

MARIA CANTWELL, WASHINGTON, CHAIR
TED CRUZ, TEXAS, RANKING MEMBER

AMY KLOBUCHAR, MINNESOTA
BRIAN SCHATZ, HAWAII
EDWARD J. MARKEY, MASSACHUSETTS
GARY C. PETERS, MICHIGAN
TAMMY BALDWIN, WISCONSIN
TAMMY DUCKWORTH, ILLINOIS
JON TESTER, MONTANA
KYRSTEN SINEMA, ARIZONA
JACKY ROSEN, NEVADA
BEN RAY LUJÁN, NEW MEXICO
JOHN W. HICKENLOOPER, COLORADO
RAPHAEL G. WARNOCK, GEORGIA
PETER WELCH, VERMONT

JOHN THUNE, SOUTH DAKOTA
ROGER F. WICKER, MISSISSIPPI
DEB FISCHER, NEBRASKA
JERRY MORAN, KANSAS
DAN SULLIVAN, ALASKA
MARSHA BLACKBURN, TENNESSEE
TODD YOUNG, INDIANA
TED BUDD, NORTH CAROLINA
ERIC SCHMITT, MISSOURI
J.D. VANCE, OHIO
SHELLEY MOORE CAPITO, WEST VIRGINIA
CYNTHIA M. LUMMIS, WYOMING

United States Senate

COMMITTEE ON COMMERCE, SCIENCE,
AND TRANSPORTATION

WASHINGTON, DC 20510-6125

WEBSITE: <https://commerce.senate.gov>

LILA HARPER HELMS, MAJORITY STAFF DIRECTOR
BRAD GRANTZ, REPUBLICAN STAFF DIRECTOR

December 19, 2023

Mr. John E. Potter
President and Chief Executive Officer
Metropolitan Washington Airports Authority
Two Potomac Yard
2733 Crystal Drive
Arlington, VA 22202

Dear Mr. Potter:

I am deeply concerned that you and members of the board of the Metropolitan Washington Airports Authority (MWAA) have politicized MWAA and encouraged its corporate capture, ignoring MWAA's limited statutory mandate and abusing the power MWAA has been given by Congress. In particular, documents obtained by my Committee staff show that MWAA is attempting to extort millions of dollars in fees from airlines that might obtain new flights at Ronald Reagan Washington National Airport (DCA) should Congress change existing slot and perimeter rules—and effectively transfer such proceeds to United Airlines. As the Ranking Member of the Senate Committee on Commerce, Science, and Transportation, which oversees MWAA, I write to request information to allow the Committee to evaluate MWAA's administration of DCA and Washington Dulles International Airport (IAD).

As you are aware, Congress is considering updating two decades-old federal directives known as the “perimeter rule” and the “slot rule,” both of which impose significant restrictions on the types and number of flights DCA can offer. Congress has previously updated the perimeter and slot rules on several occasions, improving consumer choice *without* degrading existing service.¹ Even with these arbitrary restrictions, DCA remains the most popular airport in the Washington, D.C. area.² If Congress changes these rules to allow more flights into and out of DCA, it will create more competition, which is good for consumers across the country and in the D.C. region, but it is bad for United Airlines. Unsurprisingly, United Airlines is against Congress updating the rules since it will weaken the company's monopolistic hold on certain routes.³ United Airlines created a group—the “Coalition to Protect America's Regional Airports” (CPARA)—to lobby

¹ DCA Reagan National – Slot & Perimeter Rules, MWAA (last visited Dec. 13, 2023), <https://www.flyreagan.com/about-airport/aircraft-noise-information/dca-reagan-national-slot-perimeter-rules>.

² Dulles International Airport Proposes New 14-Gate Concourse, MWAA (Apr. 7, 2023), <https://www.flydulles.com/news/dulles-international-airport-proposes-new-14-gate-concourse>; Edward Russell, *United to Invest at Least \$34M at Washington Dulles*, FLIGHT GLOBAL (Dec. 10, 2018), <https://www.flightglobal.com/strategy/united-to-invest-at-least-34m-at-washington-dulles/130611.article>.

