



# Transport Workers Union of America, AFL-CIO

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**"AMERICA'S FIGHTING DEMOCRATIC UNION"**

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July 15, 2021

The Honorable Steve Dickson  
Administrator  
Federal Aviation Administration  
800 Independence Avenue SW  
Washington, D.C. 20591

Dear Administrator Dickson,

On behalf of more than 150,000 members of the Transport Workers Union of America (TWU), I am writing to call your attention to the dangerously low staffing levels that exist today at most U.S. airlines. We ask that the FAA help us ensure that all carriers are safely meeting market demands. Today, there is a staffing crisis at our airlines that is creating significant operational concerns that undermine the safety and efficiency of our aviation system. Overworked, fatigued workers are being pushed to maintain safety and security standards without the necessary number of personnel. This crisis is adversely affecting the health, safety, and wellbeing of airline workers, risking the safety of our aviation system, and undermining the long-term health of the entire system.

The TWU represents ramp workers, fleet service agents, mechanics, flight attendants, aircraft fuelers, material specialists, gate agents, dispatchers, and pilot instructors at 17 airlines. We are uniquely positioned to identify and address systemic issues that arise across airlines, workgroups, and the industry at large. Under normal conditions, these workers professionally handle high-stress and physically taxing situations in order to ensure air travel remains a safe, secure, and reliable mode of transportation in the U.S. and across the globe.

Problems regarding cancellations, assaults on airline workers, and painful travel experiences for travelers have been well-documented in the media. The reported issues represent a small subset of the massive operational issues our members are dealing with. *Every* piece of the operation at most airlines is currently operating beyond capacity for current staffing levels. These conditions have existed since late May and, if the airlines' public plans for flying, training, and hiring hold true, will continue through the end of the summer and beyond. The predictable result of these conditions is extreme fatigue, overwork, and burnout.

The current staffing levels in the airline industry are a direct result of several airlines' failure to coordinate with their workforce to prepare for passengers' return coming out of the COVID-19 pandemic. Many airlines have published flight schedules that are simply not possible given the current number of flight attendants, mechanics, ramp workers, pilot instructors, and dispatchers at the carrier. Even with the massive cancellations we have seen at several airlines, we continue to see the use of "emergency powers" under airline contracts to override work rules, extend work hours, and revoke time off.

We are seeing thousands of examples of these conditions across the country. Below are several instances that are illustrative of the conditions TWU members are currently working in while being expected to maintain the safe and secure operation of our air system.

- Southwest Airlines flight attendants and ramp workers have been threatened with termination if they declined overtime for any reason other than sickness with a doctor's note
- JetBlue Airways and Allegiant Air flight attendants are serving duty days of almost 24 hours straight
- Dispatchers at Republic Airways have been assigned mandatory overtime during all of their scheduled days

These are not the exception – stories like these have become everyday working conditions because the airlines have failed to adequately staff for their scheduled flying. TWU members are now regularly being denied access to the use of sick leave, duty-free periods, and much needed breaks that would mitigate the harms associated with overwork.

When employees are overworked, overextended, and overstrained by airline short staffing, unnecessary risks are introduced that make safety failures more likely. Workers need to be rested and focused in order to be alert and responsive to medical emergencies, perform equipment and security checks, assess threats to the aircraft and passengers, and many other duties essential to safe operation of aircraft in our aviation system. It is not possible to achieve the level of safety required in our airspace while extremely understaffed for months at a time as we currently are.

To better understand the causes, more quickly resolve these issues, and maintain the highest possible level of safety in our airspace, the TWU would appreciate your consideration of the following questions:

- How long do airlines need to re-certify, train, and/or hire enough workers to return to normal operations? Do airlines have an acceptable plan to reach staffing levels necessary to safely operate the schedules they have filed to fly?
- Do the current staffing levels comport with the airlines' Safety Management Systems (SMS)? Have any airlines revised or made emergency alterations to their SMS in response to the current understaffing? What processes are in place to ensure that, when

staffing levels fall below minimums assumed in these SMS, these plans are updated or operations are adjusted to ensure each carrier can meet its safety obligations?

- What effect are airlines' constant use of "emergency powers" to overwork their employees having on the safe operation of these carriers? What effect will the current staffing levels have on the air system over the next six months and beyond?
- What data has the FAA collected on the effect airline staffing has on meeting safety standards? What triggers are in place at the FAA to initiate safety reviews, audits, or other actions when airlines fail to adequately staff their operations?

The TWU and our members stand ready to support a full recovery of the airline industry. In order to reach that point safely and as quickly as possible, these staffing issues must be addressed immediately. We look forward to working closely with the FAA and the airlines to return to normal operations.

Sincerely,

A handwritten signature in black ink that reads "John Samuelson". The signature is written in a cursive style with a large initial "J".

John Samuelson  
International President

CC: The Honorable Peter Buttigieg  
The Honorable Peter DeFazio  
The Honorable Maria Cantwell  
The Honorable Sam Graves  
The Honorable Roger Wicker