

Executive AI Maturity at Major U.S. Airports: A Market Intelligence Study and DEN Benchmark

Prepared from independent public sources. Tone: neutral, credibility-focused. Current as of June 2026. Built cold; no internal DEN work product used.

TL;DR

- **Denver International Airport (DEN) is on pace with its peer group on operational/technology AI, but appears behind the most visible leaders (DFW, MIA, ATL) in publicly documented *executive and governance* AI maturity** — a gap that is about visibility and formalization, not necessarily internal capability, and it is fixable inside 90 days.
 - Across the top 15 U.S. airports, almost no airport has a published *airport-specific* AI governance policy or a named airport-level "AI owner." Most rely on parent city/county AI policies (Denver, Seattle, San Francisco, Phoenix, Atlanta, Chicago), and most visible "AI" activity is vendor-led operational technology rather than governed executive capability.
 - DEN already holds three credible foundations peers would envy — founding membership in the Airports AI Alliance, coverage under a mature City of Denver generative-AI policy with a city Chief AI Officer, and a co-branded executive-education pipeline (CU Denver Aviation EMBA) — but has not publicly converted these into a named owner, documented airport governance, leadership use cases, or measurable outcomes.
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PART 1 — THREE-PAGE EXECUTIVE BRIEF

1. Headline finding

On the evidence visible in public sources, **DEN is on pace operationally but trails the most visible peer leaders in *executive/governance* AI maturity.** The shortfall is concentrated in visible artifacts — a named airport AI owner, an aviation-specific governance layer, documented executive use cases, executive training, and published outcomes. DEN is not behind in raw engagement: it is one of only a handful of U.S. airports in the Airports AI Alliance and is covered by an unusually developed city AI policy. The most accurate framing is "**behind in public evidence and formalization, not demonstrably behind in capability.**"

2. Executive summary (every factual claim cited)

- **The ranking that frames this study is current and official.** Per Airports Council

International (ACI) 2024 data, ATL was the world's busiest airport (108.1M total passengers); DEN served 82,358,744 passengers in 2024 (up 5.8% over 2023), ranking "the third busiest airport in North America for the fourth year in a row and the sixth busiest airport in the world" (DEN release citing ACI, April 14, 2025). DFW was ~87.8M (Grade A).

- **DEN is a founding member of the Airports AI Alliance** — "formed of eight founder member airports, including Dallas Fort Worth, Atlanta Hartsfield-Jackson, Denver International and Toronto Pearson International," with industry members Zensors AI, NVIDIA and AWS, launched at the Airport Leadership Forum in Miami on May 29, 2024 (Cities Today; Grade D, corroborated by PRNewswire Grade C). This is a strong, citable signal of executive-level AI intent. (Cities Today)
- **DEN is covered by a mature parent-city AI policy and a city Chief AI Officer.** The City and County of Denver's "Generative AI Transparency, Use, and Accountability Policy" (POL0020153, effective Jan. 1, 2024) governs all city agencies including the Department of Aviation (Grade A). Mayor Mike Johnston named Suma Nallapati Denver's first Chief AI and Information Officer (effective Sept. 29, 2025), who stated "AI is no longer just a tool — it's a core capability for a more responsive, resilient, and resident-focused government" (StateScoop/Colorado Politics; Grade A/B). (amazonaws)
- **DFW is the clearest peer leader on executive AI ownership.** It has a named owner (Paul Puopolo, EVP Innovation / Chief Technology & Innovation Officer), a stated internal generative-AI governance policy, board-level AI briefings, and concrete internal GenAI use cases (Grade B).
- **DEN's visible AI footprint is real but skews operational and vendor-led** — BigBear.ai's veriScan biometric boarding and a one-week Liberty Defense Hexwave employee-screening pilot — with no publicly documented airport-specific AI governance, named airport AI owner, AI-specific CIO statements, or DEN-published outcome metrics (Grade A absence / C vendor / E inference).
- **DEN's CEO speaks about AI mainly in operational terms.** CEO Phillip Washington's public AI comments center on predictive maintenance and asset management, not generative AI or executive workflows (Grade B).
- **DEN has a rare executive-development asset:** the world's-first CU Denver Executive MBA in Aviation, co-branded with DEN, launched June 9, 2025 with its first cohort in January 2026 — though AI is not a headlined module (Grade A).

