

**WRITTEN STATEMENT OF
AIR LINE PILOTS ASSOCIATION, INTERNATIONAL (ALPA)
BEFORE THE
SUBCOMMITTEE ON AVIATION
OF THE
COMMITTEE ON TRANSPORTATION AND INFRASTRUCTURE
U.S. HOUSE OF REPRESENTATIVES**

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“A Work in Progress: Implementation of the FAA Reauthorization Act of 2018”

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Mr. Chairman and members of the Subcommittee, thank you for the opportunity to testify on the Federal Aviation Administration's (FAA's) implementation of the requirements of the FAA Reauthorization Act of 2018. The Air Line Pilots Association, International (ALPA), represents more than 63,000 professional airline pilots flying for 35 airlines in the United States and Canada. ALPA is the world's largest pilot union. We are the recognized voice of the airline piloting profession in North America, with a history of safety and security advocacy spanning more than 85 years. As the sole U.S. member of the International Federation of Air Line Pilots' Associations (IFALPA), ALPA has the unique ability to provide airline pilot expertise to aviation safety and security issues worldwide, and to incorporate an international dimension to safety and security advocacy.

As the first vice president and national safety coordinator for the world's largest non-governmental aviation safety organization, I can report that ALPA remains keenly focused on ensuring that the FAA implement these key legislative requirements as intended by Congress. It is our organization's top priority to stay focused on continual improvement and judicious oversight to ensure that air travel is as safe and secure as humanly possible.

By way of background, I am a former Navy fighter pilot and 23-year airline pilot. I currently fly for United Airlines. I can tell you that achieving the highest standards of safety and security has been a personal commitment throughout my career. I can also tell you that all airline pilots share my dedication to advancing aviation safety

and security, and that these principles have been the foundation of ALPA's work for more than 85 years.

While aviation accidents are increasingly rare, ALPA has advocated for and helped develop a forensic approach to accident investigation designed to identify every factor involved in an airline accident and develop corrective actions to address them, with the sole objective of preventing similar accidents from occurring in the future. In the U.S. airline industry, we now have a more risk-predictive model to collect data, evaluate it, identify mitigations, and implement them to make a safe system even safer.

Because of this commitment, ALPA is fully informed and involved in efforts to bring the Boeing 737 MAX safely back into service following the completion of the current FAA process. I have led our Air Safety Organization pilots and staff in collaborating with all appropriate regulatory authorities and stakeholders in the United States, Canada, and across the globe.

ALPA has offered our airline pilot perspective on the issues related to the accidents, including the process and procedures used to certify aircraft in the United States.

We have been in communication with Boeing, the FAA, the National Transportation Safety Board, and airlines, as well as with the U.S. Department of Transportation Special Committee and international bodies. We pledge to continue to be a resource for this Committee as well.

Overview

Based on current statistics, 14 Code of Federal Regulations (CFR) Part 121 airlines carry approximately 900 million passengers and 18 million tons of cargo annually. Notably, U.S. passenger airlines operated under 14 CFR Part 121 have had only one passenger fatality resulting from an accident since 2009. This safety record is not due to luck, but rather to the efforts of the aviation industry and our government partners, and it is due to the efforts of Congress and this Committee, in particular. During the 20 years prior to the passage of the Aviation Safety and Federal Aviation Administration Reauthorization Act of 2010, the U.S. passenger airline industry lost approximately 1,100 passengers in aircraft accidents. Since the passage of that bill, there has not been a single passenger fatality due to “pilot error.”

Strikingly, since 2009, there have been 93 fatal passenger airline accidents around the rest of world, which includes more than 4,700 fatalities. The U.S. passenger airline record is truly remarkable. For that reason, we believe that the most important work this Committee can accomplish is to continue to ensure the United States maintains the highest safety levels in the world and continues to lead by example in all areas of aviation, including aircraft certification, flight crew training and licensing, crew-duty and rest requirements, airport design standards, the safe introduction of new entrants, safety data analysis, and many others. This comprehensive safety mindset allows passengers to board a 14 CFR Part 121 passenger airline and know, with a very high degree of confidence, that they will get there safely. From day one in 1931, ALPA

has maintained our motto of “schedule with safety.” It hasn’t changed; *safety is still our top priority.*

This Committees’ continued focus on safety is to be commended, and we thank you for using your time and resources—including today—to shine a spotlight on safety. Unless we keep airline safety the top priority, we risk digression and an increase in accidents, which impact our ability to make progress on other important aspects of aviation such as investments in increasing airspace capacity and the introduction of new types of aviation and space operations into the national airspace system.

