



NATIONAL MEDIATION BOARD
WASHINGTON, DC 20572

(202) 692-5000

In the Matter of the
Application of the

ASSOCIATION OF FLIGHT
ATTENDANTS - CWA

alleging a representation dispute
pursuant to Section 2, Ninth, of
the Railway Labor Act, as
amended

involving employees of

PINNACLE AIRLINES, INC. / THE
FORMER MESABA AVIATION,
INC. / COLGAN AIR

39 NMB No. 35

CASE NO. R-7324
(File No. CR- 7017)

FINDINGS UPON
INVESTIGATION

April 18, 2012

This determination addresses the application filed pursuant to the Railway Labor Act (RLA)¹ by the Association of Flight Attendants-CWA (AFA-CWA). AFA-CWA filed an application requesting the National Mediation Board (NMB or Board) to investigate a representation dispute involving the Flight Attendants of Pinnacle Airlines, Inc. (Pinnacle), Mesaba Aviation, Inc. (Mesaba) and Colgan Air, Inc. (Colgan) (“the Carriers” collectively)². AFA-CWA currently represents the craft or class of Flight Attendants at Mesaba. The United Steelworkers (USW) represents the Flight Attendants at both Pinnacle (pursuant to a Board certification) and Colgan (pursuant to voluntary recognition). AFA-CWA requests the NMB to investigate whether Pinnacle, Mesaba and Colgan are operating as a single transportation system.

¹ 45 U.S.C. §151, et. seq.

² The Carriers are subsidiaries of Pinnacle Airlines Corp. (Pinnacle Corp.).

The Board's investigation establishes that Pinnacle, Mesaba and Colgan are operating as a single transportation system for the craft or class of Flight Attendants.

PROCEDURAL BACKGROUND

On June 9, 2011, AFA-CWA filed an application alleging a representation dispute involving the craft or class of Flight Attendants. AFA-CWA represents the Flight Attendants at Mesaba. USW represents the Flight Attendants at Pinnacle and at Colgan.

The application was assigned NMB File No. CR-7017. The Board requested that the Carriers provide information regarding its operations and assigned Eileen Hennessey to investigate. On June 30, 2011, the Carriers filed a position statement. On July 15, 2011, AFA-CWA and USW each filed a position statement. The Carriers supplemented its position statement on September 30, 2011 and January 3, 2012. AFA-CWA supplemented its response on August 31, 2011 and October 13, 2011. USW supplemented its position statement on October 13, 2011.

ISSUES

Are Pinnacle, Mesaba and Colgan operating as a single transportation system? If so, what are the representation consequences?

CONTENTIONS

The Carriers

At the time of its initial response to the Board, the Carriers argued that the AFA-CWA's single carrier petition was premature. The Carriers stated that "the tentative plan was that, at some point in time, the Mesaba jet aircraft would be transferred to Pinnacle and the propeller operations of Mesaba and Colgan would be combined." Therefore, the Carriers stated that Mesaba and Colgan might constitute a single system at some point in the future but that Pinnacle "would remain a separate carrier from the combined Mesaba/Colgan operation." The Carriers "emphasized that the contemplated transaction had not yet occurred, and that it was unclear when it would occur and if it would be completed precisely in the fashion that was envisioned at the time."

In its September 30, 2011 submission to the Board, Pinnacle Corp. modified its initial plan. W. Christopher Harrison, Vice President of Labor

Relations Pinnacle Corp., stated Pinnacle Corp. planned to transfer Mesaba's jet aircraft to Pinnacle, Mesaba personnel affected by that transfer would be offered positions at Pinnacle and Mesaba would discontinue its propeller flying, cease operations and surrender its operating certificate to the FAA. Harrison stated that "[t]his will result in Pinnacle Corp. having two 'end-state' carriers, one which will perform solely jet aircraft flying and one which will provide solely propeller aircraft flying."

In its final submission to the Board on January 3, 2012, the Carriers stated that any single carrier analysis should exclude Mesaba because effective January 4, 2012, Mesaba ceased operations. The Carriers state that the end result is that Pinnacle Corp. operates two end-state carriers- Pinnacle and Mesaba/Colgan -which are operated separately. Specifically, the Carriers state Pinnacle and Mesaba/Colgan will fly different aircraft with different markings and insignia; fly for different code share partners (Delta for the jet operations and United/Continental and US Airways in the case of the propeller operation); fly different schedules as dictated by their code share partners; have separate websites; be responsible for their own hiring; and have separate department heads and managers for Operations, Maintenance, Flight Operation, Inflight, Safety, and Dispatch.