³ See Valerie Yurk, *United Airlines Leads Air Lobbying as FAA Bill Stalls*, ROLL CALL (Nov. 1, 2023), <https://rollcall.com/2023/11/01/united-airlines-leads-air-lobbying-as-faa-bill-stalls/>.

against any changes.⁴ This coalition includes MWAA, as well as airports that fly to neither DCA nor IAD, raising questions as to the tactics United Airlines may have deployed to secure those memberships.⁵

MWAA's participation in this group and its lobbying campaign to limit flights at DCA is concerning because, unlike other airport operators, MWAA is not a private entity: it is a public corporation that is accountable to Congress, which Congress empowered to "acquire, maintain, improve, operate, protect, and promote" *both* IAD and DCA "*for public purposes.*"⁶ Instead of serving this mandate, however, MWAA appears more interested in serving the financial fortunes of the Chicago-based United Airlines, having openly campaigned against the interests of DCA and the flying public. MWAA board members have even jumped further into the partisan fray, proposing to deny flights to the nation's capital based on political litmus tests.⁷

While many, including myself, disagree with United Airlines' position, as a private company, it may lobby Congress and the public to support its business objectives. The same is not true for MWAA, a government creation that is statutorily obliged to promote IAD's *and* DCA's interests. MWAA is not United Airlines' corporate lobbyist, nor should it be.

Nevertheless, MWAA has become the face of United Airlines' lobbying campaign against DCA. In May of this year, MWAA helped launch United Airlines' pro-rules lobbying group, CPARA.⁸ As you and David Mould, MWAA's Vice President of Communications, told MWAA board members in May, MWAA is also "engag[ing] the appropriate [f]ederal authorities," "reach[ing] out to the Pilot's Association and/or others who need to weigh in," and "working with its [c]ongressional delegation, its major airlines, the business community, and others to make the case for keeping the rule[s] intact."⁹ MWAA's website even links to a form on United Airlines' lobbying group's website for constituents to email their Members of Congress "opposing any changes" to the slot and perimeter rules.¹⁰ At a recent MWAA board committee meeting, one board member openly stressed the "importance of . . . continu[ing] to support United Airlines."¹¹ But Congress did not create MWAA to serve as an agent for one company or anti-competitive practices that raise ticket prices for travelers.

⁴ See Press Release: Community and Industry Leaders Launch Coalition to Protect America's Regional Airports, The Coalition to Protect America's Regional Airports (May 31, 2023), <https://www.protectregionalairports.com/2023/06/01/community-and-industry-leaders-launch-coalition-to-protect-americas-regional-airports/>; PROTECT AMERICA'S REGIONAL AIRPORTS: ABOUT THE COALITION (last visited Nov. 21, 2023), <https://www.protectregionalairports.com/>

⁵ See *id.*

⁶ 49 U.S.C. § 49106 (emphasis added).

⁷ See p. 3, *infra*.

⁸ Press Release: Community and Industry Leaders Launch Coalition to Protect America's Regional Airports, *supra* note 4.

⁹ *Summary Minutes of Committee Meeting, Strategic Development Committee*, MWAA (May 17, 2023) (on file with Committee).

¹⁰ Protecting the DCA Perimeter, MWAA (last visited Dec. 13, 2023), <https://www.mwaa.com/protecting-dca-perimeter>.

¹¹ See *Summary Minutes of Committee Meeting, Strategic Development Committee*, *supra* note 9.

Worse yet, it appears that United Airlines and MWAA are conspiring to undermine a possible congressional change to the rules even before they have been signed into law. My office has received nonpublic documents confirming that, at United Airlines' request, MWAA is insisting that soon-to-be renewed lease agreements with the airlines include provisions forcing airlines to pay \$1 million annually for each additional DCA flight in the event Congress does change the rules.¹² Moreover, MWAA will direct any penalties collected under this provision to IAD—meaning MWAA would be taxing patrons who fly to DCA to help enrich IAD's most important tenant: United Airlines.

MWAA's efforts to tax flyers, extort airlines, and usurp congressional authority are shocking enough. But the board has also contemplated creating political litmus tests for which states may or may not get flights to and from DCA. At a May meeting of the MWAA board's Strategic Development Committee, one member, J. Walter Tejada, asserted that states should "approve certain unrelated social justice initiatives in their local states or districts prior to being considered for flights into and out of Reagan National."¹³ Mr. Tejada proposed that a state might satisfy this condition if its public schools and businesses "approve a diversity, equity, and inclusion initiative, or that they also prove that books are not banned from schools."¹⁴

MWAA claims it opposes any changes to the status quo because "the D.C. region is well served by IAD, which has no flight restrictions."¹⁵ But to quote the namesake of DCA, the other airport you are charged with serving, "status quo—that's Latin for 'the mess we're in.'"¹⁶ Residents of the D.C. region who are forced to fly through IAD are hardly "well served" paying monopolistic prices, especially when they would prefer to fly through DCA if the arbitrary slots and perimeter controls did not exist.