3. The benchmark (DEN vs. peers; two scores)

Airport (Authority)	Op/Tech AI (1-5)	Exec/Gov AI (1-5)	Short evidence note	Grade
DFW (DFW Int'l Airport Board)	4	4	Named owner Puopolo; internal GenAI governance policy; board AI briefing; internal GenAI use cases	B
ATL (City of Atlanta Dept. of Aviation)	4	3	Databricks/Azure data+GenAI program, ~80% time-to-insight gain; city AI Commission + CIO + GA state CAIO	C/D + A
MIA (Miami-Dade Aviation Dept.)	4	3	CIO Jenkins (ACI 2023 Best Innovation Leader); first GenAI doc-search system to production; county AI guidance	B/C + A
DEN (City & County of Denver Dept. of Aviation)	3-4	2-3	AI Alliance founding member; city GenAI policy + city CAIO; veriScan/Hexwave operational AI (vendor-led); no airport-specific owner/policy found	D + A + C + E
SEA (Port of Seattle)	3-4	3	PlaneInsight ML/CV (FutureEdge award); strong City of Seattle AI policy/plan (governs City, not Port); 2024 ransomware exposed gaps	C/D + A
LAX (Los Angeles World Airports)	3	3	CDTO Ian Law public AI remarks; CIO Aura Moore; SF/CA city AI context	B/D + A
JFK / EWR (Port Authority NY & NJ)	3	2-3	CTO Rob Galvin; AI traffic/curbside pilots, \$100M "Operation Legal Ride"; largely operational	A/D
PHX (City of Phoenix Aviation Dept.)	3	3	Assistant CIO Jamie Ritchie joined AI Alliance; strong City of Phoenix GenAI Code of Conduct	D + A
ORD (Chicago Dept. of Aviation)	3	2	ORDNext resource-management systems; City of Chicago GenAI roadmap; little executive AI signal	D + A
LAS (Clark County Dept. of Aviation)	3	2	CITO Rishma Khimji GenAI interest; AI security-screening + wait-time systems	B/C/D

Airport (Authority)	Op/Tech AI (1-5)	Exec/Gov AI (1-5)	Short evidence note	Grade
CLT, MCO, IAH	2-3	2	Mostly operational/vendor activity in public record; limited executive AI evidence found	D/E

Scores are evidence-of-visibility judgments, not audits of internal capability. Absence of public evidence is reported as such, not inflated.

4. Where DEN appears strong (each cited)

- **Peer-network positioning.** Founding airport member of the Airports AI Alliance alongside DFW, ATL, MIA and Toronto — a C-suite-level forum on AI governance, strategy and procurement (Cities Today; Grade D).
- **Parent-city governance and a city CAIO.** Coverage under Denver's POL0020153 generative-AI policy (effective Jan. 1, 2024) and a city Chief AI and Information Officer (Grade A).
- **Operational AI in production.** veriScan biometric boarding "deployed at 14 international departure gates at DEN, impacting the boarding process for over 46,600 international departing passengers" across 13 airlines (BigBear.ai, Oct. 28, 2024 — *vendor* claim, see caveats; Grade C).
- **Executive-development pipeline.** Co-branded CU Denver Executive MBA in Aviation (launched June 9, 2025; first cohort January 2026), classes held at DEN (Grade A).
- **Stated strategic interest in AI for asset reliability.** CEO Washington frames AI around predictive maintenance: "We want to know when an asset is going to break down, not chase after it once it has" (International Airport Review; Grade B). International Airport Review

5. Where DEN appears behind or less visible (surgical, not punitive)

Distinguish two categories:

- **Behind in public evidence (most items):** No named *airport-level* AI owner found; no aviation-specific DEN AI governance layer (it relies on the citywide policy); no documented executive/leadership GenAI use cases; no AI-specific public statements from airport technology leadership; no DEN-published outcome metrics. Vision 100 / Operation 2045 do not name AI as an explicit pillar (Grade A absence / E inference).
- **Possibly behind in capability, but unproven:** Whether internal DEN AI pilots, training, or governance exist but are non-public. This is genuinely unknown from public sources.

This contrasts with DFW, which publicly pairs a named owner, an internal governance policy, board briefings, and internal GenAI use cases (Grade B), and with MIA, which has moved a

generative-AI tool into production in a back-office executive function (Grade B/C).

