



*A bold voice for transportation workers*

May 16, 2014

Ms. Amanda Huetinck  
Mobility Division,  
Wireless Telecommunications Bureau  
Federal Communications Commission  
445 12<sup>th</sup> ST SW  
Washington, DC 20554

**RE: Expanding Access to Mobile Wireless Services Onboard Aircraft  
WT Docket No. 13-301; FCC 13-157  
Notice of Proposed Rulemaking  
Federal Communications Commission**

Dear Ms. Huetinck:

On behalf of the Transportation Trades Department, AFL-CIO (TTD), I write in opposition to the Notice of Proposed Rulemaking (NPRM) issued by the Federal Communications Commission (FCC) that would change its longstanding rules that currently ban passengers from using mobile communication services while in-flight. By way of background, TTD consists of 32 affiliated unions that represent workers in all modes of transportation, including those who work in the aviation sector who would be directly impacted by this rulemaking. Several of these affiliates have also submitted comments into the docket, specifically, the Air Line Pilots Association (ALPA); the Association of Flight Attendants-CWA (AFA-CWA); the International Association of Machinists and Aerospace Workers (IAM); and the Transport Workers Union of America (TWU).

TTD opposes the FCC NPRM which seeks to issue new rules to provide airlines subject to applicable Federal Aviation Administration (FAA) and Department of Transportation (DOT) rules, the choice of whether to enable mobile communications services using an Airborne Access System, and if so, which specific services to enable. As TTD stated in the comments we filed to the DOT's ANPRM addressing the potential implications of this FCC rulemaking, we believe allowing passengers access to mobile communication services while in-flight would create

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needless safety issues and security risks.<sup>1</sup> Overturning the two-decades-old ban would allow passengers to talk on their phones, increasing cabin noise levels and making it difficult for flight attendants and pilots to communicate routine and emergency safety announcements to passengers. It could also provide terrorists with new opportunities to inflict harm on our aviation system by making it easier to launch a coordinated attack by communicating in real time with other terrorists aboard the same or multiple aircrafts. We believe that this rulemaking, if implemented, would be detrimental to the safety of our aviation system, and we urge the FCC to withdraw the NPRM.

TTD agrees with the significant security concerns raised by AFA-CWA, IAM, TWU and others in their joint filing. Their comments highlight several new capabilities created by this rulemaking that terrorists could exploit to improve their chances of successfully carrying out attacks using our aviation system. As the commenters note, our nation's aviation system remains a target for terrorists, and we must do what we can to continue ensuring the safety and security of the system while rejecting policies that would move in the opposite direction.

Additionally, we agree with the concerns raised by ALPA, who also requests the FCC to withdraw the NPRM. As ALPA notes, allowing passengers to talk on their phones while in-flight could create adversarial interactions between passengers and crewmembers and possibly endanger the safety of others in the aircraft cabin. We also agree with their concern for the potential of passengers to use cell phones for nefarious use that would jeopardize the security of a flight.

For the reasons noted above and the safety and security concerns articulated by our affiliates, we urge the FCC to reconsider the implications of its rulemaking and withdraw its proposal.

Sincerely,



Edward Wytkind  
President

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<sup>1</sup> DOT ANPRM on the Use of Mobile Wireless Devices for Voice Calls on Aircraft, Docket No. DOT-OST-2014-0002, comments filed on March 26, 2014.