The Standing Rules of the Senate provide the Committee on Commerce, Science, and Transportation the authority to "review and study" transportation and MWAA "on a continuing basis."¹⁷ So that the Committee can review MWAA's effectiveness in administering DCA and IAD and whether and how MWAA's board members may be further politicizing the authority, please provide the documents requested below and written responses to the questions below no later than January 4, 2024 and in accordance with the attached instructions, noting the preservation instructions in particular as well as that the production and preservation instructions apply to all documents within the custody or control of MWAA, any of its directors (copied

¹² Draft Term Sheet for MWAA Airport Use Agreement and Premises Lease (Dec. 4, 2023) (on file with Committee with additional supporting documents).

¹³ See *Summary Minutes of Committee Meeting, Strategic Development Committee*, *supra* note 9.

¹⁴ *Id.*

¹⁵ MWAA, Preserve Reagan National Airport Slot and Perimeter Rule, <https://www.protectregionalairports.com/wp-content/uploads/2023/05/Perimeter-Rule-2023-FINAL-1.pdf>.

¹⁶ President Ronald Reagan, *Remarks at the Annual Convention and Centennial Observance of the United Brotherhood of Carpenters and Joiners* (Sept. 3, 1981).

¹⁷ S. Rules XXV(1)(f), XXVI(8)(a)(2).

here), or any of its employees, regardless of whether the document or communication is on an MWAA email or record system.

1. All communications between CPARA, or its members, including others acting on CPARA's or one of its member's behalf, and MWAA, including members of its board, from January 1, 2023, to present. If any relevant oral communications or meetings took place between CPARA and MWAA, including members of its board, from January 1, 2023, to present, identify the dates on which those meetings or oral communications took place and the subject of those meetings or communications.
2. All documents and communications referring or relating to possible changes to the slot or perimeter rules, including communications between United Airlines and MWAA, including members of its board, from January 1, 2023, to present. If any relevant oral communications or meetings took place between United Airlines and MWAA, including members of its board, from January 1, 2023, to present, identify the dates on which those meetings or oral communications took place and the subject of those meetings or communications.
3. A detailed account of, or documents sufficient to show, MWAA's involvement with CPARA, including:
 - a. When MWAA first learned of efforts related to CPARA and who told MWAA about those efforts;
 - b. A list of third parties, including representatives of CPARA and other private entities, involved in MWAA's decision to join CPARA;
 - c. The amount of money MWAA has spent on CPARA-related efforts; and
 - d. All third-party outreach MWAA has made related to CPARA.
4. MWAA has completed ethics reviews, which assess potential and apparent conflicts of interest under the MWAA board code of ethics, for the members of MWAA's board who are subject to Senate confirmation. Please complete an ethics review for *all* members of the MWAA board and provide those assessments.
5. How many capital expenditure projects has MWAA approved since January 1, 2013, at DCA and IAD, respectively? Provide a list of those projects, identifying where each took place, when each began and was completed, and how much each project cost.
6. Will MWAA commit that from January 1, 2024 onward, it will not include in any contract, including lease agreements, any provision that imposes any additional, unique costs on an airline that chooses to apply for a new DCA slot authorized by Congress?
7. Do you agree that you and all board members have a fiduciary duty to travelers at both IAD and DCA? If so, do you agree that fiduciary duty revolves around providing travelers aviation services and does not include "social justice," Environmental, Social Governance (ESG) issues, or any other political issue?

8. Will MWAA commit that it will never condition slots at DCA or IAD on any issue unrelated to aviation, including “social justice,” ESG, or any other political issue?
9. Did MWAA conduct, fund, or otherwise support any reports, analyses, or studies related to the slot and perimeter rules? If so, identify and provide them.
10. Did MWAA consider any reports or studies concerning economic impact assessments or employment projections in reviewing possible changes to the slot and perimeter rules? If so, provide them (including those that it considered and rejected).