FAA Reauthorization Implementation

In October 5, 2018, the Federal Aviation Administration Reauthorization Act of 2018 became law (P.L. 115-254). The members of this Committee demonstrated significant leadership to ensure that the legislation ultimately became law, and you are to be commended for your efforts to advance aviation safety. This law, if implemented appropriately and as Congress intended, will improve the air transportation system for years to come.

Retention of Congressionally Mandated First Officer Qualifications

In 2018, Congress retained the current airline pilot training and qualification requirements that are the law of the land. ALPA was pleased with both this Committee and Congress for making this lifesaving and wise decision. The best and most important safety feature of any airline operation is at least two skilled, well trained,

fully qualified, highly experienced, and adequately rested professional flightcrew members. With a solid foundation of training and experience, pilots are essential in maintaining the safety of our system and ensuring that aviation safety continues to advance. Several regional airline accidents from 2004 to 2009 identified numerous training and qualification deficiencies that ultimately led to Congressional action and regulatory changes that significantly improved airline safety. The last of these accidents occurred February 12, 2009, near Buffalo, N.Y. Fifty lives were lost—49 in the aircraft and one on the ground. This accident was a watershed event for the airline industry and aviation safety, resulting in regulations that enhanced pilot training, qualification, flight experience requirements, and the implementation of science-based flight, duty, and rest requirements.

The pilot training and qualifications regulations specifically require that all airline pilots flying under 14 CFR Part 121 must hold the air transport pilot (ATP) or restricted ATP (R-ATP) certificate. The R-ATP certificate pathway can be obtained with fewer flight hours' experience than the ATP if the pilot applicant receives integrated academic and flight training from the military or an accredited aviation college or university.

Today's training, qualification, and flight experience regulations emphasize significantly greater focus on academics and instruction, areas of knowledge, and flight experience in various weather and operational situations. The rules also require a type rating in the aircraft to be flown for the airline if operated in 14 CFR Part 121

service and increased experience in multiengine aircraft, among other numerous safety improvements. The FAA made a specific mention of the importance of academic training when it published the final rule, and how the accredited academics along with ground and flight training was necessary to qualify for a reduction in hours. We applaud this Committee for its leadership in preserving the training and qualifications requirements last year and urge you to continue to do so. We are confident that lives have been and are being saved because of your steadfastness on this issue. The international aviation community, through the International Civil Aviation Organization (ICAO), would benefit greatly by adopting a similar philosophy, and we have asked ICAO to review current training, qualification, and flight experience standards.

Safety Regulations vs. Bad Airline Economics

Despite the clear message sent by Congress in 2018, there are some people and organizations who want to address business-related industry issues by reducing the requirements currently in place to obtain an ATP or an R-ATP. These changes would weaken the first officer qualification (FOQ) rules. They believe that rolling back provisions in P.L. 111-216 is the best way to fix their business challenges by widening the employment pool. We do not believe that those who are advocating for such measures are properly representing the issue of pilot availability, which is not pilot qualification requirements but an airline's attractiveness to the pilot community as an employer.

It is somewhat ironic that some who originally called for the changes in P.L. 111-216 have since become critical of the rules, arguing that the first officer qualifications have created a pilot shortage. Small communities which have experienced changes in the levels of airline services are also citing a pilot shortage. However, in both cases, there is no reliable data to support these positions and, in fact, the data says just the opposite.

In 2018, the FAA reported that it had issued 5,788 ATP certificates, which includes 1,762 R-ATP certificates. Our research revealed that the airlines hired approximately 4,600 pilots in 2018, which is considerably fewer than the number of pilots who became qualified to fly for the airlines that year. In fact, the number of ATP certificates issued by the FAA has been higher than the number of airline pilots hired for multiple years in a row. Clearly, the supply of pilots is currently keeping up with the demands. We realize that as the industry expands, more pilots will be needed. ALPA continues to promote the pilot profession far and wide, as a career of choice for men and women who enjoy all the benefits that the career has to offer.

Promoting the Profession and Increasing Diversity

ALPA continues to promote the airline pilot profession. This includes a team of ALPA pilots who promote the profession at several large aviation events including Women in Aviation; the Organization of Black Aerospace Professionals; AirVenture in Oshkosh, Wisconsin, and the National Gay Pilots Association. Hundreds of ALPA pilots also promote the profession to students of all ages in thousands of schools

nationwide. And for those college students who are in the midst of their flight training activities, we work alongside them to help prepare them for their future airline career. You can see some of our work at www.clearedtodream.org.