6. Top 5 recommendations (ranked)

1. **Name an accountable airport-level AI owner** (most likely the SVP Business Technologies/CIO or a designated deputy) with a written mandate. *Peer evidence:* DFW (Puopolo), MIA (Jenkins). High impact, high urgency, high feasibility, high risk-reduction.
2. **Adopt a thin DEN-specific governance layer that inherits the city policy** (POL0020153) and adds aviation-specific items: vendor AI disclosure in procurement, model-risk review, public-records handling, and human-in-the-loop for any decision affecting passengers or employees. *Peer evidence:* Seattle/Phoenix frameworks; DFW internal policy.
3. **Inventory current AI use** (operational and back-office) to separate governed capability from shadow AI and vendor pilots. *Peer evidence:* Atlanta AI Commission's recommended centralized AI inventory.
4. **Run a structured executive/manager AI literacy program**, leveraging the CU Denver Aviation EMBA partnership and the AI Alliance. *Peer evidence:* AAAE Executive Certificate in Applied AI for Airports; Atlanta's training emphasis.
5. **Pilot governed generative AI in 1-2 executive workflows** — board-memo/briefing drafting, capital-planning scenario support, or crisis-communications drafting — with disclosure, human review, and a published outcome metric. *Peer evidence:* MIA's document-search tool; DFW's internal Q&A use case.

Do NOT yet: launch large public-facing or high-risk AI pilots before owner, inventory, and governance exist; treat vendor metrics as DEN outcomes; or brand any of this "AI transformation" without measured results.

7. 90-day action path

- **Days 0–30:** Name the AI owner; stand up a cross-functional working group (Legal, IT/cyber, Finance, Comms, HR); begin the AI use inventory; confirm coverage under the city policy and identify aviation-specific gaps.
 - **Days 31–60:** Publish the DEN AI governance addendum (procurement disclosure, model-risk review, human-in-the-loop, public records); deliver a first executive AI literacy session; select 1–2 internal GenAI pilots with explicit success metrics.
 - **Days 61–90:** Run pilots in a sandbox with human review; capture baseline-vs-after metrics; brief CEO/board on inventory findings, governance status, and pilot results; set thresholds (e.g., measurable time savings, zero data-handling incidents) that justify scaling.
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PART 2 — EVIDENCE APPENDIX / MARKET INTELLIGENCE DOSSIER

A. Methodology

- **Sourcing:** Independent public sources only — official airport/authority/city sites and policy/board documents (Grade A); named-executive interviews, conference remarks, and LinkedIn posts (Grade B); vendor case studies/announcements (Grade C); trade and news media (Grade D); reasoned inference, labeled (Grade E).
- **Search strategy:** Started with the authoritative passenger ranking (ACI/FAA), then mapped (1) airport-level executive/IT/innovation leadership, (2) parent-city/county AI governance, (3) Airports AI Alliance membership, and (4) named GenAI use cases and outcomes. Primary documents were fetched directly where available (e.g., Denver POL0020153). A targeted secondary research pass focused specifically on DEN's airport-level governance, executive statements, procurement, outcomes, and strategic-plan language.
- **Scoring:** Two independent 1-5 scores per airport (Operational/Technology AI; Executive/Governance AI) on the task's maturity scale. Scores reflect *publicly visible evidence*; lack of public evidence is reported as a visibility finding, never inflated to imply absence of capability.
- **Vendor-claim rule:** Vendor claims are flagged and not treated as airport-verified unless confirmed by an official airport/authority/government source or a named airport executive.
- **Limitations:** See Devil's Advocate. The biggest single limitation is that city-department airports inherit city policy, so a "no airport policy" finding often means the policy lives one governance level up.

B. Top 15 airport scan (2024 ACI ranking basis)

Airport	Governing authority	Why included	Op/Tech AI evidence	Exec/Gov AI evidence	Named AI owner / closest equiv.	AI policy found?	Trair evid
ATL	City of Atlanta Dept. of Aviation	#1 US	Databricks/Azure + Power BI data+GenAI program	City AI Commission; GA state CAIO/GTA governance	IT Dir. Innovation R&D Jon Pruitt (airport); city CIO Jason Sankey	City/state (A)	City trair Atla Con urge trair
DFW	DFW Int'l Airport	#2 US	Biometrics, predictive	Internal GenAI	Paul Puopolo, EVP	Internal (B)	Innc func

