-2 NIW Supporting Documentation
July 2022

EEC Maintenance LLC

Mr. Eduardo Emilio Codognotto
Director and Senior Aircraft Mechanic
(561)455-6003
eduardo.codognotto@gmail.com



Contents

1	Executive Summary	3
1.1	The Petitioner’s Expertise	3
1.2	The U.S. Company	5
1.3	Location.....	6
2	Industry and Market Analysis	7
2.1	Aircraft Maintenance, Repair, and Overhaul Industry in the U.S.	7
2.1.1	<i>Industry Barriers to Entry</i>	9
2.1.2	<i>Industry Major Markets</i>	9
2.1.3	<i>Industry Demand Determinants</i>	11
2.1.4	<i>Business Locations</i>	12
2.2	Company’s Targets.....	14
3	Services	15
3.1	Aircraft Maintenance	15
3.2	Aircraft Rental	15
4	EEC Maintenance LLC’s Strengths	15
4.1	Mr. Codognotto’s Professional Experience.....	15
4.2	Skilled Labor	16
4.3	Superior Customer Services	16
4.4	Rigorous Quality.....	17
5	Marketing and Competitive Features	17
5.1	Website and Digital Marketing	17
5.2	Social Media	18
5.3	Review Platforms	19
5.4	Word-of-mouth Marketing	19
5.5	Other Marketing Strategies	19
6	Key Management and Personnel	20
6.1	Director and Senior Aircraft Mechanic: Mr. Eduardo Emilio Codognotto	20
6.1.1	<i>Education</i>	20
6.1.2	<i>Courses</i>	20
6.1.3	<i>Professional Experience</i>	21
6.1.4	<i>Projects</i>	23
6.1.5	<i>Inspections</i>	24
6.1.6	<i>Reference Letters</i>	26
6.1.7	<i>Duties at the U.S. Company</i>	27
6.2	Aircraft Mechanics	27
6.3	Personnel Plan	28
6.4	Personnel Summary	28
6.5	The Company’s Internal Organizational Chart Year 5.....	29
7	Need for the Company’s Services	29
8	Mr. Codognotto’s National-level Impact	35
9	Financial Forecasts	39
9.1	Sales Forecast.....	39
9.2	Profit and Loss.....	39
9.3	Balance Sheet.....	39





1 Executive Summary

1.1 The Petitioner's Expertise

This document has been prepared to support Mr. Eduardo Emilio Codognotto's (hereafter also referred to as the Petitioner or Mr. Codognotto) business in the U.S. It will highlight the Petitioner's potential contribution to the Aviation Industry in the U.S. as an aircraft mechanic with relevant experience in aircraft maintenance. Mr. Codognotto directs and oversees the operations of EEC Maintenance LLC (hereafter also referred to as the Company), a Florida-based company that provides aircraft maintenance services to aircraft owners, aviation schools, and skydiving airlines. The Petitioner's endeavor is to continue performing aircraft maintenance services through EEC Maintenance LLC to ensure the safety and proper operations of aircraft in the U.S. Mr. Codognotto also wishes to share his experience with other aircraft mechanics in the U.S. to assist them in advancing their careers, and to help the U.S. alleviate the negative effects of the labor shortage in this field.

Since a young age, the Petitioner has specialized in the Aircraft Maintenance Industry. He graduated from high school in Belo Horizonte, Brazil, and went on to earn a professional qualification in aircraft maintenance, becoming an Aircraft Maintenance Technician. He also completed many courses in the field of aircraft maintenance. All of these courses provided Mr. Codognotto with a wealth of theoretical and practical aircraft maintenance knowledge as well as insights into how aircraft maintenance courses are conducted. This will allow him to become an instructor himself and better understand how he can best pass on his extensive knowledge and experience to U.S. aircraft mechanics looking to improve their aircraft maintenance skills.

The Petitioner has 31 years of professional experience as an aircraft mechanic and four years of experience as a quality inspector. He worked at multiple prominent Brazilian companies such as Chamone Indústria Aeronáutica, Total Linhas Aéreas S.A., Líder Táxi Aéreo, and Azul Linhas Aéreas/Trip Linhas Aéreas. He also worked for Tradewinds Aviation Associates at the Fort Lauderdale Executive Airport in the U.S. with an H-3 trainee visa and later with a work permit. During this time, Mr. Codognotto has gained vast knowledge in the powerplant area (the engine and every component that together compose enough traction to sustain flight), repairs in pressurized aircraft, compliance, and incorporation of SBs (Service Bulletins) and ADs





(Airworthiness Directives), and installation of aerodynamic kits. He also gained experience in the construction of airplane kits, handling various types of rivets, as well as reading and interpreting technical drawings and manual instructions.

During all these years in the aviation environment, Mr. Codognotto kept up with changes throughout the relevant systems and the improvements developed to make flying safer and more accessible. One of those changes was the introduction of the GPS system – a system now regarded as standard, but whose implementation completely changed aviation. Not only did the Petitioner install countless GPS systems, but he also took part in the installation of performance kits, which are additions to the systems or structures of an aircraft with the of increasing its overall performance. Aside from these services, the Petitioner also participated in various projects such as the complete construction of airplane kits, which are still flying in perfect condition in Brazil.

Mr. Codognotto has also gained other relevant business and organizational skills. He is capable of successfully working independently or as part of a multinational team, as well as managing various projects and responsibilities and delivering accurate and timely information. The Petitioner has strong leadership, analytical, and interpersonal skills. Mr. Codognotto is skilled in planning, organizing, and managing logistics while staying customer-focused and constantly improving processes.

With the increase in air traffic volumes, there is a rising need for aircraft maintenance and repair services. The Aircraft Maintenance, Repair, and Overhaul Industry are strongly tied to the Domestic Airlines Industry and factors that drive air travel, namely, per capita disposable income, and the world price of crude oil serve as base measures of both economic conditions and the price of air travel. A forecast continuation of favorable economic conditions, including climbing wages and declining unemployment, are projected to lead to increased air travel, increasing industry revenue at an annualized rate of 2.8% to \$19.1 billion over the five years to 2026.¹ This indicates that there will be a high need for aircraft maintenance services in the U.S. in the future.

As an expert Aircraft Maintenance Technician, Mr. Codognotto is well-positioned to advance his proposed endeavor in the U.S. In addition to the Petitioner's impressive maintenance, repair, and

¹ Source: IBISWorld, Aircraft Maintenance, Repair, and Overhaul Industry in the U.S., Industry Report, 2016





overhaul (MRO) experience, he is skilled in managing MRO-related operations, procedures, and supporting processes. Mr. Codognotto's proposed endeavor in the U.S. will benefit the overall U.S. economy. His impressive achievements, personal values, and goals strongly indicate that he will serve the U.S.' national interest in the future. The Petitioner's advanced qualifications and proposed endeavor, which carry substantial merit and national importance, make him eligible to apply for an EB-2 NIW visa. His presence in the U.S. will significantly contribute to filling the market gap in the future.

1.2 The U.S. Company

EEC Maintenance LLC was formed on March 10, 2016, in Florida, and Mr. Codognotto has already invested \$35,000 into EEC Maintenance LLC. The Petitioner has been offering his vast experience and specialized services to aviation schools, skydiving airlines, and aircraft owners. Mr. Codognotto currently owns 100% of the Company, but intends to add Mr. Pedro Emilio Correa Codognotto and Mr. Benjamin Rawert to the ownership in the future. The Petitioner would then own 50% of EEC Maintenance LLC, while Mr. Pedro Emilio Correa Codognotto and Mr. Benjamin Rawert would both own 25% of the Company's interests.

Mr. Codognotto is specialized in sheet metal work, which is a rare but extremely needed niche in aviation that is at risk of extinction worldwide. In the country with the biggest aircraft fleet in the world (approximately 204,980 aircraft are currently registered in the U.S.),² aircraft maintenance services that the Company offers are always in demand. Due to the scarcity of workers in the Petitioner's area of expertise (aircraft maintenance, crash recovery, sheet metal, and inspection), he started EEC Maintenance LLC with the intuition of tending to small business owners and private owners of executive aircraft. Mr. Codognotto also aspires to train the Company's employees and share his knowledge with them.

The Company currently operates from its warehouse, but will soon move to a hangar at an airport in Melbourne (Florida) and operate from there. EEC Maintenance will prospect customers through commercial visits and meetings and will get client lists through alliances with businessmen and aircraft owners. During Year 1,³ the Company will target Melbourne and the

² Source: www.statista.com/statistics/183513/number-of-aircraft-in-the-united-states-since-1990

³ Year 1 starts once the Petitioner's visa is approved.





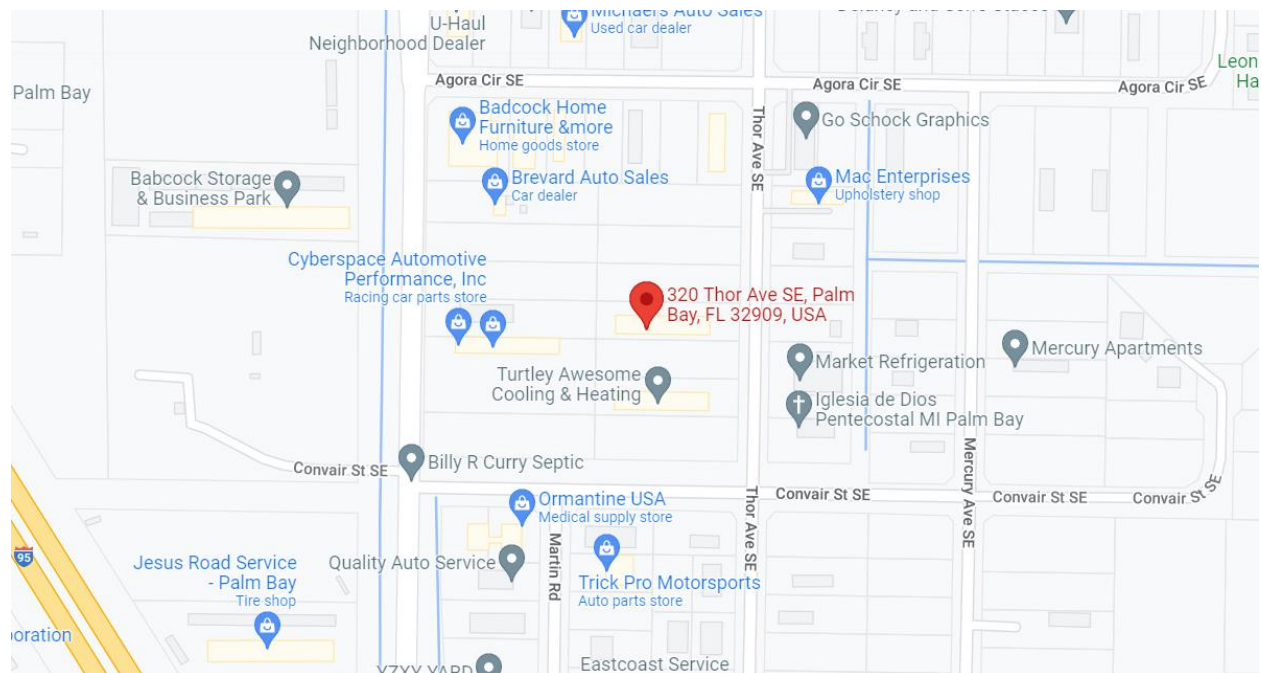
Orlando National Airport. In the following years, EEC Maintenance LLC will expand its targeted area to:

- Year 2 - Crystal River Captain Fields Airport
- Year 3 - Lake Wales Municipal Airport
- Year 4 - Winter Haven Regional Airport & FBO
- Year 5 - Fort Lauderdale Executive Airport

Mr. Codognotto's academic background and extensive experience in the field of aircraft maintenance will prove instrumental in leading EEC Maintenance LLC to the expansion of operations in the U.S. over the coming years, as well as contribute to the development of other industry professionals' skills and the overall quality of U.S. aircraft.