AFA-CWA

AFA-CWA argues that the Carriers are operating as a single transportation system. AFA-CWA states that Pinnacle Corp. exercises complete control over all aspects of carrier operations at its subsidiaries. Pinnacle Corp. moves aircraft between Mesaba and Pinnacle; conducts meetings with labor union representatives from all three carriers; and forms "transition teams" to integrate company practices at all three carriers. In addition, AFA-CWA argues that Pinnacle Corp. made the decision to merge Colgan/Mesaba and merge the jet flying of Mesaba with Pinnacle. Furthermore, AFA-CWA states that the former Mesaba President negotiated the terms and conditions of employment for the AFA-CWA represented Flight Attendants with the USW, the union that represents the Flight Attendants at Pinnacle. These actions, according to AFA-CWA, reflect a coordinated strategy involving the management of all three carriers working together to enact a corporate plan directed by Pinnacle Corp.

USW

USW contends that Pinnacle, Mesaba, and Colgan do not currently constitute a single transportation system and AFA-CWA's application should be dismissed. USW states that the three Carriers do not publish combined

schedules or combined routes and they are not in the process of combining operations into a single transportation system. While the Carriers have long-range plans for corporate restructuring to yield two separate end-state carriers, those end-state carriers will operate separately, under different management, employing separate Flight Attendant workforces, serving different code share partners, and fly separate schedules and routes with entirely different kinds of aircraft. USW also notes that the Carriers do not have common marketing, markings or insignia; have not integrated essential operations such as scheduling or dispatching; do not have centralized labor and personnel operations with respect to the Flight Attendants; do not have a combined Flight Attendant workforce; do not have standardized uniforms for Flight Attendants; and do not have a substantially combined or common management, corporate officers or board of directors.

FINDINGS OF LAW

Determination of the issues in this case is governed by the RLA, as amended, 45 U.S.C. §§ 151-188. Accordingly, the Board finds as follows:

I.

Pinnacle and Colgan are common carriers as defined in 45 U.S.C. § 181. Prior to its shut-down, Mesaba was a common carrier as defined in 45 U.S.C. § 181.

II.

AFA-CWA and USW are labor organizations as provided by 45 U.S.C. § 152, Ninth.

III.

45 U.S.C. § 152, Fourth, gives employees subject to its provisions, “the right to organize and bargain collectively through representatives of their own choosing. The majority of any craft or class of employees shall have the right to determine who shall be the representative of the craft or class for the purposes of this chapter.”

IV.

45 U.S.C. § 152, Ninth, provides that the Board has the duty to investigate representation disputes and to designate who may participate as

eligible voters in the event an election is required. In determining the choice of the majority of employees, the Board is “authorized to take a secret ballot of the employees involved or to utilize any other appropriate method of ascertaining the names of their duly designated and authorized representatives . . . by the employees without interference, influence, or coercion exercised by the carrier.”

STATEMENT OF FACTS

A. Background and Corporate Transactions

Pinnacle is a regional air carrier that provides passenger feed to Delta Air Lines as part of the Delta Connection team. Pinnacle operates from hubs in Memphis, Minneapolis/ St. Paul, Detroit, Atlanta, and New York-JFK. Pinnacle operates regional jets: the 50 seat CRJ-200 LR and the 76 seat CRJ-900. Its corporate headquarters are located in Memphis. Pinnacle is a wholly owned subsidiary of Pinnacle Corp. which since 2003 has been a publically traded company.

Colgan provides regional passenger feed for three major carrier partners: United Airlines, Continental Air Lines and US Airways. It operates a fleet of 62 propeller aircraft: Saab 340s and Q-400s. Colgan has hubs in Boston, Houston, Newark and Washington-Dulles. In 2007, Colgan was acquired by Pinnacle Corp. and Colgan’s headquarters were relocated from Manassas, Virginia to Memphis, Tennessee.