Airport	Governing authority	Why included	Op/Tech AI evidence	Exec/Gov AI evidence	Named AI owner / closest equiv.	AI policy found?	Traffic evidence
	Board (bi-city)		maintenance, queue mgmt	governance policy; board briefings	Innovation/CTIO		incl.
DEN	City & County of Denver Dept. of Aviation	#3 US; focus	veriScan biometrics; Hexwave pilot; predictive-maintenance ambition	City GenAI policy + city CAIO; AI Alliance founder	None at airport level found; CIO/SVP Juan Lucero is de facto tech lead	City (A); none airport-specific	CUI Avia EMI AI-s
ORD	Chicago Dept. of Aviation	#4 US	ORDNext SkyCore AODB/Allegra RMS; counter-drone	City of Chicago GenAI roadmap	City-level	City (A)	Not
LAX	Los Angeles World Airports	#5 US	Biometrics; passenger systems	CDTO Ian Law AI remarks; CIO Aura Moore	Ian Law (CDTO)	City/CA context (A)	Not airp
JFK	Port Authority NY & NJ	top US intl	AI curbside/traffic pilots (NYU C2SMART); "Operation Legal Ride" \$100M	CTO Rob Galvin statements	Rob Galvin (CTO, PANYNJ)	Not found (airport)	Not
LAS	Clark County Dept. of Aviation	top 10	AI security screening (SeeTrue); AI wait-time display	CITO Rishma Khimji GenAI interest	Rishma Khimji (CITO)	Not found	Not
MCO	Greater Orlando Aviation Authority	top 10	Operational/vendor activity	Limited public executive signal	Not found in this pass	Not found	Not

Airport	Governing authority	Why included	Op/Tech AI evidence	Exec/Gov AI evidence	Named AI owner / closest equiv.	AI policy found?	Traffic evidence
CLT	City of Charlotte Aviation Dept.	top 10	Operational/CX tech	Limited public executive signal	City-level	Not found	Not
MIA	Miami-Dade Aviation Dept.	top 10 intl	Biometrics; turnaround analytics	First GenAI doc-search to production; county AI guidance	Maurice Jenkins (CIO/Chief Innovation Officer)	County (A)	Innovative cultural chal
SEA	Port of Seattle	top 10	PlaneInsight ML/CV; Assaia turn mgmt	City of Seattle AI policy/plan (City, not Port)	CIO Matt Breed	City (A); Port unclear	City prog
PHX	City of Phoenix Aviation Dept.	top 12	Electrochromic AI glass; accessibility AI	City of Phoenix GenAI Code of Conduct	Asst. CIO Jamie Ritchie (AI Alliance)	City (A)	Not airp
SFO	City & County of SF Airport Comm.	top 12	Operational/CX tech	SF citywide GenAI guidelines	City-level	City (A)	City train Adv Ctte
IAH	Houston Airport System	top 15	Operational/vendor activity	Limited public executive signal	City-level	Not found (airport)	Not
EWR	Port Authority NY & NJ	top 15	AV shuttle tests; AI infrastructure inspection (Blyncsy)	CTO Rob Galvin	Rob Galvin (CTO, PANYNJ)	Not found (airport)	Not

C. Deep profiles (6 airports)

C1. Denver International Airport (DEN) — *the subject*

1. **Overview.** Owned/operated by the City and County of Denver Department of Aviation; CEO Phillip A. Washington. 3rd busiest in the U.S. / 6th globally; 82,358,744 passengers in 2024 (+5.8%) per DEN's ACI-based release (April 14, 2025). Selected as the study's focus airport.
2. **Named executive AI owner.** *No named airport-level AI owner found in public sources.* The de facto senior technology executive is Juan Lucero, SVP Business Technologies & CIO (a 2026 National ORBIE Awards finalist, public sector). The city-level owner is Chief AI and Information Officer Suma Nallapati.
3. **Public AI policy/governance.** No DEN airport-specific AI policy found. DEN is covered by the City and County of Denver "Generative AI Transparency, Use, and Accountability Policy" (POL0020153, effective Jan. 1, 2024), which requires testing for biased outcomes, prohibits inputting confidential/regulated data into public GenAI, requires documentation and explainability, and mandates a Technology Services Vendor Risk Assessment before procuring GenAI (Grade A). (amazonaws)
4. **AI by executive function.** *Operations/asset management:* predictive-maintenance ambition (CEO quote, Grade B). *IT/security:* BigBear.ai veriScan biometric boarding (vendor, Grade C); Liberty Defense Hexwave employee-screening pilot (one week, Grade D). *Legal/finance/HR/comms/strategy:* no public GenAI use cases found.
5. **Training/workforce enablement.** CU Denver Executive MBA in Aviation, co-branded with DEN (launched June 9, 2025; first cohort Jan. 2026), is a leadership-development asset, though AI is not a headlined module (Grade A). No DEN-internal AI training program found publicly.
6. **Executive statements.** CEO Washington: "We want to know when an asset is going to break down, not chase after it once it has. By combining conditional assessments with AI, we can create a predictive environment that keeps our infrastructure reliable" (International Airport Review; Grade B). *Note:* generative-AI quotes in DEN-adjacent coverage came from Oscar Munoz (former United CEO), not DEN — do not attribute to DEN. (International Airport Review)
7. **Measurable outcomes.** *None DEN-published.* veriScan's "46,600 international departing passengers / 13 airlines / 14 gates" is a BigBear.ai vendor figure (Grade C). On Hexwave, DEN explicitly said it had "no data to share" (Grade A/D).
8. **Gaps, risks, unverifiable claims.** No airport AI owner, no aviation-specific governance, no executive GenAI use cases, no DEN outcome metrics, no AI-specific CIO statements; Vision 100 / Operation 2045 do not name AI as a pillar (AI appears chiefly in an intern-produced "Aviation Megatrends" research report). Liberty Defense's Oct. 28, 2025 announcement of

