



*A bold voice for transportation workers*

April 1, 2014

The Honorable Anthony Foxx  
Secretary  
U.S. Department of Transportation  
1200 New Jersey Avenue, S.E.  
Washington, DC 20590

Dear Secretary Foxx:

On behalf of the undersigned affiliated unions of the Transportation Trades Department, AFL-CIO (TTD) we urge you to reject Norwegian Air International's (NAI) application for a foreign air carrier permit that is now pending before the U.S. Department of Transportation (DOT). TTD and its aviation unions have already submitted extensive arguments on why NAI's application is contrary to our nation's international obligations, inconsistent with U.S. law, and would allow NAI to gain an unfair advantage over U.S. carriers and their employees.

We add our voice to this debate for several reasons. We believe that if the U.S. DOT approves this flag of convenience scheme, it will set a precedent for other foreign air carriers to exploit and follow. NAI is promoting a business model that has become all too familiar to the U.S. labor movement: undercut the competition by scouring the globe for cheap labor, diminished collective bargaining rights and weak regulations. The airline has registered in Ireland, even though it will not service Irish airports, and has chosen this path to avoid Norway's labor and tax laws. It will contract – or more accurately “rent” – much of its flight crew from Thailand using a recruitment firm based in Singapore. In doing so, NAI will be able to undercut U.S. airlines and their employees by as much as 50 percent.

Finally, as TTD and its aviation affiliates have demonstrated, the NAI scheme would violate the U.S.-EU Open Skies Agreement which expressly bars this sort of business model through adoption of a labor article – embodied in Article 17 bis of the agreement – that embraces “high labor standards.” We urge you to uphold the spirit and intent of this important labor provision when implementing the Open Skies Agreement, and reject NAI's application.

As the representatives of unions that represent workers in several sectors of our economy we have seen first-hand the effects of un-checked globalization on the American workforce. Too often, poorly conceived and badly enforced free trade agreements have led to the offshoring of U.S. jobs. That is why U.S. industries that previously formed the backbone of our economy have seen dramatic job losses that have coincided with the erosion of the middle class. We cannot allow a similar fate to befall the U.S. aviation industry and lose a creator of middle-class jobs and a pillar of our inter-connected transportation system.

**Transportation Trades Department, AFL-CIO**

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Edward Wytkind, President / Larry I. Willis, Secretary-Treasurer



We stand unified with U.S. and European airline unions in steadfastly opposing the NAI application. Thank you for your consideration of our views.

Sincerely,



John Thacker  
Conference President  
National Conference of Firemen  
and Oilers, SEIU



Donald Marcus  
President  
International Organization of Masters,  
Mates & Pilots, ILA



Robert Scardelletti  
National President  
Transportation Communications  
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Gunnar Lundeberg  
President  
Sailors' Union of the Pacific



Tim Barnes  
Legislative Representative  
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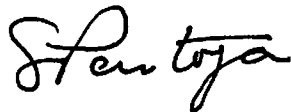
F.L. McCann  
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American Train Dispatchers Association



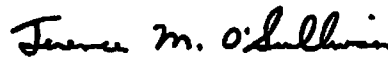
Dan Pickett  
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Brotherhood of Railroad Signalmen



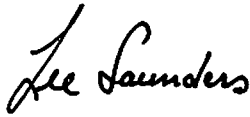
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