Until Mesaba ceased operations on January 4, 2012, it provided regional passenger service as a Delta Connection carrier from Delta hubs in Detroit, Minneapolis/St. Paul, Memphis, Atlanta, and Salt Lake City. Mesaba operated both regional jets and propeller aircraft all of which were leased to Mesaba. Mesaba also provided regional feed for US Airways. Mesaba formerly was owned by Delta and in July 2010, Delta sold Mesaba to Pinnacle Corp. Mesaba was headquartered in Eagan, Minnesota.

The Carriers state that the Mesaba-AFA-CWA collective bargaining agreement (CBA) provides that, in the event that Mesaba merges with or acquires another airline, or is acquired by another airline, provision will be made to integrate the seniority lists in a fair and equitable manner, including arbitration. However, the Carriers maintain that this provision is not triggered by an asset transfer. Further, the Carriers state that although the Mesaba-AFA-CWA CBA does not give Flight Attendants affected by the asset transfer any right to employment with the transferee, Pinnacle has been willing to offer positions to the affected Mesaba Flight Attendants. In addition, Pinnacle

entered into discussions with the USW regarding whether it would agree to integrate former Mesaba Flight Attendants into the Pinnacle seniority list with some level of credit for their Mesaba seniority. USW agreed to give the former Mesaba Flight Attendants one year of Pinnacle seniority credit for every three years at Mesaba, to integrate them into the Pinnacle seniority list accordingly, and to give them full credit for longevity, sick leave and vacation accrual.

The Carriers state that Mesaba's shutdown is permanent and it intends to surrender its operating certificate within the next few months. The Carrier further states that in the future, Colgan's name will be changed to Mesaba, but it will continue to operate under the Colgan FAA operating certificate. According to Harrison, "within Pinnacle Corp. we often refer to the end-state propeller operation as 'Colgan/Mesaba.'"

AFA-CWA's application covers a total of 1,863 employees. USW represents Pinnacle's 825 Flight Attendants and Colgan's 444 Flight Attendants. The 594 former Mesaba Flight Attendants are represented by AFA-CWA.

B. Management

Pinnacle and Colgan have separate websites. However, both the Pinnacle website and the Colgan website link to Pinnacle Corp.'s website and the subsidiaries' website links to Pinnacle Corp.'s Board of Directors and management as the management team for the subsidiaries. According to Pinnacle Corp.'s web site, it holds itself out as follows:

Pinnacle Airlines Corp. (NASDAQ: PNCL), a \$1 billion airline holding company with 8,000 employees, is the parent company of Pinnacle Airlines, Inc. and Colgan Air, Inc. Flying as Continental Express, Delta Connection, United Express and US Airways Express, Pinnacle Airlines Corp. operating subsidiaries operate 199 regional jets and 77 turboprops on more than 1,540 daily flights to 188 cities and towns in the United States, Canada, Mexico and Belize. Corporate offices are located in Memphis, Tenn., and hub operations are located at nine major U.S. airports.

Pinnacle Corp. lists the following as the senior level management for both the holding company and its subsidiaries: Sean E. Menke, President and Chief Executive Officer; John Spanjers, Senior Vice President and Chief Operating Officer; Brian T. Hunt, Senior Vice President and General Counsel; Bill Donohue, Vice President, Maintenance and Technical Services; L. Russell Elander III, Vice President, PinnPro Professional Ground Services; Eric T.

Epperson, Vice President, Corporate Culture and Communications; Keith Glazier, Vice President, Safety and Security; Lawrence Grant, Vice President, Purchasing and Contracts; W. Chris Harrison, Vice President, Labor Relations; Anthony D. McDuffie, Vice President, Finance and Controller; Mary Ann Morrow, Vice President, People; Jayne Pendergast, Vice President, Information Technology; D. Philip Reed Jr., Vice President, Network Scheduling, Operations Analytics and Performance Engineering; Joseph Restifo, Vice President, Flight Operations; Patrick Ryan, Vice President, Manpower Planning and Staffing; Tom Schmidt, Vice President, Financial Planning & Analysis and Budgets; Barbara Setsvold, Vice President, Inflight Services.

The Inflight departments at Pinnacle and Colgan have separate management and personnel. Each Carrier's Flight Attendants only work the aircraft of their own carrier. Each Carrier has its own Inflight department head (either a Vice President or Director), and a separate management structure underneath the department head.