Hexwave at "one of the largest international airports in the United States" does not name DEN and is unconfirmed. (Stock Titan)

9. **Lessons for DEN.** Copy DFW's named-owner + internal-policy + board-briefing model and MIA's "GenAI in a back-office executive function" pattern; avoid equating vendor biometrics with executive AI maturity.

C2. Dallas Fort Worth (DFW) — *executive-AI benchmark*

1. **Overview.** Governed by the DFW International Airport Board (owned by Dallas and Fort Worth); ~87.8M passengers 2024 (3rd globally). Selected for strongest executive-AI evidence.
2. **Named owner.** Paul Puopolo, EVP Innovation, Enterprise Data & Analytics / Chief Technology & Innovation Officer (Grade A/B).
3. **Policy/governance.** Stated internal generative-AI governance policy "to educate everyone internally about what generative AI is, its capabilities, and its permissible uses" (Puopolo, InnoLead Feb. 2024; Grade B). (InnoLead)
4. **AI by function.** *Finance/procurement:* GenAI to "sort through contracts," "answer specific business questions against our own data sources," parking yield/aviation-services models; *operations:* predictive central-utility-plant models; biometrics, queue management, predictive maintenance (Grade B). Board briefing: "AI is now becoming less of an innovation and more of an operational necessity" (Fort Worth Report, March 2026; Grade B/D). (InnoLead)
5. **Training.** Innovation function explicitly includes "training, tool kit, and tech talks" (Grade B/D).
6. **Statements.** As above; Puopolo is also President of the Cities Today Institute's Airport Leadership Forum (Grade B/D).
7. **Outcomes.** Internal use cases described; no specific public metric.
8. **Gaps/risks.** Public detail on measured ROI and governance documentation is limited; some claims are interview-sourced (Grade B).
9. **Lessons for DEN.** The clearest replicable model: named owner + internal GenAI policy + board visibility + internal (not just passenger-facing) use cases.

C3. Miami (MIA)

1. **Overview.** Miami-Dade Aviation Department; top-10 US and major international gateway.
2. **Named owner.** Maurice Jenkins, Chief Innovation Officer (ACI World/Amadeus 2023 Best Airport Innovation Leader, June 27, 2023; Grade A/D). (Miami-Dade County)
3. **Policy.** Miami-Dade County AI guidance (Grade A); no airport-specific policy cited.
4. **AI by function.** *Legal/environmental/compliance:* MDAD moving an environmental "AI document search and chat" capability from proof-of-concept to production on Microsoft

Azure — described as "MDAD's first generative AI system" (International Airport Review; Grade B/C). *Customer experience*: chatbot/hologram roadmap (Grade B/D).

5. **Training.** "Building a culture of innovation... our executives are backing it" (Jenkins; Grade B).
6. **Statements.** Jenkins is notably pragmatic on AI: "Everyone's chasing the panacea... we've seen real promise in AI for revenue optimization and customer experience" (Grade B).
7. **Outcomes.** Not quantified publicly.
8. **Gaps/risks.** Some roadmap items "still under wraps"; outcomes unquantified.
9. **Lessons for DEN.** Apply GenAI to a concrete back-office executive function (document/records management) with a named owner.