All of these activities to promote the profession have included a focused effort to diversify the pilot community. This includes our efforts to reduce barriers to entry for minorities and women. We believe that there is no shortage of individuals who have the motivation, skills, and aptitude to serve as pilots for a U.S. airline.

We were pleased to support provisions in the Aviation Safety and FAA Authorization Act of 2018 promoting women in aviation. We wholeheartedly applaud the leadership by this Committee to include that section, and we strongly support the establishment of a board that will be solely focused on women in aviation. We look forward to engaging on this topic with our fellow industry colleagues. It is our hope the FAA will move quickly to name participants to this body so it can begin its important work without delay.

Secondary Barriers Delayed

As we recently marked the 18th anniversary of the tragedy of 9/11, it is unfortunate that our airliners are still not adequately protected. Reinforced flight deck doors, mandated on passenger airliners by the U.S. Congress after the terrorist attacks of Sept. 11, 2001, do not provide a complete solution to the problem they were intended to resolve. There are times when operational necessity requires that the flight deck

door be opened in flight. That period, however slight, represents a vulnerability that must be addressed. An installed physical secondary barrier, accompanied by standardized crew procedures for protecting the flight deck when the reinforced door is opened in flight, will significantly augment the intended benefits of the fortified door and other TSA-approved onboard protective measures, and add an important layer of security to prevent hostile takeover of the flight deck.

At the behest of this Committee, Section 336 of P.L. 115-254 requires “not later than 1 year after the date of the enactment of this Act, the Administrator of the Federal Aviation Administration shall issue an order requiring installation of a secondary cockpit barrier on each new aircraft that is manufactured for delivery to a passenger air carrier in the United States operating under the provisions of part 121 of title 14, Code of Federal Regulations.”

However, with a deadline just a few weeks away, the FAA has inserted unnecessary roadblocks to stall progress on this important security provision. The FAA tasked the Aviation Rulemaking Advisory Committee (ARAC), over ALPA’s stated objections, forming a working group to establish recommendations to the agency on the implementation of the Section 336 directive.

Clearly, this is a move to slow down or otherwise not fulfill the obligations Congress placed on the FAA to implement the secondary cockpit barrier mandate. We would note that 110 members of this body, including many members of this Committee,

transmitted a letter to the DOT unequivocally reinforcing the statutory intent of Section 336—specifically, the FAA must issue an order, without delay, by October 5, 2019, requiring the installation of secondary barriers on all new manufactured passenger aircraft off the assembly line. Failing to meet this requirement will delay implementation and evade congressional intent.

Some may argue there are questions about how to implement the legislation. However, these questions were answered years ago by request from the FAA to RTCA—a private, not-for-profit corporation—to develop secondary barrier system guidelines containing design characteristics, minimum performance criteria, and installation and certification guidance.

RTCA Special Committee 221 developed and published these guidelines in September 2011 as DO-329. This document provides the FAA with guidance needed to develop and issue a clear interpretation of 14 CFR Part 121.584 to its principal operations inspectors as they evaluate an airline's security procedures for compliance. It also provides airlines and manufacturers with approved performance standards that are suitable for meeting FAA aircraft equipment requirements for the production and installation of secondary barriers.

We urge the Committee to continue to monitor this situation, and to ensure that the FAA carries out its requirements under the law and issue the requirement for secondary cockpit barriers by October 5, 2019.

Safe Shipments of Hazardous Materials

ALPA has long advocated for improved transport requirements for hazardous materials both as a member of IFALPA and here in North America as well. We have worked with this Committee to ensure that the safe transport of lithium batteries can occur with adequate risk-mitigation techniques in place and are especially appreciative of Chairman DeFazio's long-standing commitment to improving the safety of lithium battery transport by air.

Although lithium batteries represent a significant technological improvement over older battery technology, their high energy density and flammability make these batteries more prone to failure, resulting in fire and explosion. The lack of comprehensive hazardous materials regulations for the carriage of lithium batteries as cargo onboard commercial aircraft, both passenger and cargo, continues to pose risks to air transportation.

New standards implemented by ICAO on April 1, 2016, made significant improvements to provisions under which lithium batteries are shipped as cargo by air around the globe. We are pleased that Section 333 of the FAA Reauthorization Act of 2018 directed the DOT to harmonize the U.S. regulations with those put in place by ICAO. This important and critical step ensures that until there are technologies that can fully contain a lithium battery-induced fire, the shipments are limited.