C. Labor Relations/Personnel Functions

The Air Line Pilots Association, International (ALPA) represents the Pilots at the Carriers. Following Pinnacle Corp.'s acquisition of Mesaba, ALPA and all three carriers negotiated a joint collective bargaining agreement (CBA) that covers the Pilots at all three carriers (Pinnacle, Colgan and the former Mesaba). This CBA went into effect on February 18, 2011 and permits pilots to bid for vacancies at all three carriers. ALPA integrated the seniority lists on the Carriers in June 2011.

The Flight Dispatchers at Pinnacle and Mesaba are represented by the Transport Workers Union of America (TWU) and the Flight Dispatchers at Colgan are unrepresented. Pinnacle's Fleet Service Employees are represented by the USW, Colgan's Fleet Service Employees are unrepresented and the former Mesaba did not employ Fleet Service Employees. Mechanics and Related Employees are unrepresented at Pinnacle. The Aircraft Mechanics Fraternal Association represents the former Mesaba Mechanics and Related Employees.

Dan Copp is the Labor Relations Manager for Colgan and is responsible for all employee groups, union and non-union, at Colgan except for Pilots. Don Seago is the Labor Relations Manager for all work groups at Pinnacle except for the Pilots. Pinnacle Corp. hired a Labor Relations Manager, Alan English whose sole responsibility is for the Pilots at both Colgan and Pinnacle. Copp, Seago and English report to Vice President of Labor Relations for Pinnacle

Corp., W. Christopher Harrison. The Carriers are each responsible for their own hiring.

Certain functions, such as payroll and accounts payable are performed by Pinnacle Corp. for all three Carriers. Effective January 1, 2012, Pinnacle Corp. implemented a consistent compensation and benefits package for the employees of all of its airline subsidiaries including a common 401(k) plan; common medical and prescription benefits; and the same extended sick leave, long term disability, and basic life insurance coverage.

D. Marketing

Pinnacle and Colgan each have a website. However, content on each website also links to Pinnacle Corp.'s website and Pinnacle Corp.'s website provides links to each of its subsidiaries' websites. The Carriers' operations are marketed by their respective major carrier partners. On the Carriers' websites, clicking to purchase a ticket takes one to a link for the particular code-share partner.

E. Routes and Schedules

The Carriers' fly different routes and schedules which are dictated by their code-share partners.

F. Uniforms

Flight Attendants wear different uniforms based on the code-share partner for whom they fly.

G. Equipment

The Carriers' aircraft are marked with the livery of the code share partner within whose service the aircraft is being used. Pinnacle and Colgan have separate code share partners. When the Mesaba jet aircraft was transferred to Colgan, a sticker indicating that the aircraft is being operated by Pinnacle replaced the sticker that says the aircraft is being operated by Mesaba.

H. Insignia and Logos

There were no changes in corporate logos or insignia. Pinnacle Corp. and each of the Carriers have their own logo.

DISCUSSION

I.

Mesaba

The Carriers argue that any single carrier analysis should exclude Mesaba because effective January 4, 2012 Mesaba ceased operations. The Carriers state that the end result is that Pinnacle Corp. operates two end-state carriers- Pinnacle and Mesaba/Colgan- which are operated separately and fly different aircraft. The Carrier's argument that the Board should only consider entities that are currently operating in its system analysis has been rejected by the Board previously.

There is long-standing Board precedent distinguishing between the representation consequences of carrier growth due to internal expansion and the representation consequences resulting from a merger. *Amtrak*, 13 NMB 412 (1986).

Implicit in the issuance of a carrier-wide certification is the understanding that subsequent to certification the craft or class could expand or shrink. Indeed, it would be contrary to one of the primary purposes of the Act, the promotion of labor-management stability, if representation elections among the new employees were conducted every time a carrier internally expanded. *Such internal expansion must, of course, be distinguished from a carrier's growth resulting from a merger where well established Board procedures govern.*

Id. at 417.

The Board recently cited to *Amtrak* in a case similar to the present case, *Republic Airlines et al*, 39 NMB 3 (2011) (*Republic Flight Attendants*). The Board stated in the *Republic Flight Attendant* case that

a situation of internal expansion ... is to be distinguished from a merger situation like RAH's acquisition of Frontier, and the former Lynx and Midwest. In the instant case, Lynx and Midwest were acquired by RAH A single transportation analysis properly applies to the facts presented in the IBT's application. See Board Representation Manual Section 19.

Id. at 12-13.

II.