1.3 Location

EEC Maintenance LLC's warehouse is located at 320 Thor Ave SE, Palm Bay, FL 32909.



On November 17, 2020, the Company signed a lease agreement with Affordable Warehouse and Storage to rent the 1,200-square-foot Suite 7 at the above-mentioned address. The term of the lease commenced on December 1, 2020, and the rent is set at \$700 per month, along with a \$45.50 sales tax. On February 17, 2021, EEC Maintenance LLC signed another lease agreement with Affordable Warehouse and Storage to rent the 1,200-square-foot Suite 6 at the same





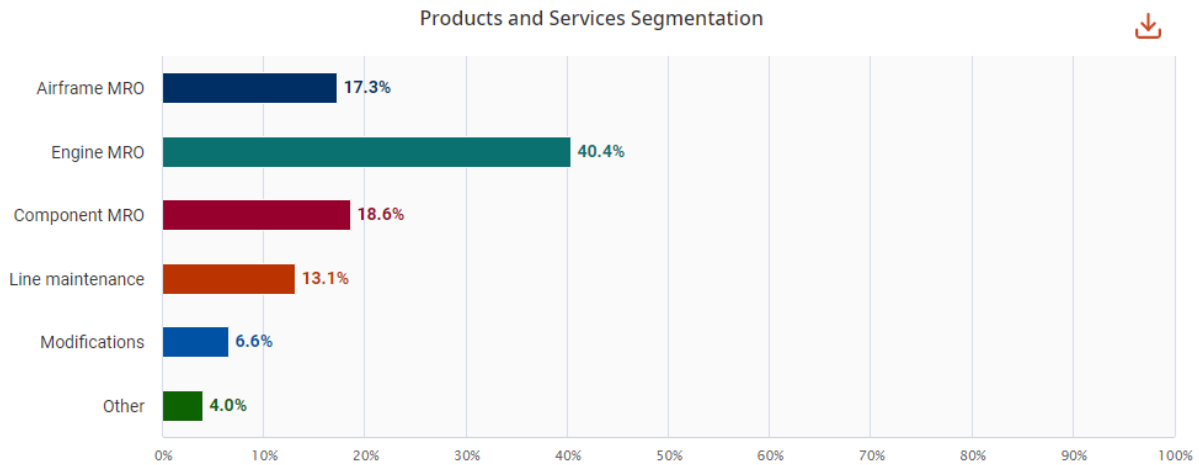
address. The term of the agreement commenced on February 23, 2021, while the rent is the same as for Suite 7.

The Company intends to rent a hangar at an airport in the future, allowing it to provide its services directly at the airport. EEC Maintenance LLC is currently on a waiting list for a hangar at a Melbourne (Florida) airport and plans to relocate from the warehouse as soon as possible.

2 Industry and Market Analysis

2.1 Aircraft Maintenance, Repair, and Overhaul Industry in the U.S.

According to IBISWorld,⁴ one of the world's leading publishers of business intelligence specializing in industry and procurement research, companies in this industry provide support services to air transportation operators, such as aircraft inspection and testing, ferrying aircraft between departure gates and taxiways, aircraft maintenance and repair, and aircraft and parts overhaul. The main industry services are commonly referred to as maintenance, repair, and overhaul (MRO).



2022 INDUSTRY REVENUE

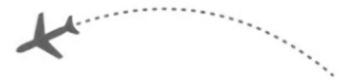
\$33.0bn

Aircraft Maintenance, Repair & Overhaul
Source: IBISWorld

The Aircraft Maintenance, Repair, and Overhaul Industry has been anticipated to exhibit positive revenue performance due to a sharp increase in consumer air travel towards the end of the period. Industry operators deliver support services to aircraft operators. Key services include

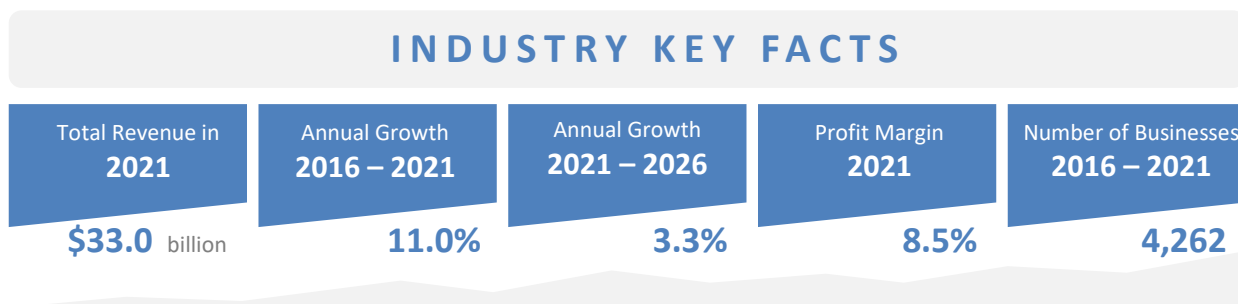
⁴ Source: IBISWorld, Aircraft Maintenance, Repair, and Overhaul Industry in the U.S., Industry Report 2022





aircraft inspection and testing; ferrying aircraft between departure gates and taxiways; aircraft maintenance and repair; and aircraft and parts overhaul. As a result, industry demand is directly linked to performance within the broader group of air traffic industries. Sharply reduced air travel due to negative effects of the COVID-19 (coronavirus) pandemic reduced revenue in 2020. However, improving economic conditions led to a pickup in air travel and, in turn, aircraft usage. As a result, industry revenue is expected to increase at an annualized rate of 11.0% over the five years to 2022 to \$33.0 billion. This includes an expected 21.3% gain in 2022 alone.

Domestic trips by U.S. residents have increased overall in the current period. As aircraft usage increases, demand for maintenance, repair, and overhaul (MRO) services rises as well. Furthermore, newer aircraft that require more advanced MRO, particularly in regard to onboard flight systems, have enabled industry operators to incorporate higher-margin technical services as part of their service offering. Still, domestic and international air traffic has experienced unprecedented disruption from the coronavirus pandemic, leading to similar declines in MRO revenue.



Industry demand will be characterized by broader recovery from the coronavirus pandemic moving forward. In the following years, industry revenue is forecast to increase at an annualized rate of 3.3% to reach an estimated \$38.7 billion in 2027. Rebounding economic growth is anticipated to lead to increased air travel and aircraft usage. As a result, demand for industry services will rise. Nonetheless, the degree of recovery in the current year is primarily dependent on the speed and efficacy of mass immunization efforts, leaving future growth prospects largely uncertain.





Year	Revenue (\$m)	IVA (\$m)	Establishments (Units)	Enterprises (Units)	Employment (Units)	Wages (\$m)	Domestic trips by US residents (Million people)
2022	32,988	12,954	5,276	4,262	131,662	9,517	794
2023	35,073	13,779	5,579	4,504	140,186	10,130	811
2024	36,100	14,250	5,841	4,720	146,173	10,536	826
2025	36,991	14,693	6,111	4,943	152,099	10,929	838
2026	37,850	15,160	6,408	5,191	158,284	11,336	850
2027	38,732	15,617	6,737	5,466	164,648	11,753	862
2028	39,699	16,130	7,094	5,764	171,774	12,219	868

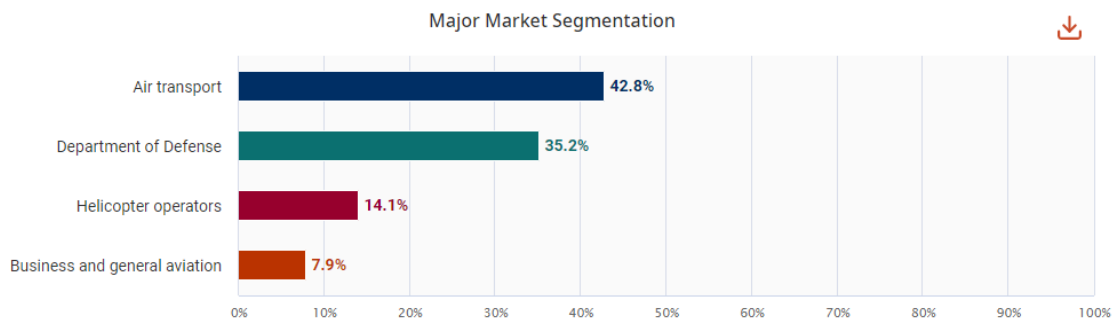
2.1.1 Industry Barriers to Entry

Barriers to entry in the Aircraft Maintenance, Repair, and Overhaul Industry are moderate because the entire air transportation sector is highly regulated, and licensing and reporting requirements are high.

Any company that wants to enter the industry needs to comply with the myriad regulations set out by the Federal Aviation Administration while securing equipment and labor at the same time. The cost of machinery and equipment depends on a company's size.

Over the five years to 2027, industry operators are expected to expand their operations in line with the overall Air Travel Industry cluster. Larger companies have the infrastructure and financial resources that are necessary to win new contracts by offering the lowest price and an established safety and performance record. Smaller contracts, especially for geographical areas that the major players do not consider significant growth areas, such as the recreational aircraft sector, will likely provide work for small-scale and new industry players. New players with limited experience are not as likely to enter the industry. Instead, acquisitions will likely increase in the future, as businesses from other sectors seek to join the industry and original equipment manufacturers increasingly engage customers with aftermarket maintenance services.

2.1.2 Industry Major Markets





Air transport

Commercial air transportation of both cargo and passengers represents the largest market segment for the Aircraft Maintenance, Repair, and Overhaul (MRO) Industry in 2022, accounting for an estimated 42.8% of revenue.

Commercial airlines often contract third-party MRO services to reduce capital and labor requirements for administering these services in-house. Furthermore, the large diversity in industry service offerings enables many small-scale operators to secure favorable contracts by specializing in a particular service group. Still, markets are highly concentrated toward domestic US airlines, since these companies account for the largest proportion of the domestic air fleet. For instance, Delta Air Lines Inc. accounted for more than two-thirds of the US commercial aircraft fleet and the majority of domestic air traffic in 2019 (latest data available). Consequently, domestic airlines are the industry's largest clients. The market size of mainline carriers is further boosted because they primarily fly large commercial aircraft, which require far more intensive maintenance, repair, and overhaul (MRO) than small aircraft.

This market segment has increased to represent the largest segment over the five years to 2022. This was driven by pent-up demand for travel after the peak of the COVID-19 (coronavirus) pandemic in 2020 as health and safety restrictions eased. Domestic trips by US residents increased 63.5% in 2021, while international trips by US residents rose 37.0% in the same year. As health and safety guidelines related to the pandemic situation continue to ease into the current year, it is projected that demand for this segment will increase. Still, this market segment is heavily dependent on the state of domestic and global health, experiencing volatility as coronavirus outbreaks continue to pose a threat.