Sincerely,



Ted Cruz
Ranking Member

cc: William E. Sudow, Chairman of MWAA Board of Directors
Thorn Pozen, Vice-Chairman of MWAA Board of Directors
Judith N. Batty, Member of MWAA Board of Directors
John A. Braun, Member of MWAA Board of Directors
Sean Burton, Member of MWAA Board of Directors
Taylor Chess, Member of MWAA Board of Directors
Albert J. Dvoskin, Member of MWAA Board of Directors
Brett Gibson, Member of MWAA Board of Directors
Michele Hagans, Member of MWAA Board of Directors
Katherine K. Hanley, Member of MWAA Board of Directors
Mamie W. Mallory, Member of MWAA Board of Directors
Timothy Poole, Member of MWAA Board of Directors
J. Walter Tejada, Member of MWAA Board of Directors
Mark Uncapher, Member of MWAA Board of Directors
Joslyn N. Williams, Member of MWAA Board of Directors

Instructions for Responding to a Committee Request

Committee on Commerce, Science, & Transportation
United States Senate
118th Congress

A. Responding to a Request for Documents

1. In complying with the Committee's request, produce all responsive documents that are in your possession, custody, or control, whether held by you or your past or present agents, employees, and representatives acting on your behalf. You should also produce documents that you have a legal right to obtain, that you have a right to copy or to which you have access, as well as documents that you have placed in the temporary possession, custody, or control of any third party. This request extends to any personal devices utilized for official business. Requested records, documents, data, or information should not be destroyed, modified, removed, transferred, or otherwise made inaccessible to the Committee.
2. To ensure the integrity of the Committee's investigation, preserve all documents, communications, and other data whether physical documents or electronically stored information ("ESI") that can reasonably be anticipated to be subject to a request for production by the Committee in this investigation, regardless of production pursuant to paragraph (1). "Documents, communications, and other data" should be construed broadly. For the purposes of this request, "preserve" means taking reasonable steps to prevent the partial or full destruction, alteration, testing, deletion, shredding, incineration, wiping, relocation, migration, theft, or mutation of ESI, as well as negligent or intentional handling that would make such records, communications, or data incomplete or inaccessible. Further, we request that you:
 - a. Exercise reasonable efforts to identify and notify former employees and contractors, subcontractors, and consultants who may have access to such documents, communications, and other data that it is to be preserved;
 - b. Exercise reasonable efforts to identify, recover, and preserve any documents, communications, and other data which has been deleted, partially destroyed, or marked for deletion or destruction but is still recoverable; and
 - c. If it is the routine practice of any employee or contractor to destroy or otherwise alter such documents, communications, and other data, either halt such practices or arrange for the preservation of complete and accurate duplicates or copies of such documents, communications, and other data, suitable for production, if requested.
3. In the event that any entity, organization, or person denoted in the request has been or is also known by any other name or alias than herein denoted, the request should be read also to include the alternative identification.
4. Documents should be produced in electronic form, *i.e.*, email, cloud-based production (such as the Committee's Large File Transfer Service or other Senate-approved mechanism) memory stick, or thumb drive, in lieu of paper productions.

Instructions for Responding to a Committee Request

5. Documents produced in electronic form should be organized, identified, and indexed electronically.
6. Electronic document productions should be prepared according to the following standards:
 - a. The production should consist of single page Tagged Image Files (“.tif”), files accompanied by a Concordance-format load file, an Opticon reference file, and a file defining the fields and character lengths of the load file.
 - b. Document numbers in the load file should match document Bates numbers and .tif file names.
 - c. If the production is completed through a series of multiple partial productions, field names and file order in all load files should match.
 - d. All electronic documents produced should include the following fields of metadata specific to each document: BEGDOC, ENDDOC, TEXT PATH, BEGATTACH, ENDATTACH, PAGECOUNT, CUSTODIAN, RECORDTYPE, DATE, TIME, SENTDATE, SENTTIME, BEGINDATE, BEGINTIME, ENDDATE, ENDTIME, AUTHOR, FROM, CC, TO, BCC, SUBJECT, TITLE, FILENAME, FILEEXT, FILESIZE, DATECREATED, TIMECREATED, DATELASTMOD, TIMELASTMOD, INTMSGID, INTMSGHEADER, NATIVELINK, INTFILPATH, EXCEPTION.
 - e. Alternatively, if the production cannot be made in .tif format, all documents derived from word processing programs, email applications, instant message logs, spreadsheets, and wherever else practicable should be produced as in their native format. In such circumstances, consult with Committee staff prior to production of the requested documents.
 - f. If any of the requested information is only reasonably available in machine-readable form (such as on a computer server, hard drive, or computer backup tape), consult with the Committee staff to determine the appropriate format in which to produce the information.
7. Documents produced to the Committee should include an index describing the contents of the production. To the extent more than one tranche of files is produced, each tranche should contain an index describing its contents.
8. Documents produced in response to the request should be produced together with copies of file labels, dividers or identifying markers with which they were associated when the request was served.
9. When producing documents, identify the paragraph in the Committee’s schedule to which the documents respond.