While the harmonization of the U.S. regulations to ICAO limitations is a good first step, it does not go far enough in addressing the safety risk created by lithium batteries. Work must continue to develop and mandate performance-based packaging standards that will prevent and/or contain a lithium battery fire. Unfortunately, this work has taken much longer than ICAO had planned, and it will continue into 2020. ALPA continues to advocate to ensure that the threat of external fires is addressed and that the battery/packaging testing ensures the safe transportation of these hazardous materials. We resolve to continue collaboration with the Committee to improve the shipment of lithium batteries by air.

Undeclared Hazardous Materials Pose a Threat

We are pleased that undeclared hazardous materials were addressed by Section 583 of the FAA Reauthorization Act of 2018, which directs the Department of Transportation (DOT) to develop an undeclared hazardous materials public awareness campaign. The DOT's Pipeline and Hazardous Materials Safety Administration (PHMSA) has developed the "Check the Box" educational program to begin to address the risks posed by undeclared hazardous materials shipments, as well as the FAA's program on undeclared hazardous materials. This is an important effort that should help raise awareness among shippers.

Hazardous materials, comprised of liquids, flammables, and other materials, shipped as cargo without being identified by the shipper are considered undeclared hazardous materials. There are no official estimates of what percentage of parcel

shipments contain undeclared hazardous materials; however, the FAA tracks incidents where hazardous materials shipments create safety hazards for various reasons, such as a leaking package or other type of external evidence that the package is a safety concern. In 2018, the FAA received 1,346 reports of such events; 644 of the incidents involved undeclared hazardous materials.

Reducing Health Risk with Oxygen Mask Rule Changes

Section 579 of the FAA reauthorization Act of 2018 states that not later than one year after the date of enactment that “the Administrator of the Federal Aviation Administration shall issue a final regulation revising section 121.333(c)(3) of title 14, Code of Federal Regulations, to apply only to flight altitudes above flight level 410.”

In partnership with the airlines, ALPA supported this section of legislation. We are increasingly concerned that the FAA will fail to meet the required deadline for implementation of this rule. Airline pilots will immediately benefit from the implementation of this legislation reducing the frequency of oxygen mask use by flight crews. Currently, pilots are required to don the mask when operating above flight level 250 at all times when they are the only pilot in the cockpit. The legislation changes the minimum altitude for this requirement to flight level 410. The legislation brings the U.S. regulations into harmonization with ICAO and will ensure that aviation safety is maintained while also relieving pilots from potential health risks associated with using the oxygen masks that are not likely cleaned between each use.

Strengthening Voluntary Safety Reporting Programs

Voluntary safety reporting programs such as the Aviation Safety Action Program (ASAP) and Flight Operations Quality Assurance (FOQA) are important, collaborative tools that enhance aviation safety through the analysis of voluntarily reported safety events and discrepancies that lead to the prevention of accidents and incidents. The purpose of ASAP and FOQA is to encourage and use voluntarily reported safety information provided by frontline employees and airlines, respectively, to identify safety risks. Without these valuable safety reports, unidentified risks go unmitigated and remain within the system.

Automatic Acceptance

We were pleased to see that Section 320 of the FAA Reauthorization Act of 2018 included the provision that “there shall be a presumption that an individual’s voluntary report of an operational or maintenance issue related to aviation safety under an aviation safety action program meets the criteria for acceptance as a valid report under such program.” Directing the FAA to change ASAP to reflect this presumption will improve and increase the safety benefit of ASAP and voluntarily submitted aviation safety information by automatic acceptance of ASAP reports. This should be included in the new ASAP Advisory Circular, AC 120-66C.

Several airline ASAPs already have automatic acceptance protocols built in (e.g., American and Delta Air Lines). However, where ASAP reports are not automatically accepted, the safety benefit is delayed, sometimes by weeks or longer, waiting for an

Event Review Committee (ERC) to meet, review, and accept these reports. Under an automatic-acceptance scenario, the safety benefit of the information will be realized immediately. As recognized in Section 320, a report could still be ultimately excluded when the ERC convenes, and it is determined to meet established exclusionary criteria. The automatic-acceptance model works and will now be universal to ASAP, thanks to the work of this Committee.