Department of Defense

The US Department of Defense (DoD) is expected to account for 35.2% of industry revenue in 2022.

The DoD has more than 10,000 aircraft ranging from fighters to bombers, all of which require MRO work. Typically, the military directly takes care of more than 50.0% of MRO work to maintain the core capability in times of war, with the rest of the workload outsourced on a contract basis.





The DoD has sought to outsource more MRO work, increasing this segment's share of revenue during the period. Increases in commercial air traffic have decreased these segments' share of revenue in the current period. However, the Russian invasion of Ukraine is expected to increase federal funding for defense, which may present itself in five years to 2027.

Business and general aviation and helicopter operators

Business and general aviation markets, which include private aircraft owned and operated by individuals and corporations, are expected to account for an estimated 7.9% of industry revenue in 2022.

Despite there being nearly 220,000 general aviation aircraft, including single-engine personal aircraft, business jets, and helicopters, in the United States, their small size enables far lower flying hours than commercial-size aircraft, meaning that general aviation aircraft account for a smaller share of industry revenue. Thus, business and general aviation, as a share of revenue, has remained stable during the period. Additionally, helicopter operators account for 14.1% of revenue in 2022, also remaining a stable share of revenue over the past five years.

2.1.3 Industry Demand Determinants

Demand for services in the Aircraft Maintenance, Repair, and Overhaul Industry depends almost entirely on the level of activity in the air transportation sector. Airlines are the largest customers for industry operators, and changes in the aircraft fleets owned by air carriers generate demand for maintenance, repair, and overhaul (MRO) services. Fleet changes that affect the need for MRO include the average age of the aircraft, hours flown, the number of aircraft accidents, and the number of active aircraft.

When the average age of an aircraft fleet is on the rise, companies need to increase spending on MRO to maintain safety levels and meet compliance requirements. Similarly, the more hours that an aircraft spends in the air, the more they require the services provided by this industry. At the same time, when the number of active aircraft on a national level is up, the need for MRO services increases. The total national fleet includes both civil and military aircraft; military aircraft numbers and flying time generally grow when the United States is involved in armed conflict. Additionally, when aircraft accidents occur, the vehicles need to be repaired, which industry operators usually conduct. While the introduction of new aircraft can lead to a larger fleet and



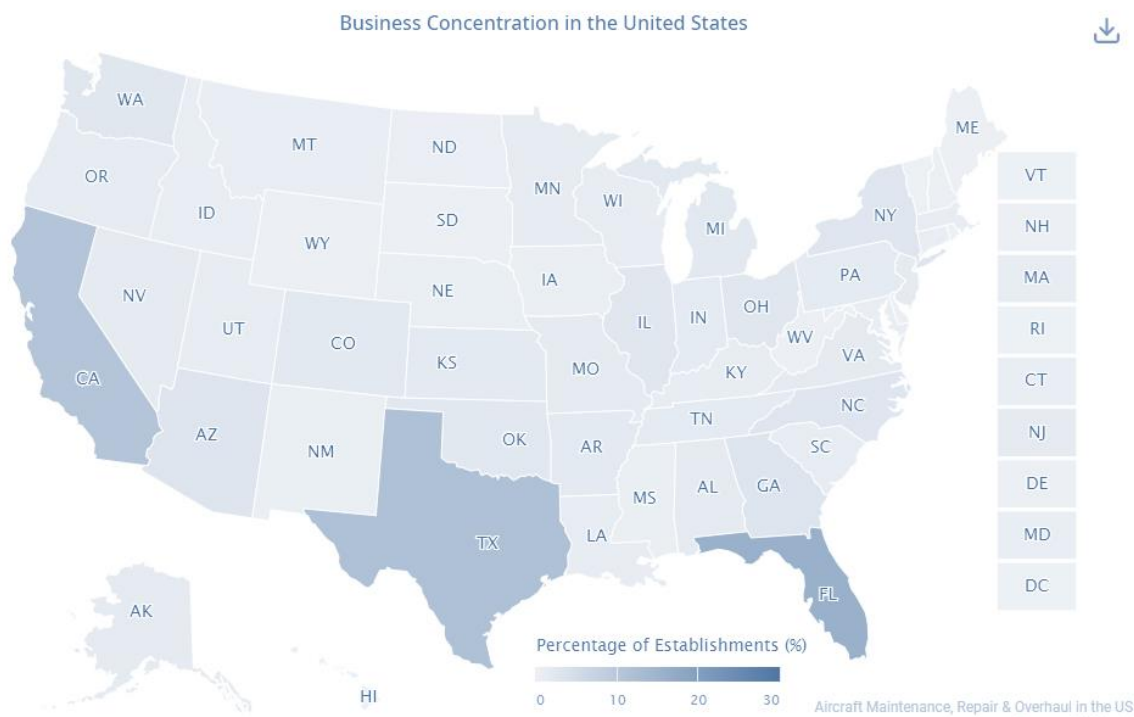


hence more demand for industry services, it can also reduce demand because newer planes require less MRO.

Other factors that generate demand for industry services include governmental safety regulation and the public's awareness of safety issues. The Federal Aviation Administration requires that all commercial aircraft in service undertake scheduled maintenance. The timing of scheduled maintenance for an aircraft is based on its number of flying hours. If regulation reduces the number of hours required for scheduled maintenance, this factor would increase the demand for MRO services. The government plays a significant role in ensuring that airlines provide the safest service possible, making regulation a significant factor in this industry. Regulation will likely change when safety concerns are raised, either by the public or by corporations.

Some airlines provide MRO services for their own fleets, while others outsource services provided by the industry. Over the past decade, airlines have sought to reduce staff and operational costs to protect profit. This trend has boosted demand for companies that provide support and ancillary services. Outsourcing is becoming widespread across many sectors, including air transport and related services. Many companies struggling to make ends meet are also outsourcing to countries with lower-cost labor.

2.1.4 Business Locations





The distribution of establishments in the Aircraft Maintenance, Repair, and Overhaul Industry is primarily focused in the Southeast, West, and Southwest regions of the United States. In 2022, the Southeast region, which comprises 25.9% of the US population, accounts for 32.3% of industry establishments. Following the Southeast, the West region is anticipated to account for 18.3% of establishments in 2022. Additionally, the Southwest region is estimated to comprise 17.5% of industry establishments in 2022. On a state-by-state basis, significant shares of industry establishments are located in Florida with 15.8%, Texas with 11.7%, and California with 11.0%.

Low population density explains why there are more industry establishments in these regions. Low population density increases the likelihood of flying between destinations, and therefore, the number of airports. Likewise, Alaska, Texas, California, Oklahoma, and Washington each have many airports. Many of these airports are also airline hubs with major facilities located in: Dallas; Fort Worth, TX; Los Angeles; Denver; Orlando, FL; Atlanta; and Seattle. Area-specific factors include the high proportion of mining companies in Texas that generally fly staff between work sites; additionally, Florida is the gateway to the Bahamas and Caribbean, which are popular holiday destinations for US residents.

Regions with disproportionately fewer establishments on a per capita basis include the Mid-Atlantic, with an estimated 7.1% of establishments in 2022; the Great Lakes, with 9.8% of establishments; the Rocky Mountains, with 5.1% of companies; and New England, with a 3.0% of establishments. The small number of industry establishments in these regions is primarily due to each region's high population density, which encourages ground transportation to link populations in closely located major cities. Moreover, high population concentration means that fewer airports can serve many people. Lastly, establishments that are in the Mid-Atlantic region are much larger than the national average, with a smaller number of more expansive locations meeting the region's demand.





2.2 Company's Targets

Aircraft Owners

According to Statista⁵, it is estimated that the general aviation fleet of the U.S. counts about 204,980 aircraft. Considering how each of those aircraft requires constant maintenance, it is to be concluded that there is a high demand for aircraft mechanics and specialized technicians. Boeing,⁶ an American multinational corporation that designs, manufactures, and sells airplanes, forecasts that the North American Aviation Industry, including airlines and repair stations, will need to hire 132,000 technicians between 2021 and 2040 to stay competitive. The high demand for technicians will force aircraft owners (who are often businessmen) to approach the Company, as EEC Maintenance LLC is capable of providing all the necessary services that aircraft owners might require. Through the Company's excellent reputation, word-of-mouth recommendations, and professional and thorough approach to the projects, EEC Maintenance LLC will exponentially increase its client base over time without any doubt.

Aviation Schools and Skydiving Airlines

According to IBISWorld⁷, there are 875 aviation school businesses currently active in the U.S., with expected annual growth of 5.2%. With each school owning several of its own training aircraft, it is to be considered that there are more than 3,000 training aircraft requiring specialized maintenance in the US. Considering how skydiving and aviation school companies have a lot of traffic daily with nonstop flights during busy days resulting in a constant need for maintenance, whether corrective or protective, EEC Maintenance LLC can provide necessary repairs without disrupting the fast workflow of the businesses. Even though skydiving and aviation companies usually have their own maintenance staff, it has been proven repeatedly that there is a significant shortage of specialist technicians that are able to provide adequate service and maintenance to the used aircraft. The Company, on the other hand, will have experienced and specialized staff capable of any kind of repairs and maintenance, including specialized work with sheet metal and structure, gaining an immense upper hand over the nearby competition.

⁵ Source: www.statista.com/statistics/183513/number-of-aircraft-in-the-united-states-since-1990/

⁶Source: www.travelweekly.com/Travel-News/Airline-News/Aircraft-mechanic-shortage-could-hamper-operations

⁷ Source: IBISWorld, Flying Schools Industry in the U.S., Industry Report 2021





3 Services

3.1 Aircraft Maintenance

EEC Maintenance LLC provides both corrective and preventive aircraft maintenance services. Preventive maintenance refers to the protocols that every aircraft has and must be followed. Corrective maintenance is performed when, for some reason, an aircraft has suffered an accident, either due to human error or natural phenomena. Since Mr. Codognotto is a specialized sheet metal worker and a mechanic, the Company performs structural repair work, disassembles the aircraft wherever it is and moves it to its warehouse, or performs the rebuilding work at the airport if the transport is not possible. This work necessitates the use of aviation-specific tools and materials, and recovery is also carried out in accordance with each aircraft's manuals and rules, which are inspected by the FAA (Federal Aviation Administration). When the plane is fully recovered, EEC Maintenance LLC takes it to an airport and assembles it. This assembly refers to the installation of wings, elevators, landing gear, engine, and other things related to completion. The Company also makes adaptations to panels for the installation of navigation equipment and installation of kits to improve the performance of an aircraft.

3.2 Aircraft Rental

Mr. Codognotto bought a CESSNA-172 aircraft for \$18,490 at an auction. The Company intends to do the necessary repairs on this aircraft, after which its price will jump to approximately \$215,000, and lease it to an aviation school. The rent for the use of this aircraft will be \$5,000 per month.

4 EEC Maintenance LLC's Strengths

4.1 Mr. Codognotto's Professional Experience

Mr. Codognotto is an aircraft maintenance technician, builder, mechanic, safety inspector, and recovery expert. He has an encyclopedic knowledge of high-end aircraft and has 31 years of experience, of which 27 are in executive aviation and four as a commercial aviation inspector. The Petitioner is skilled in kit installation, handling several types of rivets, using tools specifically in the field of aircraft structure, and understanding technical drawings and manuals. He has experience in recovering damaged or dented structures, building experimental aircraft,





recovering crashed aircraft, disassembling and assembling aircraft parts, and performing technical transportations of dismantled small aircraft. Mr. Codognotto's business acumen and relationships with various aircraft owners will benefit EEC Maintenance LLC's future development and allow for the Company's expansion in the future.

