

August 16, 2026

Patrick Ford
Executive Director
San Francisco Ethics Commission
25 Van Ness Avenue, Suite 220
San Francisco, CA 94102

Re: Request for a Limited Waiver of the One-Year Post-Employment Communication Restriction under San Francisco Campaign and Governmental Conduct Code Section 3.234(a)(2)

Dear Ethics Commission,

I write to request a narrow, position-specific waiver of the one-year post-employment restriction on communications with my former department, established by San Francisco Campaign and Governmental Conduct Code Section 3.234(a)(2). I am, until August 28, 2026, the Director of the Airport Integrated Operations Center ("AIOC") for San Francisco International Airport ("SFO" or the "Airport"), a department of the City and County of San Francisco. Effective August 31, 2026, I am joining United Airlines ("United") as Managing Director of the Station Operations Center ("SOC") at SFO.

This request follows a letter of advice I received from Commission staff dated August 12, 2026, which confirmed that only the one-year restriction on communicating with my former department is implicated by my new position. I am grateful for the letter's guidance on the option of seeking a waiver from the Commission, and consistent with it, I am submitting this written request.

As required by Ethics Commission Regulation 3.234-4(a)(1), I certify that I have provided a copy of this waiver request to Eva Cheong, Acting Chief Operating Officer, who is responsible for the day-to-day management of the Airport Integrated Operations Center.

Work History

I have spent nearly three decades in commercial aviation operations, with over 15 years at SFO.

I spent more than 22 years with United Airlines across several airports and departments, including station operations, ramp operations, vendor management, and United Express contract management at United's World Headquarters. I spent 15 of those years at United's SFO station operations, where I held every role from customer service through Shift Manager, later serving as United's Inflight Base Director at SFO.

I subsequently joined the City and County of San Francisco, as SFO's Director of the Airport Integrated Operations Center. In that role, I built and launched the AIOC as SFO's centralized, 24/7 operations hub, and I was responsible for AIOC strategy, policy, and day-to-day oversight of operational conditions, mitigations, and issues across the Airport. I reported to the Airport's Chief Operating Officer.

The New Position and the Need for a Waiver

As Managing Director of United's Station Operations Center at SFO, I will lead a team of more than 150 employees responsible for United's operational performance at the station, including flight scheduling, coordination with United's Network Operations Center, and station safety and security. **A core function of this role, confirmed in United's own job description for the position, is to serve as United's primary liaison to Federal and City agencies, which will include daily coordination with the AIOC on aircraft and passenger movement and, when needed, emergency or incident management.**

This coordination function is not unique to me or to United. Every major carrier operating at SFO maintains an operational point of contact responsible for communicating routinely with the AIOC to support the Daily Operations Plan, responding to irregular operations, and coordinating on safety and emergency matters. The AIOC itself was built to serve as this kind of common operating picture for the entire airline community, not for any single carrier. Therefore, the need for United's SOC Managing Director to communicate with the AIOC is structural to how SFO operates today and exists independent of who holds that position.

As confirmed in the Commission staff's advice letter, these anticipated communications are administrative in nature and will include daily operational coordination, performance and KPI reporting, and safety or emergency response coordination. These communications will not involve the awarding of contracts, leases, or similar agreements between United and the Airport.

Scope of Waiver Requested

I request a limited waiver permitting me to communicate with AIOC and other Airport personnel solely regarding routine, day-to-day operational coordination and safety or emergency incident management, the ordinary functions of the SOC Managing Director role as described above. I am not requesting, nor do I not need, any waiver to communicate regarding contracts, leases, procurement, gate or facility allocations, rates and charges, or other matters in which United has a direct financial or competitive interest before the Airport. Those matters may remain subject to the full one-year restriction under Section 3.234(a)(2), and I will route any such matters to other United personnel who are not subject to the restriction.

No Undue Influence or Unfair Advantage

Under Section 3.234(c)(1), the Commission may grant this waiver if it determines that doing so would not create the potential for undue influence or unfair advantage. I believe the facts here support that finding.

The nature and scope of the communications. I seek a waiver only for communications that are operational and administrative in nature, such as coordinating aircraft and passenger movement, sharing information for the Daily Operations Plan, and participating in safety and emergency response coordination. These are not communications intended to influence discretionary City decisions, such as contract awards, lease terms, or procurement outcomes.

Subject matter. The subject matter mirrors exactly what any airline's station operations leadership must discuss with the AIOC as a matter of course, and what I discussed with counterparts at other carriers when I served in the AIOC role. Nothing about the subject matter of these communications is exclusive to my prior City position.

My former position and inside knowledge. While I held significant knowledge of AIOC's internal processes as its director, that operational knowledge has been shared with the airline community as a matter of transparency. It is not confidential nor competitively sensitive information that would advantage United over other carriers. The AIOC's stated purpose is to give the entire airline community a shared, common operating picture. Though I may be familiar with how that picture was built, my operational knowledge of the AIOC will not translate into an unfair advantage in matters of contracting, leasing, or resource allocation matters, which fall outside the scope of the waiver I am requesting.

Other relevant factors. As United stated in its job description for the position, United's SOC Managing Director has been required to coordinate daily with the AIOC per the operational realities of a joint-use international airport. It did not arise from, nor is it contingent on, my prior City employment. Further, the AIOC and United's SOC both operate under close FAA and TSA regulatory oversight, which further constrains the discretion either side has in day-to-day coordination. Granting this waiver would simply allow me to perform the same liaison function that my predecessor performed and which counterparts at other airlines already perform.

Timing

I understand the earliest the Commission could consider this request is at its regularly scheduled meeting on September 11, 2026. Because my new position begins August 31, 2026, I will limit my communication with the Airport in the interim. Until the Commission has acted on this request, any such communications will be limited to routine requests for publicly available information and matters that are solely ministerial or clerical as those are permitted without a waiver. I would welcome the opportunity to attend the September 11 meeting to answer any questions, and I am available to Commission staff before then as well.

Thank you for your consideration.

Sincerely,

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Managing Director, Station Operations Center, United Airlines (effective August 31, 2026)

Former Director, Airport Integrated Operations Center, San Francisco International Airport