



April 2, 2003

Dr. Jon Jordan
Federal Air Surgeon
Federal Aviation Administration
Office of Aviation Medicine
800 Independence Avenue, SW
Washington, DC 20591

RE: Request for emergency order to address risk of SARS transmission on aircraft.

via fax and mail

Dear Dr. Jordan:

As Director of the Safety, Health and Security Department of the Association of Flight Attendants, AFL-CIO, I am writing to request that the Federal Aviation Administration issue an emergency order, as described below, to reduce the risk of transmission of Severe Acute Respiratory Syndrome (SARS) on aircraft to cabin crew.

The primary reason for this request is the evidence of disease transmission on aircraft. A Singapore Airlines flight attendant was diagnosed with SARS after working on a March 14 flight between New York and Frankfurt that was carrying an infected doctor and his family on board. In addition, 13 passengers were apparently infected with SARS during an Air China flight on March 15 (International Herald Tribune, "World's airports step up measures to fight SARS", 29 March 2003).

According to a review of a SARS cluster in Hong Kong, recently published in the New England Journal of Medicine¹, there is evidence that "minimal contact" is enough to spread the disease. There is additional evidence of disease transmission without close physical contact in the report of the Amoy Gardens apartment complex in Hong Kong, where more than 200 residents are now under quarantine.

According to the Centers for Disease Control and Prevention (CDC), 72 cases of confirmed or probable SARS have already been reported in the United States. The World Health Organization (WHO) has reported additional cases in Canada, Taiwan, Italy, Singapore, and Thailand. Australia and Belgium reported their first probable cases yesterday. This disease is spreading rapidly and there is no time to utilize standard rulemaking channels. An outbreak of this type and proportion requires that standardized and requisite protective measures be implemented immediately.

¹ Tsang, KW; Ho, PL; Ooi, GC, et al. "Cluster of Cases of Severe Acute Respiratory Syndrome in Hong Kong" New England Journal of Medicine, Early Release Article (March 31, 2003).



The CDC has issued a travel advisory, recommending that passengers planning elective or non-essential travel to mainland China, Hong Kong, Singapore, and Vietnam (Hanoi) "postpone their trips until further notice." Flight attendants do not have that luxury. As such, they need to be protected.

Reports indicate that SARS can be spread in the following two ways: (1) Inhaling infected droplets that are airborne; and (2) Touching infected objects (such as a cup, meal tray, or seatback) and then inadvertently transferring the infectious agents to one's mouth or eyes. In addition, the CDC recommends that flight attendants essentially assume the role of a caregiver by isolating sick passengers, as necessary. If flight attendants do assume this responsibility, then the degree of contact – and therefore the risk of disease transmission – increases.

To address these serious issues, we request that the FAA issue an emergency order as follows:

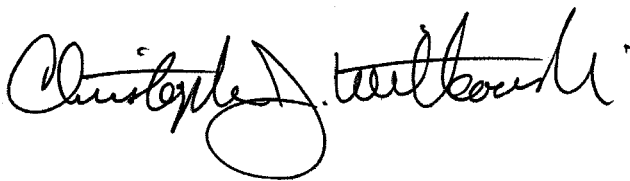
1. Require the airlines to provide flight attendants with non-latex gloves and masks that are determined appropriate protection by the CDC or the WHO, at least on flights to, from, and within at-risk areas (currently Asia and parts of Canada, although this definition may change with the spread of the disease). Flight attendants who opt not to wear said masks and gloves must not be disciplined.
2. At the very least, require the airlines to permit flight attendants, working on flights as defined in paragraph #1 above, to wear their own masks and gloves without any discriminatory action being taken against them.
3. Require the airlines to use established methods to communicate the importance of thorough and regular hand washing, and not touching one's face, to flight attendants (e.g., email, website, flyers, posters) and passengers (e.g., in-flight announcement).
4. Require the airlines to develop, implement and enforce passenger-screening standards, as recommended by the WHO, CDC or the relevant National health officials. The program that is being introduced at Toronto's Pearson Airport may be a good template (New York Times, "Canada to Screen Airline Passengers for Respiratory Ailment", 29 March 2003). The WHO has recommended screening in affected areas. See attachments.
5. Require the airlines to provide appropriate guidance to flight attendants in the event that a passenger exhibits symptoms during a flight.

We believe that the FAA Administrator has the authority to issue such an order under 49 U.S.C. 44701(a) in light of the serious threat that this outbreak poses to flight attendants and passengers on flights into and out of affected areas.

SARS has left many more unanswered questions than it has answered, but given the reports of disease transmission on aircraft, the evidence that minimal contact can be sufficient to spread the disease, and the potential for close contact if flight attendants must isolate potentially infected passengers, we ask that you will carefully consider this proposal.

Although it is not possible to predict how this outbreak will behave, the simple, proactive measures outlined above could save millions of dollars – and untold lives. I request that you advise me by Friday, April 4 as to what action, up to and including an order from the Secretary of Transportation, either will or may be taken to implement these measures. Thank you for your consideration.

Sincerely,

A handwritten signature in black ink, appearing to read "Christopher J. Witkowski". The signature is fluid and cursive, with a large loop at the end of the last name.

Christopher J. Witkowski
Director
Air Safety, Health & Security Department

Cc: Norman Mineta
Marion Blakey

Attachments: 2 - WHO Communicable Disease & Surveillance Response
http://www.who.int/csr/don/2003_03_27/en/print.html
http://www.who.int/csr/sarsareas/2003_03_27/en/print.html