4.2 Skilled Labor

The Company will be committed to hiring highly competent employees who have ample knowledge regarding aircraft maintenance and repair. This will enable EEC Maintenance LLC to provide fast and reliable service. The Company's Aircraft Mechanics will have wide technical expertise in aircraft power generation and extensive knowledge of aircraft accessories that will enable them to deliver timely MRO and ancillary services. EEC Maintenance will conduct a thorough background check of all its employees and strives to ensure the quality of its services and the efficiency of development processes. Clients will choose the Company because of the highly-skilled staff with many years of industry-related experience. One of EEC Maintenance LLC's strengths will be the ability to provide comprehensive repair and maintenance solutions that are based on a thorough understanding of the client's needs and requirements. Furthermore, the Company's comprehensive industry-related knowledge, combined with thorough research of clients' operations and goals, will enable EEC Maintenance LLC to expand the business and obtain more clients.



4.3 Superior Customer Services

The Company's personnel will be committed to providing superior customer service. As a result, EEC Maintenance LLC will be able to maintain its long-term customer base and trusting relationships with major airline companies. The Company's ability to satisfy clients on an ongoing basis will generate a high retention rate and allow EEC Maintenance LLC to acquire a loyal customer base by providing excellent before- and after-sales service. Personnel will be able to answer all client questions regarding services, repair and maintenance techniques, and prices. Clients will choose the Company because of its continuous improvement in customer service and its close attention to customers' suggestions.





4.4 Rigorous Quality

EEC Maintenance LLC provides high-quality aircraft maintenance services because of the rigorous quality control steps that are taken during all phases of the maintenance. The Company's services will be performed by experienced and highly trained Aircraft Mechanics, who will use high-quality materials and state-of-the-art equipment. Moreover, EEC Maintenance LLC will adhere to all standards issued by the Federal Aviation Administration and ensure all safety regulations are met. Each maintenance or repair service will be conducted under technical instructions, on time, and on budget. By ensuring the quality of each service provided, and therefore ensuring client satisfaction, EEC Maintenance LLC will be able to expand its client base through word-of-mouth marketing.

5 Marketing and Competitive Features

5.1 Website and Digital Marketing

EEC Maintenance LLC will maintain a user-friendly website. The Company will have a professional agency design and optimize it for better search engine rankings. Search engine optimization of the website will ensure that proper titles, meta descriptions, and keywords, both short- and long-tailed, are present on all pages of the website.

EEC Maintenance LLC will also devote a part of its budget to digital marketing in order to drive traffic to its website. Digital marketing will primarily focus on Google Ads keyword advertising campaigns and the display network. In addition to directly bringing visitors to the website, the digital marketing campaigns will build brand awareness by displaying the Company's logo and ads on the Google display network, and, therefore, numerous websites with visitors interested in EEC Maintenance LLC's services.

Proper search engine optimization and successful digital marketing campaigns will be among the key growth and development factors of the Company's business. Online marketing and promotional efforts will help EEC Maintenance LLC rank higher in search engine result pages, which will lead to an increased number of visitors and, consequently, clients.

The Company will promote the website by conducting keyword marketing campaigns that focus on words and phrases such as *aircraft maintenance* and *sheet metal*.





● aircraft maintenance
Search term



According to Google Trends,⁸ as demonstrated in the graph above, the term *aircraft maintenance* has been showing a high search frequency over the past five years, and this trend is expected to continue.

● sheet metal
Search term



According to Google Trends,⁹ as demonstrated in the graph above, the term *sheet metal* has been showing a high search frequency over the past five years, and this trend is expected to continue.

5.2 Social Media

An ever-expanding social media presence is crucial in the modern business environment. This is why EEC Maintenance LLC will maintain professional pages on social media outlets, such as Facebook, Twitter, LinkedIn, and Instagram. The focus on social media will help the Company build awareness and credibility and allow it to communicate directly with prospective clients and understand their needs. By using social media, EEC Maintenance LLC will build long-lasting relationships with clients and increase awareness of and demand for its aircraft maintenance services.

⁸ www.google.com/trends

⁹ www.google.com/trends





5.3 Review Platforms

Today, many consumers read reviews and ratings of establishments on online review platforms before making a decision to use the services of a certain business. Yelp and Google, for example, are review platforms that can help boost sales and credibility if a company can maintain positive reviews. According to eMarketer,¹⁰ review platforms such as Yelp have more than 80 million unique visitors every month, and many of those visitors write reviews about their experience with a particular business. People can use these sites to find a specific business and read positive recommendations about what they do. The Company will maintain a presence on these databases and strive to offer the best customer service to keep ratings at the highest levels. By adhering to high-quality standards, EEC Maintenance LLC will be able to maximize client satisfaction rates and ensure positive reviews from its clients.

5.4 Word-of-mouth Marketing

Whether through encouraging clients to refer business or by forming relationships with strategic partners, selling services has proven to be an easier task when they come recommended by a reputable source. According to Big Commerce,¹¹ word of mouth remains among the most influential forms of advertising, with 92% of consumers stating that they trust earned media, such as recommendations from friends and family, above all other forms of advertising. The Company will focus on providing exceptional client service and forming productive, lasting bonds with its students in order to build a positive reputation in the market and generate referrals, recommendations, and client reviews and consequently expand its influence.

5.5 Other Marketing Strategies

EEC Maintenance LLC will attend aviation fairs such as SUN N' FUN, and actively participate in such events with carefully planned stands. The SUN N' FUN Aerospace Expo is Florida's largest annual convention of any kind and the second largest air show in the world. The Company's participation in such an event will surely result in increased interest in EEC Maintenance LLC's services and attract a potential client base.

¹⁰ Source: www.emarketer.com/content/how-ratings-and-reviews-guide-consumers

¹¹ Source: BigCommerce, Blog, Word-of-mouth Marketing





6 Key Management and Personnel

6.1 Director and Senior Aircraft Mechanic: Mr. Eduardo Emilio Codognotto

As the Director and Senior Aircraft Mechanic, Mr. Eduardo Emilio Codognotto leads EEC Maintenance LLC's aircraft maintenance organization. He delegates all the tasks to Aircraft Mechanics to perform all contractual requirements. Using his knowledge and experience, he is able to provide guidance to the workforce.

6.1.1 Education

- On December 18, 1994, Mr. Codognotto finished high school in Belo Horizonte (Brazil) and received a professional qualification in aircraft maintenance, becoming an Aircraft Maintenance Technician. This demonstrates that the Petitioner began focusing on the Aircraft Maintenance Industry at a young age and has amassed considerable knowledge since then.

6.1.2 Courses

- From February 1992 to December 1994, Mr. Codognotto attended a technical course in aircraft maintenance in Belo Horizonte (Brazil). There were several modules in this course including electronics, airframe, power plant, strength of materials, organization, and maintenance.
- In 1991, the Petitioner attended a theoretical private pilot course organized by Aero Clube do Estado de Minas Gerais in Minas Gerais (Brazil).
- Mr. Codognotto owns a certificate in AIRFRAME CHT in a power plant issued by the National Civil Aviation Agency (ANAC).
- September 1997 - 5S Course (Refresher)
- November 1997 - Initial Training in Total Quality Management
- May 1998 - King Air 90 Series Course
- May 1998 - PT-6-60 Course
- October 2000 - JT15D-1/1A/1B/4/4B/4D Engine Familiarization
- November 2000 - Citation 500/501/550/551/S550/550B Aircraft Familiarization
- March 2005 - Course in ATR-42 Line & Base Maintenance Training
- August 2005 - Differences between ATR42-300/320 and ATR42/400, ATR42/500 AND ATR72/Series
- August 2006 - Training on MPI (Inspection Procedures Manual)





- July 2007 - Knowledge for Success
- September 2007 - Introduction to FAR's
- September 2007 - Airworthiness Directives
- February 2008 - Materials Receipt
- April 2008 - King Air C90 A/B Familiarization
- April 2008 - Differences King Air C90 A/B - King Air 200/B200
- May 2008 - ZR Lite Performance System and Aft Fuselage Locker System for the Learjet models 35/36 series aircraft (Raisbeck Engineering)
- June 2008 - Manuals, Policies, and Procedures - MGE and MPI
- July 2008 - Learjet 35/A/36/A Familiarization
- July 2008 - Learjet 31/31A Familiarization
- October 2008 - Integration of EHS - Environment, Health, and Safety
- October 2008 - EHS - Proper PPE use - Maintenance Department
- February 2009 - TekLib System - Search and Loan Module
- May 2009 – Property Security
- January 2011 - Familiarization with ATR-42 and ATR-72 Aircraft
- February 2011 - Training on MGM - General Maintenance Manual, MPI - Inspection Procedures Manual, and EO - Notions on Operative Specifications
- April 2011 - Recurrent ATR-42 and ATR-72 - ATR42-300 Family: ATR42-200/300/320 - PCU Family: ATR (PCU) 72-101/102/201/211/212 – PEC Family: ATR (PEC) 42-400/500, and 72/200/210/212/212A (500)
- July 2011 – RII – Required Inspection Items
- August 2011 - Course in MRM Maintenance Resource Management
- October 2011 - Line and Base of ERJ Aircraft 170/190 Families
- January 2012 - Training on MGM - General Maintenance Management, MPI - Inspection Procedures Manual, and EO - Notions on Operative Specifications
- May 2012 - Training on IGI - Incoming Goods Inspection
- November 2012 - ATR-42 / ATR-72 Run-up
- December 2012 - Cargo and Ground Operations Security (AVSEC)
- May 2013 – Training on Special Operations

6.1.3 Professional Experience

- From 1990 to 2015, Mr. Codognotto was a self-employed worker who provided aircraft maintenance services all over Brazil. He also worked outside of regular hours and performed the same tasks as a service provider for other companies in the field, such as Chamone Ind. Aeronáutica, Banjet, Aerobravo Indústria Aeronáutica, and many more. The Petitioner also built several experimental aircraft kits, such as a Van's Aircraft (RV-7 and RV-9) and Aerobravo. Additionally, he pioneered some activities, such as the first installation of an RVSM system in Brazil and became the first person to install Raisbeck kits in Brazil. Working as a self-employed person allowed him to acquire the skills to negotiate deals and acquire numerous contacts in the Aviation Industry that will serve him well in the U.S.