C4. Atlanta (ATL)

1. **Overview.** City of Atlanta Department of Aviation; world's busiest (108.1M, 2024).
2. **Named owner.** Airport IT Director of Innovation R&D Jon Pruitt (data/AI program); city CIO Jason Sankey; Georgia state Chief Digital & AI Officer (Grade A/C/D).
3. **Policy/governance.** City of Atlanta AI Commission (launched 2024; final report 2026 recommending a permanent AI advisory board co-chaired by the CIO, a centralized AI inventory, and AI training); Georgia Technology Authority AI governance and CAIO model (Grade A).
4. **AI by function.** *Operations/finance/admin*: Databricks/Azure + Power BI platform spanning "12 different datasets and 57 data sources," expanding to finance, technology, commercial, administration (Grade C/D).
5. **Training.** Commission urged "AI training and a citywide change management program"; partnerships (Georgia Tech, Google.org) (Grade A/D).
6. **Statements.** Executive sponsorship after the dashboard proof-of-concept (Grade D).
7. **Outcomes.** "80% improvement in time to insight, from 30 minutes to 5 minutes" for the operations GM (CIO.com; vendor/trade, Grade C/D). (CIO)
8. **Gaps/risks.** Governance is city/state, not airport-specific; the headline metric is vendor/trade-sourced.
9. **Lessons for DEN.** A strong data spine plus a city/state governance umbrella can substitute for an airport-only policy — but a named airport owner still matters.

C5. Seattle-Tacoma (SEA) / Port of Seattle

1. **Overview.** Port of Seattle (a port authority, not a city department); top-10 US.
2. **Named owner.** CIO Matt Breed; senior systems architect Skip Tavakkolian (Grade C/D).
3. **Policy.** Strong City of Seattle AI policy and 2025-2026 AI Plan — but these govern the *City of Seattle*, not the Port; the Port's own AI governance posture is less clear publicly (Grade A + E).

4. **AI by function.** *Operations/cargo*: PlaneInsight ML/computer-vision for air-cargo (FutureEdge 50 award); Assaia turn-management video analytics (Grade C/D).
5. **Training.** Not found at Port level.
6. **Statements.** "Machine learning will fundamentally change the way the port operates" (senior systems architect; Grade C/D).
7. **Outcomes.** Cargo efficiency gains (qualitative); award recognition (Grade C/D).
8. **Gaps/risks.** The August 2024 Rhysida ransomware attack that disrupted SEA underscores that operational/AI ambition must be matched by governance and cyber resilience (Grade D).
9. **Lessons for DEN.** Don't assume the parent-government AI policy fully covers an enterprise airport/port — confirm coverage and add aviation-specific governance and cyber review.

C6. JFK / EWR — Port Authority of NY & NJ

1. **Overview.** Bi-state Port Authority operating JFK, EWR, LGA; top US international gateways.
2. **Named owner.** CTO Rob Galvin; Innovation Hub program director Seth Wainer (Grade A/D).
3. **Policy.** No airport-specific AI policy cited; activity framed as innovation/technology programs.
4. **AI by function.** *Operations/landside*: NYU C2SMART AI curbside/queue-detection pilots (JFK), GridMatrix crossings pilot, Blyncsy AI infrastructure inspection; *security/policing*: \$100M "Operation Legal Ride" using AI against illegal taxi hustling (Grade A/D).
5. **Training.** Not found.
6. **Statements.** Galvin: "the agency has been at the forefront of technology... this collaboration... reflects our goals to operate at the highest standards possible" (Grade A/D).
7. **Outcomes.** Blyncsy pilot: PANYNJ projected ~25% first-year and up to 48% five-year survey-cost savings (vendor, Grade C); C2SMART pilot ~90% car detection (academic, Grade D).
8. **Gaps/risks.** Heavy operational AI, comparatively little public *executive-governance* signal.
9. **Lessons for DEN.** Operational breadth ≠ governed executive AI; pair pilots with governance and named ownership.

D. Cross-airport pattern analysis

- **Named airport-level AI ownership is rare.** Clear at DFW (Puopolo) and MIA (Jenkins). Most others default to a CIO/CDTO (LAX's Law, SEA's Breed, LAS's Khimji, PANYNJ's Galvin, PHX's Ritchie) or to a parent-city CAIO (Denver's Nallapati).

- **Published AI principles/governance live mostly at the city/county/state level** (Denver, Seattle, San Francisco, Phoenix, Atlanta, Chicago, Georgia), not the airport. Independent authorities (DFW, GTAA) are likelier to set their own — DFW is the standout with an internal GenAI policy.
- **Executive training is thin everywhere;** the strongest signals are external (AAAE Executive Certificate in Applied AI for Airports; the Airports AI Alliance; CU Denver's Aviation EMBA). Atlanta's commission explicitly recommended internal training.
- **Measurable outcomes are scarce and mostly vendor-supplied** (ATL time-to-insight; veriScan throughput; Blynscy cost savings). Few airports publish their own validated metrics.
- **Where vendor claims outpace airport-verified evidence:** biometric throughput figures, "agentic," and "world's first/AI-powered" framings recur; the veriScan and Liberty Defense claims around DEN are vendor-sourced and partly unconfirmed.
- **Operationally strong but governance-light:** JFK/EWR (Port Authority) and ORD.
- **Building executive AI capacity (most visibly):** DFW, MIA, ATL; the Airports AI Alliance cohort (DFW, ATL, DEN, MIA, GTAA) is the clearest collective signal.

