May 15, 2006

National Weather Service
Office of Climate, Water and Weather Services
Aviation Services Branch
1325 East-West Highway, SSMC2
Silver Spring, MD 20910
Attention: Beth McNulty, Meteorologist & Dorothy Haldeman, Meteorologist

RE: Value of SEC real-time solar wind data and derivative products

Dear Ms. McNulty & Ms. Haldeman:

The Association of Flight Attendants-CWA, AFL-CIO (AFA) is the largest flight attendant union in the world, representing 46,000 flight attendants at 20 airlines. Our union advocates on a number of health issues for crewmembers, including the potential risks of exposure to cosmic and solar radiation, especially during pregnancy. Of particular concern to our members is radiation exposure during solar particle events (SPE). We understand that during SPE, radiation levels can increase by orders of magnitude and be sustained at such levels for as long as a few days. Meanwhile, aircraft occupants can unknowingly be subjected to radiation doses equivalent to about 10 X-rays per hour, or more, with high altitude/latitude flights most at risk.

As you may know, the Federal Aviation Administration (FAA) has had jurisdiction over the health and safety of flight attendants and pilots in the US since 1975. It has now been 31 years since the FAA assumed that jurisdiction and six years since the European Union passed legislation to monitor and inform crewmembers about exposure to cosmic and solar radiation, including special pregnancy protections. Despite European recognition of the radiation hazard to crewmembers, the FAA has not issued a single regulation on the subject. As a result, crew and passengers are uninformed, unmonitored, and unprotected from excessive radiation during commercial flights, and of these, pregnant women are uninformed as to how to protect their unborn children.

AFA believes that at the very least, pregnant crewmembers have the right to be informed about a SPE and should be able to cancel attendant trips without financial penalty or discipline. Passengers should have these rights too. Exposure to large SPE may have real impact on the developing fetus, especially during windows in the first trimester when the developing brain is especially susceptible to radiation. Currently, the only means that a pregnant crewmember or passenger has to know if there is a solar particle event is to check the Space Environment Center (SEC) website prior to departing for the airport. AFA advertises this fact on its website and to its members that request information on pregnancy protections. As such, the SEC solar wind data provides an invaluable public service that no other organization has or can provide. In addition, we recognize that the SEC solar wind data provides critical information to air carriers to ensure that their communications are not hindered by solar activity when flying polar routes.

We understand that the satellite that collects the SEC solar wind data is already past the end of its design life. To ensure that the more than 90,000 flight attendants and 65,000 pilots in the US – not to mention the millions of passengers that fly each year - are not without this valuable and far-
reaching service, we urge Congress to expedite the funding for the replacement satellite. Without the SEC data, airlines risk losing communications during high altitude and latitude flights, and pregnant crewmembers and passengers would be flying blind, possibly putting their unborn children at risk of mental retardation, congenital malformations, growth restrictions, or miscarriage.

AFA is grateful for the opportunity to submit comments on such an important program and we emphasize our strong endorsement of efforts to expedite funding in order to ensure the ongoing collection of solar wind data in real time.

Sincerely,

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