Noise and Hearing Protection

Posted On: Nov 15, 2011 (11:04:36)

Noise and Hearing Conservation
The Basics

The following comments were submitted (in slightly revised form) to the Occupational Safety and Health Administration (OSHA) in conjunction with a “conversation with stakeholders” meeting Nov. 3, 2011 in Washington, DC. During this meeting, Bill Kojola of the AFL-CIO Safety and Health Department presented brief oral remarks (2:15 audio available in wav, which can be opened with most audio players, or wma for Windows Media Player) summarizing flight attendant concerns with noise and hearing protection.

On July 10, 1975, the Federal Aviation Administration (FAA) published a Notice in the Federal Register (40 Fed. Reg. 29114, 1975) to assert complete and exclusive jurisdiction over crewmember health and safety on “civil aircraft in operation . . . from the time it is first boarded by a crewmember, preparatory to a flight, to the time the last crewmember leaves the aircraft after completion of that flight...” Since 1975, this claim has effectively prevented comprehensive OSHA standards from being applied to flight attendants working in the cabins of commercial transport airplanes. While FAA regulations limit engine noise around airports and as aircraft fly overhead, limits on airplane interior noise levels or occupational hearing protection programs are not required. Given the lack of cabin noise regulations, AFA members at two airlines requested and obtained National Institute for Occupational Safety and Health (NIOSH) Health Hazard Evaluation (HHE) studies.

The first HHE involved Horizon Air in Portland, Oregon. Data were obtained in May, 2003, and the final report published in February, 2004 (HETA #2002-0354-2931). According to the report, NIOSH researchers “measured noise levels in the cabins of six aircraft ... during take-off, landing, and at cruising altitude” and “spoke to the flight attendants about their noise concerns.” NIOSH found that “noise levels on individual flights [were] not great enough to increase a flight attendant’s or passenger’s risk for hearing loss.” However, “[i]f the [noise and vibration suppression] NVS system is not working on turboprop aircraft, there could possibly be noise overexposure” and “[t]he pattern of noise measured in the cabin is of a type that can lead to interference in communication between employees and between employees and the passengers.”

What’s important to note here: On the NIOSH-tested aircraft, all NVS systems were operational. However, according to one local union representative, NVS systems on Bombardier Q400 turboprop airplanes operated by Horizon Air are inactive on approximately 50% of flights. As this NIOSH HHE was conducted in full cooperation with the employer, it’s not surprising that noise levels were only measured with active NVS systems. The reason that the local union reports half of flights are operated with inactive NVS systems: The FAA allows operators of Q400 aircraft to fly for up to 120 days before NVS repairs must be made, to allow as little disruption to operations as possible, and because such systems are not considered critical to the safety of flight. One could argue whether NVS is or isn’t critical to flight safety; however, NIOSH has acknowledged the important role of NVS in controlling the noise exposures to cabin crewmembers. Horizon’s answer has been to allow the use of ear plugs, which simply shifts the burden of health protection to workers. Meanwhile, the FAA preemption of OSHA jurisdiction means flight attendants have no government agency to petition that takes their occupational health concerns seriously and has the authority to require corrective actions. It also means that airlines will not typically provide hearing conservation, audiometric testing and exposure monitoring programs unless negotiated through the contractual bargaining process.

The second NIOSH HHE involved Mesaba Airlines in Minneapolis, Minnesota, which at the time operated under code-sharing agreements with Northwest Airlines (which has since merged with Delta Air Lines). Data were obtained in November, 2004, and the final report published in August 2006 (HETA #2003-0364-3012). NIOSH researchers measured “personal noise exposures for 20 flight attendants” and “area noise in the back of the passenger cabin during take-off and landing and at cruise altitude” and found that “personal noise measurements for a few flight attendants were above or near the recommended limits of NIOSH” and that the “area noise measurements were slightly louder in aircraft that the flight attendants had identified as ‘noisy.’” As a result of this testing, NIOSH recommended that Mesaba...
management “measure personal noise exposures in the aircraft on a periodic basis” and begin a “hearing testing program to insure that flight attendants are not showing changes in their hearing.” AFA local union representatives report that Mesaba management has followed neither of these recommendations, although the flight attendant manual does include a paragraph recommending that employees wear “available hearing protection while working in areas with high noise exposure such as: ... On board the [Saab] SF340 aircraft” and “[a]ny place you have to shout to be heard.”

The two examples cited above are typical for the commercial air transport industry. Given the FAA’s nearly exclusive focus on aviation safety, occupational safety and health receive far too little attention. Therefore, flight attendants believe that the only effective means to address workplace noise (and other) hazards on airplanes are to apply and enforce OSHA standards.

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