- From 1990 to 1992, the Petitioner worked as a structure (sheet metal) mechanic at Chamone Indústria Aeronáutica, a company headquartered in Belo Horizonte (Brazil) since 1949. Chamone Indústria Aeronáutica has established its reputation as one of Brazil's most traditional and widely recognized aircraft maintenance companies. Mr. Codognotto's responsibilities included preparing aluminum plates for installations, adjustments, or modifications on aircraft, riveting structures, and installing instrument panels. He was also tasked with creating corrosion on structures, as well as adjusting and installing structures such as fairings, windows, and windshields. The Petitioner recovered damaged structures, replaced damaged wings and flying control surfaces, modified structures for installing flight equipment, and read and interpreted technical drawings.
- From 2005 to 2007, Mr. Codognotto worked as a structure (sheet metal) mechanic at Total Linhas Aéreas S.A. In 1996, Total Linhas Aéreas S.A. became certified and started operating as a fully authorized air company, authorized to operate aircraft in any category, and was the largest company regionally. The Petitioner's main responsibilities included implementing technical service bulletins, servicing aircraft on their specific bases, and preparing aluminum plates for installations, adjustments, or modifications on aircraft. He was also responsible for riveting complex structures, handling several types of rivets, preparing and installing instrument panels, detecting corrosion on structures, and, if necessary, treating and removing them.
- From 1997 to 2004, and then later from 2007 to 2010, Mr. Codognotto worked as a structure (sheet metal) mechanic at Líder Táxi Aéreo. Líder Táxi Aéreo, currently known as Líder Aviação, has five business units that provide customers with products and services in the field of executive aviation. The Petitioner was responsible for implementing technical service bulletins, serving aircraft on other bases in the national territory, and preparing aluminum plates for installations, adjustments, or modifications on aircraft. Furthermore, he was tasked with riveting complex structures, handling several types of rivets, and preparing and installing instrument panels.
- From 2010 to 2015, Mr. Codognotto worked as an inspector at Azul Linhas Aéreas/Trip Linhas Aéreas, which is a company engaged in providing services of passenger transportation on a domestic and international level. While working at this company, the Petitioner conducted and performed inspections during the stages of the services on the aircraft, reported and recorded progress and actions taken, and conducted the company's quality management system. He was responsible for supporting team leaders in supervision during the performance of the services, reading and interpreting service performance manuals and procedures, and inspecting materials receipt and storage in accordance with corporate procedure manuals.





- From 2017 to 2020, Mr. Codognotto worked at Tradewinds Aviation Associates, Inc., which is a company that has been operating for more than 25 years providing services in the area of aircraft maintenance and aircraft acquisition consultancy. This company is located at the Fort Lauderdale Executive Airport in Florida. At first, the Petitioner was an aircraft mechanic and was responsible for receiving aircraft in the initial stage, inspecting it according to manuals, changing engines and propellers, and replacing various parts. Mr. Codognotto later started working with sheet metal and inspected and recovered the structures of the Learjet Series, King Air Series, Citation, Cessna Series, and other aircraft. Since the Petitioner now owns EEC Maintenance LLC, his contacts in the Aviation Industry from his time working at this Florida airport will be beneficial.

6.1.4 Projects

- Cockpit adaptations – Mr. Codognotto performed multiple cockpit adaptations in the avionics panel in planes and helicopters, including a King-Air, Learjet 31, 35, and 55, Beechcraft Bonanza, Cessna 182, Piper Airplanes, and many other models. These modifications were made to conform with newer navigation equipment. The Petitioner started performing these types of adaptations in 1990.
- GPS and RVSM (Reduced Vertical Separation Minimum) system installation projects – Mr. Codognotto performed the very first installations of GPS and RVSM systems in Brazil, accompanied by engineers from the company Learjet. These systems played an important role in increasing the air traffic capabilities by allowing planes to have a more precise location to other planes, thus being able to fly closer and avoid accidents in the air.
- Reverse thrust installation projects – This project was innovative at the time it was performed. The reverse thrust system is a temporary reversion of the exhaust to assist the capability of the plane to break and stop. The Petitioner performed this project in 1997 on multiple Learjet (a jet plane), and it was the first time that it was performed outside the U.S.
- ATR-42/ATR-72 fuel injector replacement projects – Mr. Codognotto participated in and inspected the replacement of the fuel injector in 20 airplane models after incidents of fire on engines in some of those aircraft. This replacement was imposed by ANAC (Agencia Nacional de Aviacao Civil), the agency in charge of civil aviation in Brazil. This project was of utmost importance for the safety of passengers and personnel that operated those planes.
- RV's assembly projects - Assembly of experimental aircraft from the U.S. manufacturer VAN's Aircraft. These projects were executed specifically for experienced private owners that wanted a complex and high-performance aircraft, and as such, it demanded complex and specific skills to build the kit. In total, there were three different planes built, two being models RV-7, and one being an RV-9.
- Project BELL-412 – The Petitioner worked on the installation of the first hoist rescue installed outside the manufactures' factory in the U.S. This helicopter is still in use by the Policia Federal Brasileira (Brazilian Federal Law Enforcement). It was completed in 1998, after 45 days of work.





- Learjet series 55 project – In 1996, Mr. Codognotto directly worked on the very first Learjet model 55 that was fully rebuilt in the world, and it was done outside the factory installations in the U.S. This project was carried out at Líder Taxi Aereo in Belo Horizonte (Brazil), accompanied by the manufacturer's engineers. The project took six months to complete and the first flight was a success.
- Raisbeck project – The Petitioner installed kits that consisted of performance upgrades to increase the aerodynamics. At that time, Mr. Codognotto was the only sheet metal specialist in Brazil that performed those installations. These kits were installed to better the performance of the planes, making them faster, more fuel-efficient, and helping minimize maintenance.
- Revitalization and recuperation projects – During his 31 years of professional experience, the Petitioner also recuperated numerous aircraft that were in accidents, incidents, in need of small or big repairs, and basically everything that has to do with sheet metal and structure and is in compliance with manuals and regulations.
- Recent projects – Even during the COVID-19 pandemic, Mr. Codognotto always managed to find new projects since his area of expertise is in such high demand. One of those projects was the reconstruction of a Cessna model 206. The airplane owner had been looking for someone to accept his project for quite some time before being referred to the Petitioner. He thought the damage to his plane was unfixable, but Mr. Codognotto was able to repair it, and it is now in the final stages of final mounting and will soon be flying again.



6.1.5 Inspections

- Received ATR-42/600, ATR-72/600, EMB-170, EMB-190 aircraft for preventive maintenance:
 - Performed aircraft taxiing for a run-up check.
 - Inspected checked structural parts, engines, propellers, landing gears, and overall conditions of aircraft.
 - Tested engines to verify their flight condition (run-up).
 - Tested all equipment associated with flight (flight instruments and engines).
 - Tested systems (hydraulic, pneumatic, and electrical-electronic systems).





- Performed a structural check for any damage caused by human factors and/or natural phenomena (lightning, birds, vehicles, and others).
- Checked fluid levels (engine oil, hydraulic oil).
- Checked tire pressure.
- Checked hydraulic pressure.
- Checked pneumatic and hydraulic accumulators.
- Read and interpreted technical drawings and instruction manuals and technical guidelines.
- Received ATR-42/600, ATR-72/600, EMB-170, EMB-190 aircraft for corrective maintenance:
 - Corrected failures reported by pilots during their flight.
 - Followed up engine changes and corrections.
 - Inspected, changed, and corrected propeller-related problems.
 - Inspected, changed, and corrected landing gear-related problems.
 - Inspected and changed brakes, wheels, and tires.
 - Inspected and changed hydraulic and pneumatic accumulators.
 - Inspected and corrected hydraulic problems.
 - Inspected and corrected pneumatic problems (pressurization).
 - Inspected and corrected the air conditioning system.
 - Incorporated structural changes.
 - Inspected replacements of damaged structural parts.
 - Inspected and repaired the fuel tanks.
 - Inspected and replaced system components (electrical-electronic, pneumatic, and hydraulic components).
 - Inspected and performed corrections in the interiors of aircraft (seats, carpets, and flight attendant cabinets).
 - Inspected and corrected windows, doors, and windshields.
 - Inspected and corrected aircraft painting.
 - Inspected and placed informational signs outside/inside the aircraft.
 - Filled out all the technical documentation associated with each maintenance operation, either preventive or corrective, according to the procedures set by the company and by ANAC - National Civil Aviation Agency.
 - Performed a final check to return the aircraft to their operation by means of taxiing and run-up.
 - Read and interpreted technical drawings and instruction manuals and technical guidelines.
- Received materials (incoming inspection):
 - Checked all the documentation associated with receiving parts and/or materials in accordance with regulatory authority, namely, ANAC (National Civil Aviation Agency), such as: engines, propellers, landing gear, wheels, brakes, windshields, windows, doors, and others.
 - Followed all safety and manual standards in force for aviation.





6.1.6 Reference Letters

- Mr. Benjamin Rawert, a manager at Aircraft Sales Co. LLC, who has been involved in the General Aviation Industry in the U.S. for nearly 30 years, wrote a recommendation letter to support Mr. Codognotto's application. Mr. Rawert says that he got in contact with Mr. Codognotto through a recommendation of his exemplary work. Mr. Rawert states that the U.S. is lacking quality aircraft maintenance personnel, especially specialized skilled technicians for whom there is a huge demand and even greater shortage of talent. Furthermore, Mr. Rawert states that for his current project and mostly all future projects, the Petitioner's services and knowledge are of vital importance to the development of Mr. Rawert's projects and subsequently, business. Mr. Rawert was overly impressed with Mr. Codognotto's ability to perform and that his understanding of the plane parts was astonishing. The Petitioner's work history was impressive, with numerous reconstruction projects of several different models of aircraft proving Mr. Codognotto to be of immense value to Mr. Rawert. Additionally, he claims that for future projects, he intends on purchasing more aircraft in need of reconstruction all over North America, and it would be of high interest to him to have the Petitioner eligible to work, considering his expertise and talent.
- On June 19, 2022, Mr. Pascoal Rodrigues, a certified skydive instructor and owner of Jump Florida Skydiving LLC, wrote a recommendation letter to support Mr. Codognotto's application. Mr. Rodrigues states that even though he had a full maintenance staff, it was almost impossible to find someone in the country to provide structural repair services, which is what the Petitioner is a specialist in, and that he was unable to find anyone until he was referred to Mr. Codognotto at the beginning of 2021. Mr. Rodrigues says that the Petitioner's work was exceptional and of the highest quality, that his knowledge was very extensive, and that every job that he has performed has followed every protocol and regulation. One of the major projects that Mr. Codognotto has worked on was the maintenance of the plane model Cessna 208 Caravan. Mr. Rodrigues claims that it is of significant importance to the industry and the country to have the Petitioner be a part of it. With the lack of professionals, most companies are having a challenging time finding any qualified labor and specialists such as Mr. Codognotto, with his sheet metal expertise and over twenty years of experience in the field.
- On June 21, 2022, Mr. Emerson de Jesus, a pilot and the owner of Galaxy Aviation LLC, wrote a recommendation letter to support Mr. Codognotto's application. According to Mr. Jesus, the Petitioner worked as a senior mechanic for Galaxy Aviation LLC, an aircraft recovery company located at Winter Haven Regional Airport & FBO, Florida, and completed his job exceptionally. Mr. Codognotto was tasked with disassembling, transporting, reconstructing, and reassembling the purchased aircraft. Mr. Jesus claims that before the Petitioner's arrival, the undergoing projects were at a halt due to a lack of specialized labor. Mr. Jesus searched for an adequate candidate to fill in the vacant position for two years, and the only candidate that had the necessary skills was Mr. Codognotto. The Petitioner was recognized as an experienced mechanic but also specialized in sheet metal and structure, which makes him somewhat unique on the job





market. Mr. Codognotto excelled in the reconstruction projects of models such as the Cessna Model 2016, and Cessna 182G-1000. Mr. Jesus finished the letter by stating that the Petitioner is an outstanding professional that any maintenance or reconstruction company would fight over and never let leave.

