



May 16, 2006

Ms. Marion Blakey
Administrator
Federal Aviation Administration
800 Independence Avenue SW
Washington, DC 20591

RE: AFA request for basic radiation protections for crewmembers

Dear Administrator Blakey:

The Association of Flight Attendants-CWA, AFL-CIO (AFA) represents 46,000 flight attendants at 20 airlines nationwide. Our members fly a wide variety of routes, a significant proportion of them international.

Despite the Federal Aviation Administration's (FAA) formal recognition of crewmembers as being occupationally exposed to radiation, both from the cosmos and from air shipments of radioactive material (Advisory Circular (AC) 120-52, 1990; AC 120-61, 1994), we continue to feel troubled that there has been no move to promulgate the necessary regulation to make it mandatory to: (1) Inform crewmembers of the possible health risks associated with radiation exposure; (2) Record, monitor, and maintain a record of radiation doses incurred by individual crewmembers; and (3) Provide some measure of protection, especially important during pregnancy.

Of particular concern to our members is exposure during solar particle events (SPE) when radiation levels can rise many times within a couple of hours, and stay there for anywhere from a few hours to a few days. Meanwhile, aircraft occupants can be unknowingly subjected to radiation doses equivalent to about 10 X-rays per hour, or more, with high altitude/latitude flights most at risk. During pregnancy in particular, we firmly believe that crewmembers should be provided with options that offer proper protection.

We are writing then to formally indicate our support for requisite radiation protections for crewmembers and suggest that the following elements be included:

1. A mandatory training program to inform crewmembers of the possible health risks associated with in-flight radiation exposure;

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2. A requirement to keep track of the estimated dose of radiation for each crewmember, using FAA-published dose estimates that assume normal solar activity per AC120-52, coupled with an indicator of any travel during SPE; and
3. A requirement to participate in a solar flare awareness program to ensure the protection of crewmembers' health, especially important during pregnancy.

Crewmember training, radiation dose monitoring, and special protections during pregnancy have been law in Europe since June 1996, with all airlines in member countries having to comply since June 2000. More recently, Transport Canada has indicated their intent to regulate. The protections that listed in this letter are justifiable, low cost, and non-controversial, with potentially significant benefits for crewmembers and their families. We hope that you will join us in support.

Sincerely,



Patricia A. Friend
International President