Instructions for Responding to a Committee Request

10. Do not refuse to produce documents on the basis that any other person or entity also possesses non-identical or identical copies of the same documents or on the basis that although the documents are in your custody or control they did not originate with you or are not owned by you.
11. This request is continuing in nature and applies to any newly discovered information. Any record, document, compilation of data or information not produced because it has not been located or discovered by the return date, should be produced immediately upon subsequent location or discovery.
12. All documents should be Bates-stamped sequentially and produced sequentially. Each page should bear a unique Bates number.
13. If compliance with the request cannot be made in full by the date specified in the request, compliance should be made to the extent possible by that date. Notify Committee staff as soon as possible if full compliance cannot be made by the date specified in the request, and provide an explanation for why full compliance is not possible by that date.
14. In the event that any document is withheld on the basis of privilege, provide a privilege log containing the following information concerning any such document: (a) the privilege asserted; (b) the type of document; (c) the general subject matter; (d) the date, author, and addressee; and (e) the relationship of the author and addressee to each other.
15. In the event that a portion of a document is redacted on the basis of privilege, provide a privilege log containing the following information concerning any such redaction: (a) the privilege asserted; (b) the location of the redaction in the document; (c) the general subject matter of the redacted material; (d) the date, author, and addressee of the document, if not readily apparent; and (e) the relationship of the author and addressee to each other.
16. If any document responsive to this request was, but no longer is, in your possession, custody, or control, identify the document (stating its date, author, subject and recipients) and explain the circumstances under which the document ceased to be in your possession, custody, or control.
17. If a date, name, title, or other descriptive detail set forth in this request referring to a document is inaccurate, but the actual date, name, title, or other descriptive detail is known to you or is otherwise apparent from the context of the request, produce all documents which would be responsive as if the date, name, title, or other descriptive detail was correct.
18. In the event a complete response requires the production of classified information, provide all as much information in unclassified form as possible in your response and send all classified information under separate cover via the Office of Senate Security.
19. Unless otherwise specified, the period covered by this request is from January 1, 2013 to the present.

Instructions for Responding to a Committee Request

20. Upon completion of the document production, you should submit a written certification, signed by you or your counsel, stating that: (1) a diligent search has been completed of all documents in your possession, custody, or control which reasonably could contain responsive documents; and (2) all documents located during the search that are responsive have been produced to the Committee.

B. Responding to Interrogatories or a Request for Information

1. In complying with the Committee's request, answer truthfully and completely. Persons that knowingly provide false testimony could be subject to criminal prosecution for perjury (when under oath) or for making false statements. Persons that knowingly withhold subpoenaed information could be subject to proceedings for contempt of Congress. If you are unable to answer an interrogatory or information request fully, provide as much information as possible and explain why your answer is incomplete.
2. In the event that any entity, organization, or person denoted in the request has been or is also known by any other name or alias than herein denoted, the request should also be read to include the alternative identification.
3. Your response to the Committee's interrogatories or information requests should be made in writing and should be signed by you, your counsel, or a duly authorized designee.
4. When responding to interrogatories or information requests, respond to each paragraph in the Committee's schedule separately. Clearly identify the paragraph in the Committee's schedule to which the information responds.
5. Where knowledge, information, or facts are requested, the request encompasses knowledge, information or facts in your possession, custody, or control, or in the possession, custody, or control of your staff, agents, employees, representatives, and any other person who has possession, custody, or control of your proprietary knowledge, information, or facts.
6. Do not refuse to provide knowledge, information, or facts on the basis that any other person or entity also possesses the same knowledge, information, or facts or on the basis that although the documents are in your custody or control they did not originate with you or are not owned by you.
7. The request is continuing in nature and applies to any newly discovered knowledge, information, or facts. Any knowledge, information, or facts not provided because it was not known by the return date, should be provided immediately upon subsequent discovery.
8. If compliance with the request cannot be made in full by the date specified in the request, compliance should be made to the extent possible by that date. Notify Committee staff as soon as possible if full compliance cannot be made by the date

Instructions for Responding to a Committee Request

specified in the request, and provide an explanation for why full compliance is not possible by that date.