The Board's Authority

45 U.S.C. § 152, Ninth, authorizes the Board to investigate disputes arising among a carrier's employees over representation and to certify the duly authorized representative of such employees. The Board has exclusive jurisdiction over representation questions under the RLA. *General Comm. of Adjustment v. M.K.T. R.R. Co.*, 320 U.S. 323 (1943); *Switchmen's Union of N. Am. v. Nat'l Mediation Bd.*, 320 U.S. 297 (1943). In *Air Line Pilots Ass'n, Int'l v. Texas Int'l Airlines, Inc.*, 656 F.2d 16, 22 (2d Cir. 1981), the court stated, "[t]he NMB is empowered to . . . decide representation disputes arising out of corporate restructurings."

III.

Single Transportation System

The Board's Representation Manual (Manual) Section 19.4 provides that: "Any organization or individual may file an application, supported by evidence of representation or a showing of interest . . . seeking a NMB determination that a single transportation system exists." Manual Section 19.501 provides the factors for making a determination whether a single system of transportation exists.

In *Trans World Airlines/Ozark Airlines*, the Board cited the following indicia of a single transportation system:

[W]hether a combined schedule is published; how the carrier advertises its services; whether reservation systems are combined; whether tickets are issued on one carrier's stock; if signs, logos and other publicly visible indicia have been changed to indicate only one carrier's existence; whether personnel with public contact were held out as employees of one carrier; and whether the process of repainting planes and other equipment, to eliminate indications of separate existence, has been progressed.

Other factors investigated by the Board seek to determine if the carriers have combined their operations from a managerial and labor relations

perspective. Here the Board investigates whether labor relations and personnel functions are handled by one carrier; whether there are a common management, common corporate officers and interlocking Boards of Directors; whether there is a combined workforce; and whether separate identities are maintained for corporate and other purposes.

14 NMB 218, 236 (1987).

The Board finds a single transportation system only when there is substantial integration of operations, financial control, and labor and personnel functions. *Republic Airlines, et al./Frontier*, 38 NMB 138 (2011); *Northwest Airlines, Inc./Delta Air Lines, Inc.*, 37 NMB 88 (2009); *Florida N. R.R.*, 34 NMB 142 (2007); *GoJet Airlines, LLC and Trans States Airlines, Inc.*, 33 NMB 24 (2005). Further, the Board has noted that a substantial degree of overlapping ownership, senior management, and Boards of Directors is critical to finding a single transportation system. *Precision Valley Aviation, Inc., d/b/a Precision Airlines and Valley Flying Serv., Inc., d/b/a Northeast Express Reg'l Airlines*, 20 NMB 619 (1993). The Board's substantial integration of operations criteria does not, however, require total integration of operations. *Allegheny Airlines, Inc. and Piedmont Airlines, Inc.*, 32 NMB 21, 28 (2004).

The Carriers rely heavily on the Board's determination in *NJI, Inc./NetJets Aviation*, 37 NMB 186 (2010) (*NetJets*) to support its argument that the Carriers are not operating as a single transportation system. The Board finds that the present case is distinguishable from *NetJets, above*. In *NetJets* much of the evidence presented dealt with the prospective integration of two carriers. In the present case, the Board is not considering evidence of how the Carriers may integrate in the future; the Board is considering evidence of how the Carriers have integrated. There is a single collective bargaining agreement covering the pilots at all of Pinnacle Corp.'s subsidiaries. There is a single seniority list allowing pilots "to bid for vacancies across the carriers." There is a single, centralized, senior level management team making decisions for the subsidiaries including: the disposition of assets; the cessation of operations of a subsidiary; the transfer of employees from one subsidiary to another; the consolidation of compensation and benefit plans across subsidiaries.

There are a number of prior Board determinations finding a single transportation system in the absence of a single FAA operating certificate. See, e.g., *Republic Airlines et al./Frontier*, 38 NMB 138 (2011). In *Atlas Air, Inc. and*

Polar Air Cargo Worldwide, Inc., 35 NMB 259, 269 (2008), the Board found a single transportation system even though the Carriers had separate operating certificates and separate crews. In *Atlas*, the Carriers did not combine their routes or schedules; and the Carriers' equipment did not have conformed markings, uniform insignia, or logos. *Id.* at 267. *See also Continental Airlines/Continental Express*, 20 NMB 326 (1993) (Board found a single system as a result of common control, common ownership, shared common officers, centralized management and labor relations; in spite of the fact the carriers had separate FAA operating certificates); *Midway Airlines, Inc.*, 14 NMB 447 (1987) (two carriers which existed as separate corporate entities and operated under separate FAA operating certificates were nevertheless, based on their combined operations, found to be a single transportation system).

