



March 31, 2003

**VIA INTERNET FILING AND FAX**

Mr. Gene Kirkendall  
Federal Aviation Administration  
AFS-200W, Room 831  
800 Independence Avenue, SW  
Washington, DC 20591

**RE: Docket No. FAA-2003-14578**

Dear Mr. Kirkendall:

I write to inform you that the 35 affiliated unions of the Transportation Trades Department, AFL-CIO (TTD) will not participate in the Federal Aviation Administration (FAA) proposed Aviation Safety and Health Partnership (ASHP) program and its associated Aviation Rulemaking Committee. While we intend to submit comments on the ASHP program itself, we wanted to take this opportunity to briefly explain why we are not participating in the Aviation Rulemaking Committee.

TTD's flight attendant unions,<sup>1</sup> as well as all of transportation labor, are disappointed with and angered by the FAA's decision to create a voluntary program that will halt the progress we have made over the years towards providing the nation's flight attendants with the federal safety and health protections they need and deserve. As currently designed, many aspects of the FAA ASHP proposal involving issues of jurisdiction, methodology and scope raise significant concerns. Especially troubling is the fact that the ASHP proposal relies solely on voluntary measures, with no underlying regulatory requirements or enforcement provisions.

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<sup>1</sup>The following flight attendant unions are members of TTD: the Association of Flight Attendants; the International Association of Machinists and Aerospace Workers; the International Brotherhood of Teamsters; and the Transport Workers Union.

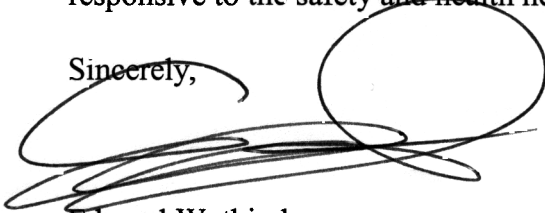
**Transportation Trades Department, AFL-CIO**

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Sonny Hall, President • Patricia Friend, Secretary-Treasurer • Edward Wytkind, Executive Director



Given these concerns, TTD, along with all our flight attendant unions, cannot in good conscience enter into a voluntary partnership program and its associated Aviation Rulemaking Committee.<sup>2</sup> Flight attendants must be provided the same mandatory job safety and health protections as other workers in the United States. Unfortunately, the ASHP will be a continuation of over 25 years of neglect and half-hearted voluntary guidelines and advisories that have failed to address the very real occupational health and safety problems of airline cabin crews. TTD, led by our flight attendant unions, categorically rejects this approach. We urge the FAA to revise the proposal and make it responsive to the safety and health needs of the nation's flight attendants.

Sincerely,



Edward Wytkind  
Executive Director

cc: The Honorable Norman Mineta  
The Honorable Elaine Chao  
The Honorable Marion Blakey  
The Honorable John L. Henshaw  
Patricia Friend, International President, Association of Flight Attendants  
Sonny Hall, International President, Transport Workers Union  
James P. Hoffa, General President, International Brotherhood of Teamsters  
Robert Roach, Vice-President, International Association of Machinists

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<sup>2</sup> TTD will be filing a more detailed response by the May 31, 2003 comment deadline.