Improving Aircraft Air Quality

Section 326 of the FAA Reauthorization called for expanded education programs, reporting guidelines, and research related to air quality on aircraft. ALPA supports these initiatives as critical first steps to improving air quality and health and safety aboard aircraft. We note that the FAA has missed the deadlines of 180 days for a study by the Airliner Cabin Environment Research Center of Excellence and for reporting guidelines. ICAO has reporting protocols (Advisory Circular 344) that could easily be assimilated to use for fume events and would help to standardize reporting. Similarly, the one-year mark for educational materials is close approaching, and we hope the FAA will prioritize action on air quality.

Safe Integration of Unmanned Aircraft Systems and Drones

Section 341 of the FAA Reauthorization Act of 2018 establishes law that requires the FAA to continue to utilize comprehensive planning for the integration of unmanned aircraft systems (UAS). The comprehensive plan includes the identification of policies and regulations that need to be established in order to safely integrate UAS into the

airspace system. However, contrary to the direction provided by Congress, the FAA is in the process of issuing waivers to large volumes of regulations to companies, allowing them to bypass many important safety regulations in order to start a commercial UAS package-delivery service. Several of the applications, if approved, would authorize the flights without any limitations to flying over large airports, residential areas, or other populated areas.

While this “regulation by exemption” accelerates the FAA UAS implementation, it is counter to the FAA’s stated policy of “crawl, walk, run” for the introduction of new technology, capability, and procedures. It also appears to be counter to Section 341 of the FAA Reauthorization Act which encourages the FAA to utilize traditional policy and rulemaking practices, not exemptions to waivers. The FAA has historically established regulations based on accidents and incidents to establish the current FARs. Aviation regulations represent a safety framework for which commercial for-hire operations are conducted. Issuing exemptions to so many of the requested areas appears to erode the safety levels established by the FAA through regulation, many of which were established as a result of accidents and incidents with injury and loss of life to passengers and people on the ground.

We must not allow pressure to rapidly integrate UAS into the national airspace system without appropriate safeguards in place. This process must be focused on safety as the highest priority. Risk-mitigation plans, which have yet to be fully developed, combined with consensus-based technology standards that will ensure

interoperability with manned aircraft, must be in place before a UAS can occupy the same airspace as manned aircraft or operate in areas where it might inadvertently stray into airspace occupied by airliners. When UAS operate in the same airspace as airline aircraft, the pilots will need to be able to see them on cockpit displays, and air traffic controllers will also need to see them on their displays to safely separate air traffic. Further, the UAS must be equipped with active collision-avoidance technology. We will oppose any integration that does not include collision-avoidance systems that are interoperable with airline collision-avoidance systems.

Small UAS (sUAS) Identification and Tracking Technologies Are Needed

At the end of last month, the FAA announced that their rulemaking effort on sUAS identification and tracking has once again been delayed, this time until at least December.

Now that Congress has removed the FAA's barriers to regulating model and hobby small UAS in the FAA Reauthorization Act of 2018, the FAA urgently needs to implement mandatory identification and tracking capabilities.

If an identification and tracking system had been in place prior to the October 2016 collision with the Army helicopter, much more information would have been immediately available to accident investigators and law enforcement. Such a system would likely have prevented the collision in the first place, because law enforcement may have observed the sUAS operating on a previous flight, and proactively contacted

the hobbyist about the illegal use of the aircraft. Until there is a way for law enforcement to identify and track down the sUAS operators, there is very little incentive for non-conformist hobby operators to operate sUAS safely.

Commercial Spaceports

ALPA is pleased to see that Section 580 of the FAA Reauthorization Act addresses the topic of spaceports. The safe integration of commercial space operations is reliant on a safe location from which to launch and recover commercial space vehicles. The integration of commercial space operations likely requires the spaceports to be located in geographic areas that allow for the launch and recovery of commercial spacecraft without unacceptable levels of risk exposure to other nonparticipating aviation operations, including commercial airline operations. The strategic placement of commercial spaceports with safe integration of commercial space operations as a top priority should result in a solid foundation from which commercial space integration with other airspace system uses can be safely conducted. We urge Congress to monitor the FAA plan for commercial spaceports, to ensure that their placement does not add safety risk to commercial airline operations.

Addressing All-Cargo Airline Safety

It is an unfortunate fact that many of the safety and security layers working to protect our passenger airline industry are absent from all-cargo operations. Cargo airlines fly the same aircraft, take off and land from the same airports, utilize the same airspace, and fly over the same cities as passenger aircraft. From a safety and security

standpoint, there is every reason to hold all-cargo operations to the same safety and security standards as passenger operations. All-cargo airline operations currently experience an accident rate that is seven times higher than passenger airline operations worldwide.