- On June 23, 2022, Mr. John Francis, the owner of Flying Colors Air Parts, a successful aircraft parts store that has been in the market for 20 years, wrote a recommendation letter to support Mr. Codognotto's application. According to Mr. Francis, in his 30 years of experience in the industry, it was borderline impossible to find employees and service providers such as the Petitioner. Mr. Francis says that his first impression of Mr. Codognotto was that he was a competent and professional individual who demonstrated extensive knowledge of multiple aircraft, helicopter, and executive jet parts. Additionally, Mr. Codognotto's expertise in structure and sheet metal, a very niche sector of aircraft maintenance, enabled him to reconstruct a variety of planes and perform any kind of authorized structural repairs or improvements. Mr. Francis stated that it is of immense interest to him and many other businesses that could benefit from the Petitioner's skills that Mr. Codognotto be granted a visa.

6.1.7 Duties at the U.S. Company

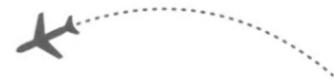
Mr. Codognotto supervises a team of technicians to perform maintenance tasks and investigate faults and failures in aircraft systems. He suggests suitable remedial action to restore them to the required working order. The Petitioner mentors and also conducts training for trainee Aircraft Mechanics and engages in continuous process improvement. Mr. Codognotto performs quality control functions in accordance with state protocols. In quality control, the Petitioner supervises the visual inspection of all deliveries in accordance with stipulated inspection procedures to ensure compliance with the purchase and repair requirements and ensure that non-conformance reports are filed when required. He conducts audits to ensure that all repair work done on systems and components is in accordance with the Original Equipment Manufacturers (OEM) and organization's prescribed procedures and standards and ensures that non-conformances are tracked and actions are taken to rectify them.

6.2 Aircraft Mechanics

EEC Maintenance LLC will hire two Aircraft Mechanics in Year 1, out of whom one will be with sheet metal specialist. By the end of Year 5, there will be 16 Aircraft Mechanics in the Company, out of whom 11 will be sheet metal specialists.

The Aircraft Mechanics will ensure that aircraft operate properly and securely, based on regional safety regulations. Their primary responsibilities will include maintaining and repairing system





components, detecting malfunctions, and fixing them using power and hand tools. The Aircraft Mechanics will perform regular maintenance and inspection of the aircraft systems and equipment. They will repair or replace broken aircraft parts after performing various diagnostic tests to detect malfunctions. These employees will also be responsible for performing troubleshooting and keeping maintenance and repair logs where all malfunctions are noted. All Aircraft Mechanics will be required to know, understand, and apply guidelines from manuals, blueprints, and protocols.

6.3 Personnel Plan

Number of Employees per Position	Year 1	Year 2	Year 3	Year 4	Year 5
Director and Senior Aircraft Mechanic: Mr. Codognotto (full-time)	1	1	1	1	1
Aircraft Mechanics (full-time)	2	6	10	13	16
Total Employees	3	7	11	14	17

Designated Salary per Position	Year 1	Year 2	Year 3	Year 4	Year 5
Director and Senior Aircraft Mechanic: Mr. Codognotto (full-time)	\$65,000	\$68,250	\$71,663	\$75,246	\$79,008
Aircraft Mechanics (full-time)	\$40,000	\$42,000	\$44,100	\$46,305	\$48,620

Personnel Plan	Year 1	Year 2	Year 3	Year 4	Year 5
Director and Senior Aircraft Mechanic: Mr. Codognotto (full-time)	\$65,000	\$68,250	\$71,663	\$75,246	\$79,008
Aircraft Mechanics (full-time)	\$80,000	\$244,000	\$416,200	\$557,010	\$704,861
Total Employees	3	7	11	14	17
Total Payroll Expenses	\$145,000	\$312,250	\$487,863	\$632,256	\$783,868

6.4 Personnel Summary

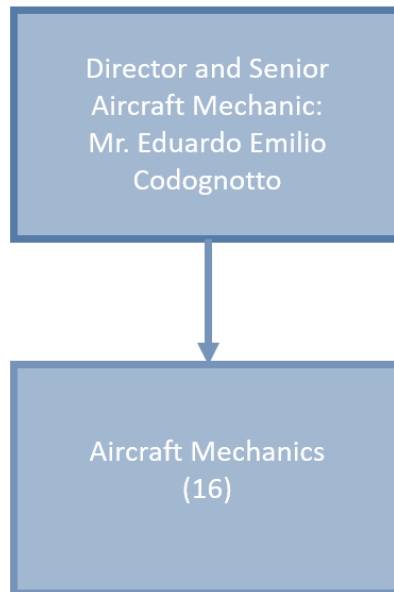
EEC Maintenance LLC will reach a total number of 17 employees in Year 5. The Company expects its payroll expenses to increase from \$145,000 in Year 1 to \$783,868 in Year 5.

Period	Hiring Plan
Already Hired	<ul style="list-style-type: none"> Director and Senior Aircraft Mechanic: Mr. Eduardo Emilio Codognotto, full-time
Year 1	<ul style="list-style-type: none"> Two Aircraft Mechanics, full-time
Year 2	<ul style="list-style-type: none"> Four Aircraft Mechanics, full-time
Year 3	<ul style="list-style-type: none"> Four Aircraft Mechanics, full-time
Year 4	<ul style="list-style-type: none"> Three Aircraft Mechanics, full-time
Year 5	<ul style="list-style-type: none"> Three Aircraft Mechanics, full-time





6.5 The Company's Internal Organizational Chart Year 5



7 Need for the Company's Services

According to the North Central Institute,¹² there is a worldwide shortage of aviation maintenance technicians. For years, the Aviation Industry has been aware of the growing problem. According to a report by the Aeronautical Repair Station Association (ARSA), this shortage could be costing the Aircraft Repair Industry as much as \$2 billion per year. Although many organizations have been working on a solution to the problem, the supply of qualified aircraft technicians is not improving fast enough to meet demand. This is a persisting challenge for major airlines, shipping companies, and service and repair companies.

According to the same source,¹³ although the shortage of aviation maintenance technicians has been a growing problem for years, the emergence of COVID-19 has made matters worse. A quarter of all FAA-certified aviation maintenance technician schools in the U.S. have suspended operations entirely. Of the remaining schools, half estimated that graduations decreased by 25% and new enrollment declined by 28% in 2020. While many schools have added online learning

¹² Source: North Central Institute, The Aviation Maintenance Technician Shortage, www.nci.edu/2020/12/16/the-aviation-maintenance-technician-shortage

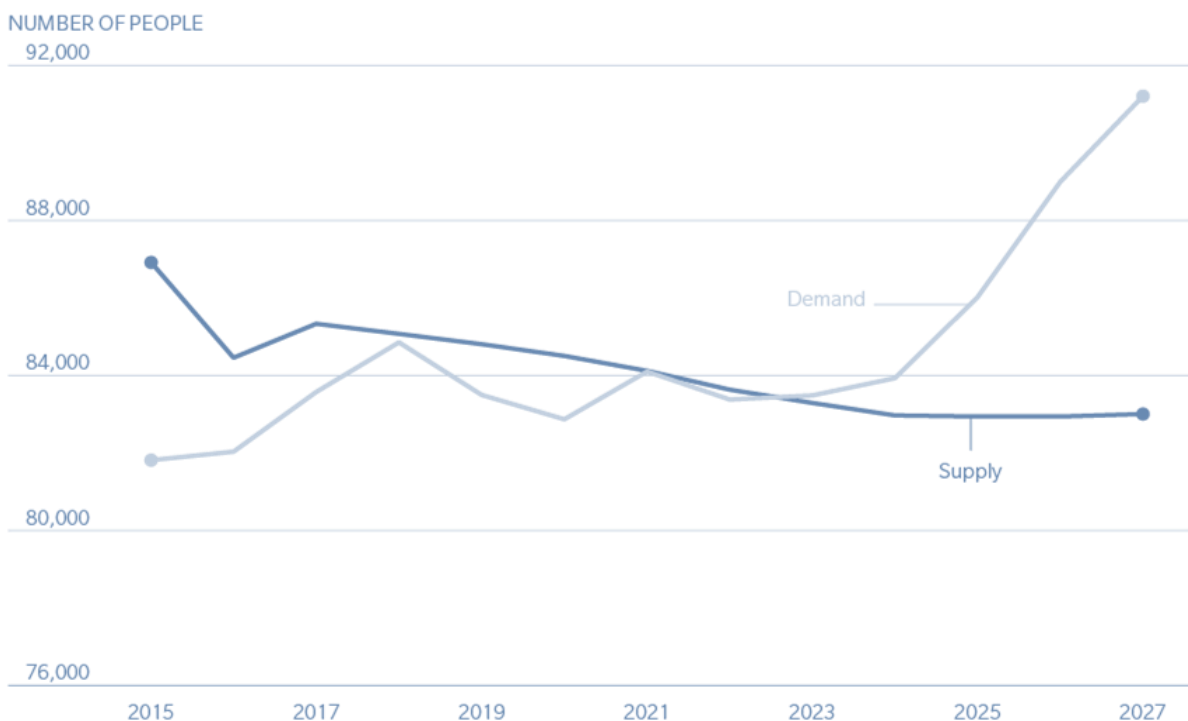
¹³ Source: North Central Institute, The Aviation Maintenance Technician Shortage, www.nci.edu/2020/12/16/the-aviation-maintenance-technician-shortage





options, the fact is that hands-on time is essential when individuals are learning how to repair and maintain an aircraft. Therefore, many schools have had no choice but to delay graduation until their students can complete their lab assignments.

The shortage is, in part, a consequence of an aging global population. Between now and 2027, a record number of maintenance technicians will be eligible to retire as more baby boomers reach their sixties. For example, in the U.S., the median age of aviation mechanics is 51 years old, nine years older than the median age of the broader U.S. workforce as calculated by the U.S. Bureau of Labor Statistics.¹⁴



Source: Oliver Wyman Commercial MRO Maintenance Technician Labor Model

A shortage of aviation mechanics over the period to 2027 threatens the projected expansion and modernization of the global airline fleet. Oliver Wyman projected that the gap between the supply of mechanics and demand for them will develop in the U.S. by 2022 and reach a peak of 9% by 2027.¹⁵

¹⁴ Source: Aviation Growth Is Outpacing Labor Capacity, Oliver Wyman, www.oliverwyman.com/our-expertise/insights/2017/sep/oliver-wyman-transport-and-logistics-2017/operations/aviation-growth-is-outpacing-labor-capacity.html

¹⁵ Source: Aviation Growth Is Outpacing Labor Capacity, Oliver Wyman, www.oliverwyman.com/our-expertise/insights/2017/sep/oliver-wyman-transport-and-logistics-2017/operations/aviation-growth-is-outpacing-labor-capacity.html



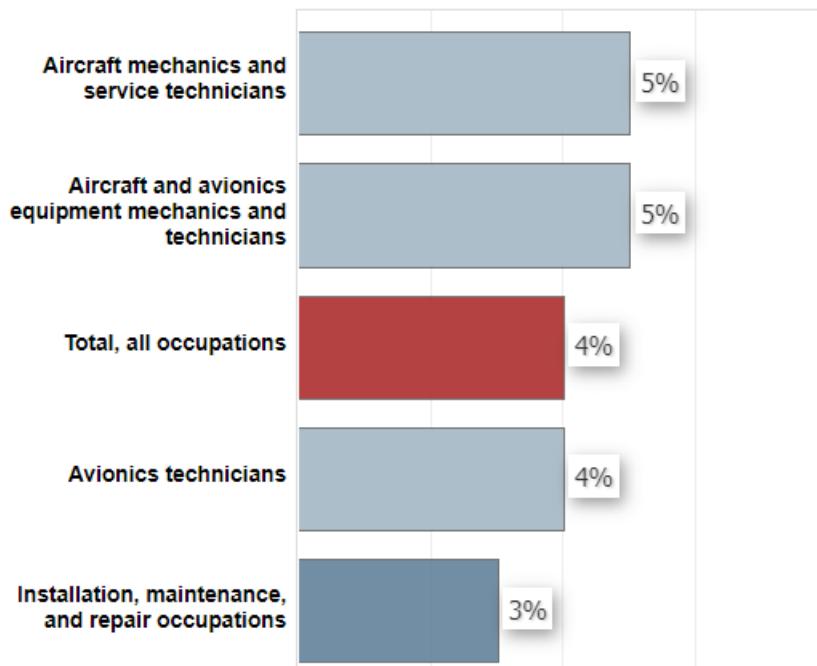


Airplanes require reliable parts and maintenance in order to fly safely. To keep an airplane in operating condition, aircraft and avionics equipment mechanics and technicians perform scheduled maintenance, make repairs, and complete inspections. They must follow detailed regulations set by the FAA that dictate maintenance schedules for different operations. Many mechanics are generalists and work on many different types of aircraft, such as jets, piston-driven airplanes, and helicopters. Others specialize in one section, such as the engine, hydraulic system, or electrical system, of a particular type of aircraft. In independent repair shops, mechanics usually inspect and repair many types of aircraft.