E. DEN gap analysis (required framing)

- **Ahead / strong in:** peer-network positioning (AI Alliance founding airport); access to a mature city AI policy and a city CAIO; a co-branded executive-education pipeline; credible operational AI (biometrics; predictive-maintenance ambition).
- **On pace in:** operational/technology AI deployment relative to peers; reliance on city-level governance (same posture as ATL, PHX, ORD, SFO, and SEA's Port-vs-City situation).
- **Behind or less visible in:** a named airport-level AI owner; an aviation-specific governance layer; documented executive/leadership AI use cases; published outcome metrics; AI-specific statements from airport technology leadership.
- **Unknown due to limited public evidence:** internal DEN AI pilots, internal training, and any non-public governance.

F. Recommendations table

#	Recommendation	Rationale	Peer evidence	Impact	Urgency	Feasibility	Risk-reduct
1	Name an airport-level AI owner	Accountability gap is the single biggest visible deficit	DFW (Puopolo), MIA (Jenkins)	5	5	5	5

#	Recommendation	Rationale	Peer evidence	Impact	Urgency	Feasibility	Risk-reduct
2	Aviation-specific governance addendum on the city policy	City policy doesn't cover airport procurement/records nuances	Denver POL0020153; DFW internal policy; Seattle/Phoenix	5	4	4	5
3	AI use inventory	Separates governed use from shadow AI/vendor pilots	Atlanta AI Commission	4	4	4	4
4	Executive AI literacy program	Leaders must supervise AI competently	AAAE certificate; AI Alliance; CU Denver EMBA	4	3	4	4
5	Govern a GenAI pilot in an executive workflow	Demonstrates value with controls + a metric	MIA doc-search; DFW internal Q&A	4	3	4	4

G. What not to overclaim

- **veriScan throughput** ("46,600 passengers / 13 airlines / 14 gates") is a BigBear.ai *vendor* figure; not independently confirmed by DEN.
- **Hexwave** at DEN was a one-week *pilot* with "no data to share" per DEN; Liberty Defense's later "one of the largest international airports" award does not name DEN and is unconfirmed.
- **Zensors** airport queue/wait-time outcomes are documented at Harry Reid (LAS), not DEN; do not attribute to DEN despite shared Alliance membership.
- **ATL's "80% time-to-insight"** is a vendor/trade metric, not an airport-audited figure.
- **Any "AI transformation" framing** for any airport here would overstate the evidence; most activity is early-stage or operational.
- **"No public evidence" is not "no capability"** — especially for DEN, where Alliance membership and city-CAIO coverage suggest real engagement.

H. Source bibliography (grouped; with grades)

Ranking / context

- ACI-NA, "2024 North American Airport Traffic Rankings" (airportscouncil.org) — A.
- DEN release citing ACI, "third busiest in North America... sixth busiest in the world," 82,358,744 passengers 2024 (flydenver.com, Apr 14 2025) — A.
- FAA CY2024 enplanements (faa.gov) — A.

DEN

- City & County of Denver, "Generative AI Transparency, Use, and Accountability Policy" POL0020153 (eff. Jan 1 2024) — A.
- DEN Executive Leadership / Vision 100 (flydenver.com) — A.
- DEN "Aviation Megatrends Report 2024" (DENterns) (flydenver.com) — D (intern research).
- StateScoop / Cities Today, Denver CIO→CAIO (Suma Nallapati), Sept 2025 — A/B.
- BigBear.ai veriScan at DEN, Oct 28 2024 — C (vendor).
- Denver7 / Axios, Hexwave employee-screening pilot, Oct-Nov 2023 — D, with DEN statement A.
- Connected Aviation Today; International Airport Review — Washington AI quotes — B.
- CU Denver Business School; CPR; FLYING — Aviation EMBA — A/D.

Airports AI Alliance

- Cities Today, "AI airport alliance announces founder members" — D.
- PRNewswire, "Leading industry players... alliance," May 29 2024 — C.
- Cities Today Institute, 2026 Summit pages (DFW, MIA, ATL, DEN, GTAA) — D.

