March 30, 2010

David Michaels, PhD, MPH  
Assistant Secretary of Labor  
Occupational Safety and Health Administration (OSHA)  
U.S. Department of Labor  
200 Constitution Avenue, NW  
Washington, DC  20210

Re: Docket No. OSHA–2009–0044, Proposed Rule on Occupational Injury and Illness Recording and Reporting Requirements

Dear Dr. Michaels:

The Association of Flight Attendants-CWA, AFL-CIO (AFA-CWA), the world’s largest flight attendant union, brings together more than 50,000 flight attendants at 22 airlines. The AFA-CWA is pleased to register our strong support for the proposed rulemaking on Occupational Injury and Illness Recording and Reporting Requirements, which would restore a column to the OSHA 300 Log to record work-related musculoskeletal disorders (MSDs).

Flight attendants endure significant ergonomic stressors as they perform safety and service duties in the cramped, confined quarters of airplane cabins and galleys. Flight attendants push and pull heavy, unwieldy service carts, rotate boarding door handles, lift and lower heavy items, reach into overhead bins, and put their bodies into countless other physically stressful positions, all while their workplace experiences sudden vertical accelerations, continuous vibrations, and other unpredictable movements.\(^1\) These combined factors cause flight attendants to report high rates of both musculoskeletal symptoms\(^2\) and workers’ compensation claims.\(^3\)

In the Supplementary Information section of the proposed rulemaking notice, OSHA states that “information generated from the MSD column will improve the accuracy and completeness of national occupational injury and illness statistics; will provide valuable and industry specific information to assist OSHA in effectively targeting its inspection, outreach, guidance and enforcement efforts to address workplace MSDs; and will provide useful establishment-level information that will help both employers and employees

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readily identify the incidence of MSDs.”\(^4\) The AFA-CWA is confident that full implementation of the proposed rule, along with a strong commitment by OSHA to explain and enforce its proper and correct use by all employers, will lead to the results stated above. Our local and national safety committees are eager to obtain accurate and consistent data on MSDs experienced by flight attendants from their employers. Finally, we look forward to working with OSHA and other affected industry stakeholders to assess, quantify, and limit, to the greatest extent possible, the severity and extent of MSDs experienced by flight attendants.

Sincerely,

\[\text{Signature}\]

Dinkar R. Mokadam, OSHA Specialist
Air Safety, Health and Security Department