According to the U.S. Bureau of Labor Statistics,¹⁶ overall employment of aircraft and avionics equipment mechanics and technicians is projected to grow 5% from 2019 to 2029, faster than the average for all occupations.

Aircraft and Avionics Equipment Mechanics and Technicians

Percent change in employment, projected 2019-29



Note: All Occupations includes all occupations in the U.S. Economy.

Source: U.S. Bureau of Labor Statistics, Employment Projections program

¹⁶ Source: Bureau of Labor Statistics, U.S. Department of Labor, Occupational Outlook Handbook, Aircraft and Avionics Equipment Mechanics and Technicians, www.bls.gov/ooh/installation-maintenance-and-repair/aircraft-and-avionics-equipment-mechanics-and-technicians.htm





Air traffic is expected to increase gradually over the coming decade and will require additional aircraft maintenance, including maintenance performed on new aircraft.

Employment projections data for aircraft and avionics equipment mechanics and technicians, 2019-29

Occupational Title	SOC Code	Employment, 2019	Projected Employment, 2029	Change, 2019-29	
				Percent	Numeric
Aircraft and avionics equipment mechanics and technicians	—	160,000	167,300	5	7,300
Avionics technicians	49-2091	22,800	23,800	4	1,000
Aircraft mechanics and service technicians	49-3011	137,200	143,500	5	6,300

SOURCE: U.S. Bureau of Labor Statistics, Employment Projections program

To ensure constant availability and accuracy, aircraft systems need to receive corrective and preventive maintenance. The importance of achieving almost absolute security for aircraft operation is, because of the intricate and exclusive complexity of an aircraft, immensely high. MRO services are designed to fulfill the market needs of the Aviation Industry for aircraft or helicopters. For the total aircraft fleet of an airline, MRO activities make up roughly 10% of total operating costs. Therefore, the MRO market growth is closely tied to the Aviation Industry globally. The MRO market worldwide is forecasted to increase continuously until 2027. From 2017 to 2026, most of the MRO services demand is estimated to be for engine maintenance and components of an aircraft in North America. Since the aviation market is growing globally at an exponential rate, so follows the MRO market.¹⁷

Aircraft maintenance is one of the most important activities that aircraft airlines and owners should maintain and never underestimate. This is a set of activities that includes the inspection, reformation, and repair of an aircraft, not only for large planes but for smaller aircraft as well. The rules in aircraft manuals set the standard for maintaining aircraft in order to uphold compliance. No airline or company is exempt when it comes to this.

Aircraft maintenance is highly regulated in every part of the world due to various reasons, including but not limited to:¹⁸

- Avoiding lost flights because of failure
- Maintaining optimum performance
- Ensuring passenger safety
- Extending the life of the aircraft

¹⁷ Source: Statista, Aircraft MRO Market Size Forecast - Engine MRO 2021-2031

¹⁸ Source: www.airportworld.aero

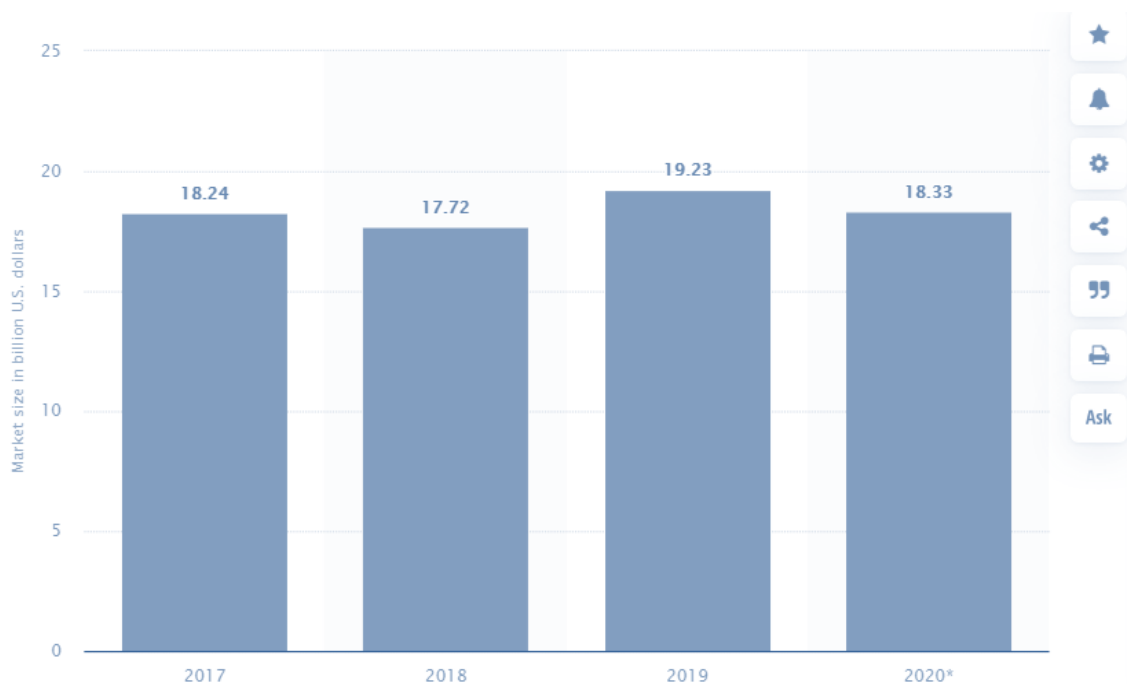




The Air Travel Industry is one of the largest economic contributors on a global scale and aircraft maintenance is the backbone of air travel. Aircraft maintenance is one of the most important aspects of the Aviation Industry. It encompasses all the measures and activities performed to ensure that aircraft are safe and fit to fly, making it a vital component of air travel.

Airplane maintenance is essential to ensure air traffic is safe, but also to avoid incurring unnecessary expenses. Aircraft maintenance must be systematic and steady, as airplanes require regular check-ups to guarantee that they are safe to operate.

In 2020, the total size of aircraft maintenance, repair, and overhaul services in the U.S. reached over \$18 billion.¹⁹



The U.S. is the leading producer of commercial, defense, and general aviation aircraft. The increase in spending on aircraft development is further propelling the growth of the aircraft and aircraft MRO markets. The airframe and engine MRO segments are expected to witness significant growth, in terms of revenue share, during the forecast period. The growth in the aforementioned segments is driven by defense aviation, as the current average age of a few aircraft, such as bombers and high-altitude surveillance aircraft, is more than 50 years. The Aircraft MRO Industry in the U.S. is heavily investing in the development and integration of new

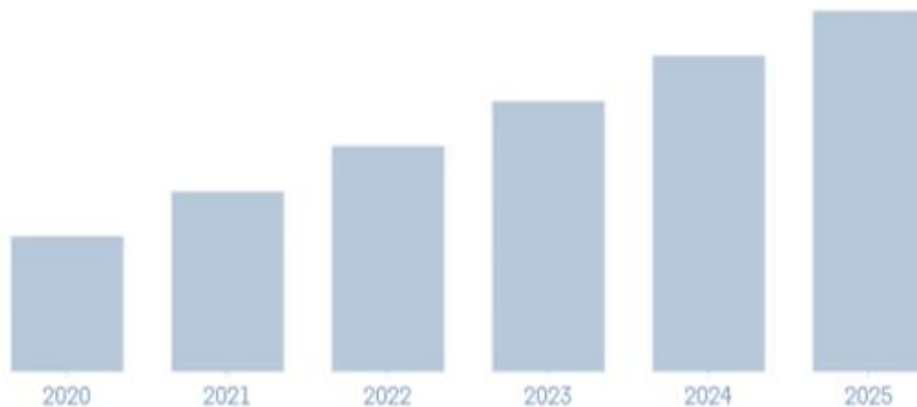
¹⁹ Source: www.statista.com/statistics/1173204/aircraft-mro-service-market-size-us





technologies, such as artificial intelligence, robotics, augmented reality, drone inspection, intelligent machines, and tools. General Electrics' smart glass is used with a Wi-Fi torque wrench that instructs mechanics on the amount of force to be applied during maintenance operations. Such developments may support the growth of the aircraft MRO market in the U.S.²⁰

North America Aircraft MRO Market: Revenue Share in USD million, United States, (2020 - 2025)



Source : Mordor Intelligence



North America has the largest fleet of commercial, general, and military aircraft in the world, and they require regular MRO services for operational availability. The presence of several aircraft OEMs in the U.S. makes the region the highest aircraft producer globally. Several contracts and agreements are regularly signed between aircraft MRO service providers and airlines, defense agencies, etc.

The U.S. economic conditions are expected to continue improving over the coming years. Consequently, companies and consumers are expected to be better able to afford vacations and business trips via air travel. Domestic trips by U.S. residents are expected to recover substantially, rising 132.5% in 2021 alone, while international trips by U.S. residents will increase 138.7%. As a result, airlines will increase aircraft use, thereby increasing flying hours. The subsequent increase in aircraft wear and tear, and therefore, mandated checkups, is projected to lead to higher demand for industry services and an increase in the U.S. mainline carrier aircraft fleet. Therefore, the potential market for industry services is expected to expand during the outlook period.

²⁰ Source: www.mordorintelligence.com/industry-reports/north-america-aircraft-mro-market





Industry operators are also anticipated to benefit from continued MRO outsourcing by airlines as they attempt to improve efficiency.

8 Mr. Codognotto's National-level Impact

Mr. Codognotto is an expert Aviation Maintenance Technician with more than 30 years of experience in the Aircraft Maintenance, Repair, and Overhaul Industry. Throughout his professional career, the Petitioner has been able to gain thorough knowledge and skills related to the maintenance and repair of various types of aircraft. His educational background and exceptional professional experience have allowed him to develop an exclusive set of skills, which will now prove instrumental in allowing him to further his endeavor in the U.S.