The degree of "common control" exercised by a parent company over its subsidiaries is an important factor in single system determinations. In *Flagship Airlines, Inc.*, 22 NMB 331 (1995), a case with facts very similar to those present here, the Board found a single transportation system to exist primarily because of the significant degree of "common control" exercised by Eagle over its subsidiaries. *Id.* at 426. Eagle wholly-owned and centrally controlled the four subsidiaries; there existed interlocking boards of directors, common corporate officers, and common management; the carriers held themselves out to the public as a single carrier, and flight schedules and reservations were integrated; and while most employee groups were represented by separate organizations/CBAs, Eagle handled most other labor relations issues for the carriers. *Id.* at 426-30. *See also Republic Airlines et al*, 39 NMB 3 (2011) (single transportation system found where management and Boards are overlapping and the holding company has total operational control over its subsidiaries' operations); *USAir, Inc. and Shuttle, Inc. d/b/a USAir Shuttle*, 19 NMB 388 (1992) (single transportation system found where USAir did not own Shuttle but had a five year contract which gave extensive operational control over carriers management, labor relations, and marketing. There was no common Board or officers, but Shuttle's officers consulted with USAir on all management decisions. Flight crews were not integrated).

The Carriers emphasize that each subsidiary has separate department heads and managers responsible for each carrier's operations. However, ultimately each department is controlled by Pinnacle Corp.'s senior management team and Pinnacle Corp. holds itself out publically as managing both subsidiaries' operations. For example, Pinnacle Corp. determined that Mesaba's jet aircraft would be transferred to Pinnacle, Mesaba's personnel affected by the transfer would be given positions with Pinnacle, and Mesaba would cease operations. Each carrier may have its own department heads and

separate management structure beneath each department head; however, the Board's single carrier determination is not focused on the management structure beneath the department head it is focused on the management structure above the department head. In this case, it is a single fully integrated management structure – Pinnacle Corp.'s management structure. The managers of labor relations at Colgan and Pinnacle and the manager of labor relations for the pilot group all report to Pinnacle Corp.'s Vice President of Labor Relations. In addition, there is a single collective bargaining agreement covering the Pilots at all of the subsidiaries and Pilots can bid on positions at any of the subsidiaries.

The Board finds that Pinnacle Corp. exercises sufficient common control over its subsidiaries, Pinnacle, Colgan and the former Mesaba, to form a single transportation system for representation purposes. Following the multi-step transaction that integrated Pinnacle, Colgan and Mesaba, the Carriers all operate with individual operating certificates. However, other factors support a single system finding. The subsidiaries have common compensation and benefits. There is a single CBA in place covering the Pilots at all three subsidiaries. The Carriers are held out the public as subsidiaries of Pinnacle Corp. with a single management team and Board of Directors that has ultimate control over its subsidiaries' operations.

Based upon the application of the principles cited above to the facts established by the investigation, the Board finds that the Carriers are operating as a single transportation system, the Pinnacle system (Pinnacle, Colgan and the former Mesaba) for the craft or class of Flight Attendants.

CONCLUSION

The Board finds that Pinnacle and Colgan are operating as a single transportation system for the craft or class of Flight Attendants for representation purposes under the RLA. The former Mesaba Flight Attendants are included in the single transportation system.

Accordingly, the AFA-CWA's application in File No. CR-7017 is converted to NMB Case No. R-7324. The investigation will proceed to address the representation of this craft or class. Any Intervenor has 14 calendar days from the date of this determination to file an application supported by a requisite showing of interest. The participants are reminded that under Manual Section 19.7, existing certifications remain in effect until the Board issues a new certification or dismissal.

By direction of the NATIONAL MEDIATION BOARD.

A handwritten signature in cursive script that reads "Mary L. Johnson".

Mary L. Johnson
General Counsel

Copies to:
W. Chris Harrison
Douglas W. Hall
Edward Gilmartin
Deirdre Hamilton
Terry J. French
Carol Landry
David R. Jury
Edgar James