ALPA is pleased the FAA reauthorization included fatigue-mitigation provisions for flight attendants and FAR Part 135 operations. However, the continued exclusion of the all-cargo sector presents an ongoing threat to aviation safety for all of us. We look forward to the introduction of the Safe Skies Act in the House to eliminate the disparity between flight-time/duty-time rules for passenger and cargo, and we implore this Committee to work for its swift adoption and to hold the Administration accountable to ensure one level of safety.

ALPA has maintained a strong stance that all-cargo operations must have the same level of safety as passenger airlines. The facts, however, speak for themselves. There have been five fatal all-cargo 14 CFR Part 121 accidents in the United States in the past decade, with 15 fatalities. This includes the fatal accident on February 23, 2019, of an Atlas Air Boeing 767, not far from Houston, Texas.

Two Pilots Are Needed in Today's Airline Cockpit

It is important to note that the FAA Reauthorization did *not* include a requirement for the FAA to establish a program related to the concept of single-pilot 14 CFR Part FAR 121 all-cargo airline operations. The program would have created a new multiyear

funding obligation for the FAA to run a promotional program—despite, the agency’s foundational safety mandate—in support of unsafe, single-piloted commercial operations. ALPA took the initiative to measure public perception of the concept of a single pilot at the controls of an airline aircraft. In a public poll in 2018, 80 percent of respondents agreed that at least two pilots working together in the cockpit are best equipped to handle flight emergencies, while 96 percent said federal aviation research dollars should be directed at projects other than those aimed at eliminating pilots from the cockpit.

Even when the proposal for an FAA program was removed from the legislation, we continue to assess the feasibility of single-pilot airline operations. In short, we have documented many technical, regulatory, and financial barriers that indicate that single-pilot operations are a nonstarter either financially or due to safety and operational factors. More importantly, our continued record of safe landings clearly demonstrates that fewer than two pilots on commercial airliners is a threat to aviation safety and the concept should be shelved permanently. (See our white paper, “The Dangers of Single-Pilot Operations,” at www.alpa.org/whitepapers.)

Fair and Open Skies—Ensuring that Aviation in America Remains Safe and Strong

While not specific to FAA implementation, we would be remiss not to highlight the work of this Committee to include the flag-of-convenience provision in the House-passed FAA reauthorization bill. ALPA would like to thank Chairman DeFazio and

Chairman Larsen, as well as Representatives Davis, Davids, and Ferguson, for their ongoing leadership on an important issue that threatens thousands of high-quality airline jobs in our country. On July 10, they introduced H.R. 3632, the Fair and Open Skies Act. The legislation provides a bipartisan solution to ensure the enforcement of our Open Skies agreements by bolstering the DOT's oversight of an air carrier when it seeks an operating certificate to conduct service to the United States. Specifically, the Fair and Open Skies Act clarifies in statute that a multifactor public-interest test must be given consideration before the issuance of a foreign air carrier permit, revises the public-interest test to examine whether a foreign air carrier is a flag of convenience or is otherwise undermining U.S. labor standards, and requires European air carriers abide by the labor chapter of the U.S.-EU Open Skies Agreement as ratified by our government—ALPA has traditionally supported the opportunities created by our more than 120 Open Skies agreements. When properly enforced, these agreements promote benefits for U.S. carriers, workers, and passengers. Collectively, the reforms provided in the Fair and Open Skies Act will help ensure these agreements operate as intended and that the liberalization of air services is beneficial to all parties, including nation states, U.S. employees, and air carriers. This legislation will ensure that DOT gives proper consideration of a foreign airline's business practices, including those who may employ businesses practices with questionable safety oversight or regulatory schemes to be fully vetted before granting a permit to fly to the United States.

Conclusion

We appreciate the Committee's invitation to offer our insights and perspectives on these important aviation safety issues today. More importantly, we appreciate the leadership that continues to be demonstrated by the Committee to advance these high-priority safety issues. The airline industry is best positioned to fully meet the needs of all passengers and shippers when safety levels remain at, or exceed, their current levels. It is in our collective best interest as legislative leaders, labor organizations, companies, and regulators, to ensure the foundation of safety is solid, and continues to lead the rest of the world. We look forward to working on these issues with you in the coming months as we strive to make meaningful safety improvements to aviation.