Benefits to the U.S.

Knowledge Transfer: According to *The Washington Post* and the Transamerica Center for Retirement Studies,²¹ approximately 10,000 Baby Boomers turn the retirement age of 65 each day for the next 19 years. A projected increase in retirement will create a deficit in the skilled workforce needed to perform high-quality integrated communication services. According to Korn Ferry,²² the U.S. faces one of the most alarming talent crunches of any country worldwide. This is partly because America's population is aging rapidly. U.S. job vacancies hit a record high last year, exceeding six million openings per month. Analysts attributed the nation's hiring crunch to a tight labor market and paucity of workers with the right skills and experience. And as demand rises, supply will decline. The labor force participation rate is expected to fall over the next decade, dipping from 62% in 2020 to 60% in 2030. By 2030, the U.S. could experience unrealized revenue of \$1.748 trillion due to labor shortages, equivalent to 6% of its entire economy. This is the highest figure of all the markets examined by Korn Ferry and almost a fifth of the total revenue shortage across all 20 economies.

Furthermore, the U.S. has an overall surplus of Level B (mid-skilled) and Level C (low-skilled) workers at each of the three milestones, but the deficit of Level A (highly skilled) workers, such as Mr. Codognotto, is expected to reach more than 6.5 million people by 2030. The Petitioner's

²¹ Source: *The Washington Post* and the Transamerica Center for Retirement Studies

²² Source: Korn Ferry, Future of Work, The Global Talent Crunch, 2019

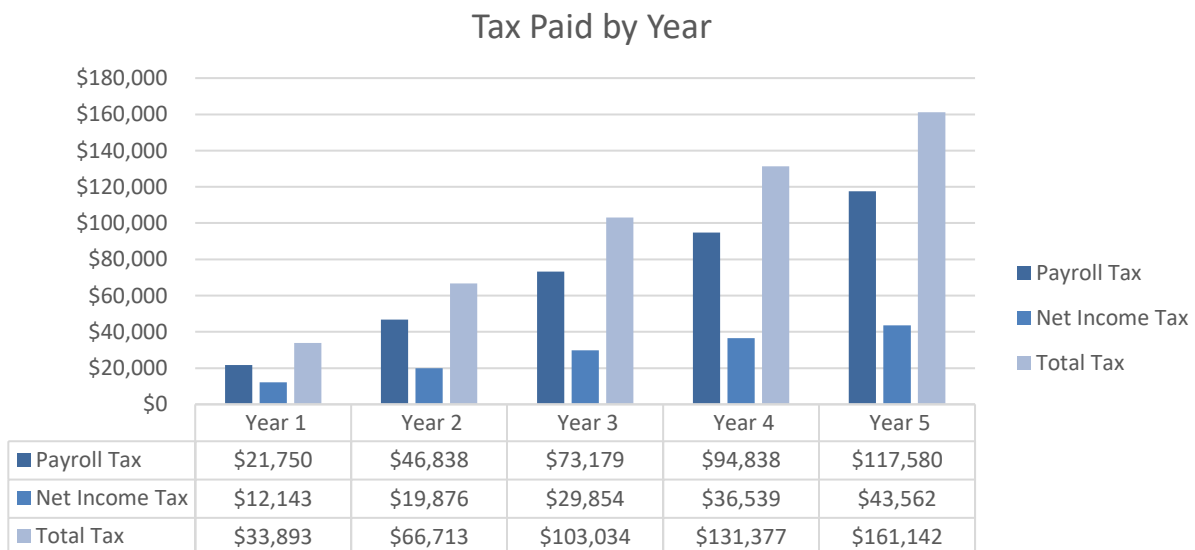




background and his willingness to transfer his skills and knowledge to the U.S. market will help create qualified aircraft mechanics, therefore contributing to fulfilling Aviation Industry needs and benefiting the U.S. economy. The Petitioner will open an aircraft maintenance school in the future, where more people will be able to take specialized courses in aircraft maintenance.

Financial and employment benefits: In addition to generating revenues within the country and indirectly creating employment opportunities, as a service provider in the Aircraft Maintenance, Repair, and Overhaul Industry, Mr. Codognotto will also contribute to industry revenue growth. The Petitioner will draw on his considerable experience as an Aviation Maintenance Technician working for major international airlines to provide expert MRO services, thus benefiting the industry with his rare skills. The forecasted growth of the industry pays dividends for all U.S. citizens by increasing tax revenues to the federal and state governments and increasing the funds available to spend on hospitals, schools, roads, and other essential services. Additionally, by providing high-quality MRO services, the Petitioner will support the continuous growth of the U.S. Air Transportation Industry, which is an important enabler to achieving economic growth and development. Air transport facilitates integration into the global economy and provides vital connectivity on a national, regional, and international scale. It helps generate trade, promote tourism, and create employment opportunities.

By the end of Year 5, EEC Maintenance will have hired a total of 17 employees, stimulating the U.S. economy and increasing the amount of taxes paid. Over the next five years, the Company expects to make tax payments to the U.S. Government 3, as presented in the chart below:





By intensifying the Company's high-level airport maintenance services, Mr. Codognotto's endeavor will also contribute to the growth of the U.S. economy by supporting job creation and raising overall living standards.

Each industry has backward linkages to economic sectors that provide the materials needed for the industry's output, and each industry has forward linkages to the economic sectors where the industry's workers spend their income. Therefore, in addition to the jobs directly supported by industry, a large number of indirect jobs may also be supported by that industry. The subtraction or addition of jobs and output in industries with strong backward and forward linkages to other economic sectors can cause large ripple effects.

A specific approach to measure the indirect impact of EEC Maintenance LLC in terms of job creation, earnings, and output is to apply the Regional Input-Output Modeling System (RIMS II). The RIMS II regional economic model is a tool used by investors, planners, and elected officials to objectively assess the potential economic impacts of various projects. This model produces multipliers that are used in economic impact studies to estimate the total impact of a project on a region. The idea behind the results of RIMS II is that an initial change in economic activity results in other rounds of spending. RIMS II is based on a set of national input-output (I-O) accounts that show the goods and services produced by each industry and the use of these goods and services by industries and final users.

RIMS II multipliers are based on 2012 national benchmark input-output data and 2018 regional data. These multipliers were first released in June 2020 by the Bureau of Economic Analysis (BEA).²³ The following table shows the multipliers for businesses operating in the Professional, Scientific, and Technical Services Industry in Florida.



²³ The Bureau of Economic Analysis (BEA) is an independent, principal federal statistical agency that promotes a better understanding of the U.S. economy by providing timely, relevant, and accurate economic accounts data in an objective manner.





The following table shows the BEA’s RIMS II multipliers for the Maintenance and Repair Industry in Florida.

Total Multipliers - Detailed Industries Region: Florida (Type II) Series: 2012 U.S. Benchmark I-O data and 2018 Regional Data			
		Final-demand - Output (\$)	Final Demand Employment - (number of jobs)
23030A	Maintenance and Repair	2.0787	13.8110

According to conclusions that were derived using BEA’s RIMS II multipliers, by operating in the Maintenance and Repair Industry in Florida, the Company will:

- Generate a final-demand impact in employment, equivalent to 234 jobs in Year 5, as it will reach a total of 17 in-house employees as shown in the Personnel Tables (Section 6.7)
- Generate a final demand impact in output, equivalent to \$2,271,121 as its total revenues will reach \$1,092,568 in the same year, as shown in the Sales Forecast Table (Section 9.1).

As an expert aircraft maintenance technician, Mr. Codognotto is well-positioned to advance his endeavor, which perfectly aligns with the second priority and will help to expand the nation’s economic prosperity and opportunity by providing crucial contributions to the U.S. Aviation Industry, as well as by transferring valuable industry-related knowledge gained throughout his long and prolific career. According to the National Security Strategy to Advance America’s Interests, it is necessary to rejuvenate the American economy for the benefit of workers and companies, which is essential to restoring the U.S.’s national power. That includes the Aircraft Maintenance, Repair, and Overhaul Industry and the talent shortage therein that will threaten the U.S. economy in the coming years. By transferring his knowledge, the Petitioner will help train a new generation of aircraft mechanics. Therefore, the national interest in Mr. Codognotto’s contribution to the U.S. is sufficiently urgent to warrant forgoing the labor certification process.





9 Financial Forecasts

9.1 Sales Forecast

Sales Forecast	Year 1	Year 2	Year 3	Year 4	Year 5
Sales					
Aircraft Maintenance	\$215,000	\$430,000	\$662,200	\$847,616	\$1,042,568
Aircraft Rental	\$30,000	\$35,000	\$40,000	\$45,000	\$50,000
Total Sales	\$245,000	\$465,000	\$702,200	\$892,616	\$1,092,568

9.2 Profit and Loss

Pro Forma Profit and Loss	Year 1	Year 2	Year 3	Year 4	Year 5
Sales	\$245,000	\$465,000	\$702,200	\$892,616	\$1,092,568
Gross Margin	\$245,000	\$465,000	\$702,200	\$892,616	\$1,092,568
Gross Margin %	100%	100%	100%	100%	100%
Operating Expenses					
Payroll	\$145,000	\$312,250	\$487,863	\$632,256	\$783,868
Rent	\$17,892	\$18,787	\$19,726	\$20,712	\$21,748
Professional Fees	\$7,800	\$8,190	\$8,600	\$9,029	\$9,481
Maintenance	\$1,000	\$1,050	\$1,103	\$1,158	\$1,216
Safe	\$2,280	\$2,394	\$2,514	\$2,639	\$2,771
Payroll Taxes	\$21,750	\$46,838	\$73,179	\$94,838	\$117,580
Public Utility Services	\$1,800	\$1,890	\$1,985	\$2,084	\$2,188
Marketing	\$5,000	\$5,250	\$5,513	\$5,788	\$6,078
Equipment and Supplies	\$2,000	\$2,100	\$2,205	\$2,315	\$2,431
Total Operating Expenses	\$204,522	\$398,748	\$602,686	\$770,820	\$947,361
Profit Before Interest and Taxes	\$40,478	\$66,252	\$99,514	\$121,796	\$145,207
EBITDA	\$40,478	\$66,252	\$99,514	\$121,796	\$145,207
Taxes Incurred	\$12,143	\$19,876	\$29,854	\$36,539	\$43,562
Net Profit	\$28,335	\$46,376	\$69,660	\$85,257	\$101,645

9.3 Balance Sheet

Pro Forma Balance Sheet	Year 1	Year 2	Year 3	Year 4	Year 5
Assets					
Current Assets					
Cash and Other Current Assets	\$28,335	\$74,711	\$144,371	\$229,628	\$331,273
Total Current Assets	\$28,335	\$74,711	\$144,371	\$229,628	\$331,273
Total Assets	\$28,335	\$74,711	\$144,371	\$229,628	\$331,273
Capital	Year 1	Year 2	Year 3	Year 4	Year 5
Paid-in Capital	\$35,000	\$35,000	\$35,000	\$35,000	\$35,000
Retained Earnings	(\$35,000)	(\$6,665)	\$39,711	\$109,371	\$194,628
Earnings	\$28,335	\$46,376	\$69,660	\$85,257	\$101,645
Total Capital	\$28,335	\$74,711	\$144,371	\$229,628	\$331,273
Net Worth	\$28,335	\$74,711	\$144,371	\$229,628	\$331,273