DFW

- InnoLead, Puopolo interview (Feb 2024) — B.
- Fort Worth Report, board AI briefing (Mar 2026) — B/D.
- World Aviation Festival; Terrapinn speaker bio — B/D.

ATL

- CIO.com, "Data transformation... Hartsfield-Jackson" — C/D.
- GovTech / Smart Cities Dive / FOX5 / Atlanta City Council — AI Commission — A/D.
- Georgia Technology Authority / ai.georgia.gov — A.

MIA

- International Airport Review, environmental AI doc-search — B/C.
- Miami-Dade County / news.miami-airport.com — ACI 2023 award — A.
- World Aviation Festival; Aviation Pros — Jenkins remarks — B/D.

SEA / Port of Seattle

- City of Seattle GenAI Policy + 2025-2026 AI Plan (seattle.gov) — A.
- CIO.com, PlaneInsight — C/D.
- Assaia case study — C.
- Tech Times, post-ransomware analysis — D.

LAX

- LAWA executive bios (Ian Law, Aura Moore, John Ackerman) — A.
- LAWA LinkedIn / SXSW 2024 (Law AI remarks) — B/D.

PANYNJ (JFK/EWR)

- NYU Tandon C2SMART pilot — D.
- NJBIZ (Galvin quote, GridMatrix) — A/D.
- Blynco case study — C.
- Gothamist ("Operation Legal Ride") — D.

PHX

- City of Phoenix GenAI Code of Conduct (phoenix.gov) — A.
- HSToday, Jamie Ritchie joins AI Alliance — D.

ORD / Chicago; LAS; SF

- City of Chicago Roadmap for AI (chicago.gov) — A; FTE/Travel&Tour (ORDNext) — D.
- SupplyChain Strategy / Interface (Khimji); SeeTrue (LAS screening) — B/C/D.
- SF.gov Generative AI Guidelines (2023; July 2025) — A.

Frameworks / training

- AAAE Executive Certificate in Applied AI for Airports (aaae.org) — A/D.
- NIST AI RMF; IBM/PwC CAIO explainers — D (context).

Devil's Advocate: What This Research Cannot Prove

- **Public sources understate internal activity.** DEN and peers may have internal AI pilots, training, or governance not visible online; "behind in public evidence" ≠ "behind in capability."
- **Vendor announcements may exaggerate maturity.** Biometric throughput, "agentic," and "world's first/AI-powered" claims are frequently vendor- or media-sourced and were not independently confirmed by airports.
- **Operational AI ≠ executive AI maturity.** Heavy biometrics/computer-vision (Port Authority, ORD, SEA) does not prove governed, board-level executive AI.
- **Governance structures vary, limiting comparison.** City-department airports (DEN, ATL, PHX, ORD, SFO) inherit city AI policy; independent authorities (DFW, GTAA) set their own — so "no airport policy" can simply mean the policy lives one level up.
- **DEN may be more advanced than it looks.** Its Alliance membership, city-CAIO coverage, and EMBA partnership signal genuine engagement; the gap is primarily visibility and aviation-specific formalization.
- **Peer "leaders" may have ungoverned pilots.** Some impressive peer pilots may lack the governance, training, or scalability to be durable, which the scores cannot fully capture.

Final recommendation frame

DEN has several genuinely strong foundations, but public evidence suggests it is **less visible than leading peers (DFW, MIA, ATL) in executive AI ownership, documented leadership use cases, airport-specific governance, and executive training.** That gap is fixable and inexpensive.

- **What DEN should do first:** name an airport-level AI owner, inventory current AI use, and add a thin aviation-specific governance layer atop the existing City of Denver policy.
- **What DEN should not do yet:** launch large or public-facing pilots before owner, inventory, and governance exist; or treat vendor metrics as DEN outcomes.
- **Which peers to watch most closely:** DFW (named ownership + internal governance), MIA (GenAI in an executive/back-office function), ATL (city/state governance + data spine).
- **Which claims require further verification:** all vendor throughput/"first" figures (veriScan, Hexwave, Zensors), and whether any DEN internal AI governance or training already exists but is non-public.
- **What evidence DEN should gather internally before deciding:** a complete inventory of AI tools/pilots in use; current contract language on vendor AI disclosure and data handling; any existing internal AI guidance; and baseline metrics for the executive workflows it

intends to pilot (e.g., time spent drafting board memos, capital-planning scenarios, or crisis communications).