9. In the event that knowledge, information, or facts are withheld on the basis of privilege, provide a privilege log containing the following information: (a) the privilege asserted; (b) the general subject matter of the knowledge, information, or facts withheld; (c) the source of the knowledge, information, or facts withheld; (d) the paragraph in the Committee's request to which the knowledge, information, or facts are responsive; and (e) each individual to whom the knowledge, information, or facts have been disclosed.
10. If a date, name, title, or other descriptive detail set forth in this request is inaccurate, but the actual date, name, title, or other descriptive detail is known to you or is otherwise apparent from the context of the request, provide the information that would be responsive as if the date, name, title, or other descriptive detail was correct.
11. In the event a complete response requires the transmission of classified information, provide as much information in unclassified form as possible in your response directly to the Committee offices and send only the classified information under separate cover via the Office of Senate Security.
12. Unless otherwise specified, the period covered by this request is from January 1, 2013 to the present.

C. Definitions

1. The term "document" in the request or the instructions means any written, recorded, or graphic matter of any nature whatsoever, regardless of how recorded, and whether original or copy, including, but not limited to, the following: memoranda, reports, expense reports, books, manuals, instructions, financial reports, working papers, records, notes, letters, notices, confirmations, telegrams, receipts, appraisals, pamphlets, magazines, newspapers, prospectuses, inter-office and intra-office communications, electronic mail (e-mail), contracts, cables, notations of any type of conversation, telephone call, meeting or other communication, bulletins, printed matter, computer printouts, teletypes, invoices, transcripts, diaries, analyses, returns, summaries, minutes, bills, accounts, estimates, projections, comparisons, messages, correspondence, press releases, circulars, financial statements, reviews, opinions, offers, studies and investigations, questionnaires and surveys, and work sheets (and all drafts, preliminary versions, alterations, modifications, revisions, changes, and amendments of any of the foregoing, as well as any attachments or appendices thereto), and graphic or oral records or representations of any kind (including without limitation, photographs, charts, graphs, microfiche, microfilm, videotape, recordings and motion pictures), and electronic, mechanical, and electric records or representations of any kind (including, without limitation, tapes, cassettes, disks, and recordings) and other written, printed, typed, or other graphic or recorded matter of any kind or nature, however produced or reproduced, and whether preserved in writing, film, tape, disk, videotape, or otherwise. A document bearing any notation not a part of the original text is to be considered a separate document. A draft or non-identical copy is a separate document within the meaning of this term.

Instructions for Responding to a Committee Request

2. The term “communication” in the request or the instructions means each manner or means of disclosure or exchange of information, regardless of means utilized, whether oral, electronic, by document or otherwise, and whether face to face, in meetings, by telephone, mail, telex, facsimile, email (desktop or mobile device), computer, text message, instant message, iMessage, MMS, RCS, or SMS message, WhatsApp, Signal, any other encrypted message, regular mail, discussions, releases, delivery, or otherwise. This includes communications on encrypted phones and personal devices and personal accounts utilized for official business.
3. The terms “and” and “or” in the request or the instructions should be construed broadly and either conjunctively or disjunctively to bring within the scope of this request any information which might otherwise be construed to be outside its scope. The singular includes plural number, and vice versa. The masculine includes the feminine and neuter genders.
4. The terms “person” or “persons” in the request or the instructions mean natural persons, firms, partnerships, associations, corporations, subsidiaries, divisions, departments, joint ventures, proprietorships, syndicates, or other legal, businesses or government entities, and all subsidiaries, affiliates, divisions, departments, branches, or other units thereof.
5. The term “identify” in the request or the instructions, when used in a question about individuals, means to provide the following information: (a) the individual’s complete name and title; and (b) the individual’s business address, email address, and phone number.
6. The terms “referring” or “relating” in the request or the instructions, when used separately or collectively, with respect to any given subject, mean anything that constitutes, contains, embodies, reflects, identifies, states, refers to, deals with or is pertinent to that subject in any manner whatsoever.
7. The term “employee” in the request or the instructions means agent, borrowed employee, casual employee, consultant, contractor, de facto employee, independent contractor, joint venturer, loaned employee, part-time employee, permanent employee, provisional employee, or subcontractor.
8. The terms “you” and “your” in the request or the instructions refer to yourself; your firm, corporation, partnership, association, department, or other legal or government entity, including all subsidiaries, divisions, branches, or other units thereof; and all members, officers, employees, agents, contractors, and all other individuals acting or purporting to act on your behalf, including all present and former members, officers, employees, agents, contractors, and all other individuals exercising or purporting to exercise discretion, make policy, and/or decisions.

#