



A bold voice for transportation workers

September 21, 2018

U.S. Department of Transportation
Docket Operations, M-30
West Building Ground Floor
Room W12-140
1200 New Jersey Avenue, SE
Washington, DC 20590

**RE: Air Cabin Temperatures, Petition for Rulemaking
Docket No. DOT-OST-2018-0097**

On behalf of the Transportation Trades Department, AFL-CIO (TTD), I am writing today to express our support for the petition for rulemaking filed by the Association of Flight Attendants-CWA, which requests that DOT establish operational standards for cabin temperatures on commercial airplanes, both on domestic flights and international flights into the United States and its territories.

Attached is a policy statement in support of the petition, adopted unanimously on September 12, 2018 at a meeting of TTD's Executive Committee.¹ The Executive Committee consists of representatives of 32 affiliate unions representing workers in all modes of transportation, including those who represent flight crewmembers.²

As our statement outlines, dangerous temperatures in the cabin are more than just an inconvenience. Extreme heat and cold can threaten the health and safety of passengers and present an unsafe work environment for crewmembers. Several recent high-profile news stories have highlighted some of the dire consequences of uncontrolled temperatures, and flight attendants and pilots across the country continue to report unsafe situations due to extreme temperatures.

¹ Attached at 1 is a policy statement, Common Sense Regulations on Aircraft Cabin Temperatures, adopted by TTD's Executive Committee in September 12, 2018.

² Attached at 2 is a complete list of TTD's 32 affiliate unions.

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Larry I. Willis, President / Greg Regan, Secretary-Treasurer



Therefore, we ask that DOT take affirmative action in the form of a rulemaking to address this issue and establish operational temperature standards. By regulating this matter, DOT can prevent troubling incidents reported by passengers and crew alike and eliminate an unnecessary safety risk to commercial passenger aviation.

We thank DOT for considering our request and hope to work with the Department on the promulgation of a much-needed regulation.

Sincerely,

A handwritten signature in cursive script that reads "Larry I. Willis".

Larry I. Willis
President

ATTACHMENT 1**COMMON SENSE REGULATIONS ON AIRCRAFT CABIN TEMPERATURES**

Many people who fly regularly are familiar with the temperature irregularities on board aircraft. You might be sweating and overheated before takeoff only to find yourself shivering and reaching for a blanket mid-flight. It is uncomfortable, for sure, but most just shrug it off as an inconvenience that comes with flying. Far too often, however, temperatures on board aircraft can rise or dip to dangerous levels, presenting a serious health and safety risk for passengers and flight crewmembers alike. Shockingly, there are no federal regulations governing internal cabin temperature. This oversight has gone on for too long, and we call on the Department of Transportation (DOT) to issue reasonable and meaningful regulations on in-cabin temperatures.

There have been several well-publicized incidents when the health of passengers or crewmembers has been threatened by extreme temperatures. In June of 2017, an infant overheated and required hospitalization while on the tarmac at Denver International Airport. Earlier, during the summer of 2013, several passengers fell ill after being subjected to overwhelmingly hot temperatures for over two hours on board an aircraft in Las Vegas, NV. These reported incidents, however, do not show the full scope of the health and safety problem presented by extreme temperatures.

On July 2, 2018, the Association of Flight Attendants-CWA (AFA-CWA), a TTD affiliate, filed a petition asking the DOT to conduct a rulemaking to prevent incidents of extreme onboard temperature conditions on commercial flights. In support of this petition, AFA-CWA included incident reports from the NASA Aviation Safety Reporting System (ASRS), a confidential, voluntary program that allows crewmembers to report incidents without fear of retaliation by their employer or the Federal Aviation Administration (FAA). These documented reports submitted by both pilots and flight attendants show how pervasive this problem is, as well as the threats they cause to safe flight operation. Extreme temperatures have caused crewmembers to fall ill, required planes to divert to different airports, and have caused severe delays when extreme temperatures require passengers to be deplaned. There have also been incidents when passengers become aggravated and even hostile due to extreme heat or cold, creating a dangerous environment for passengers and crew alike. Many, though not all of these incidents occur during lengthy delays on the tarmac.

DOT currently has the legal authority to regulate aircraft cabin temperatures. In response to public pressure over lengthy tarmac delays, Congress included language in the FAA Modernization and Reform Act of 2012 that required air carriers and airports to submit emergency contingency plans for tarmac delays to DOT for review and approval. The plans must address, among other things, how carriers will “provide adequate food, potable water, restroom facilities, comfortable cabin temperatures, and access to medical treatment for passengers onboard aircraft” when a flight is delayed on the tarmac. In a 2014 report on the impact of

tarmac delays, however, the DOT Inspector General (DOTIG) found that DOT had not defined nor required comfortable cabin temperatures. At the conclusion of the report, the DOTIG recommended that DOT “define comfortable cabin temperature and include the requirement in DOT regulations.”

On August 1, 2018 the 2Hot2Cold App was launched in order to help spur government action and to document the true scope of the problem. This free mobile app allows crewmembers and passengers to document and report incidents of extreme temperatures on aircraft. Flight attendant unions have also provided their employees with portable thermometers to provide accurate documentation. Submissions will be catalogued and submitted to DOT in support of the petition for rulemaking.

Just one incident where an infant is hospitalized or a passenger or crewmember becomes seriously ill should spur government action to ensure that these events never happen again. DOT has the ability and the obligation to issue common sense regulations on cabin temperatures in order to further advance aviation safety.

Policy Statement No. F18-05
Adopted September 12, 2018

Attachment 2



Transportation Trades Department, AFL-CIO
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TTD MEMBER UNIONS

- Air Line Pilots Association (**ALPA**)
- Amalgamated Transit Union (**ATU**)
- American Federation of Government Employees (**AFGE**)
- American Federation of State, County and Municipal Employees (**AFSCME**)
- American Federation of Teachers (**AFT**)
- Association of Flight Attendants-CWA (**AFA-CWA**)
- American Train Dispatchers Association (**ATDA**)
- Brotherhood of Railroad Signalmen (**BRS**)
- Communications Workers of America (**CWA**)
- International Association of Fire Fighters (**IAFF**)
- International Association of Machinists and Aerospace Workers (**IAM**)
- International Brotherhood of Boilermakers, Iron Ship Builders,
Blacksmiths, Forgers and Helpers (**IBB**)
- International Brotherhood of Electrical Workers (**IBEW**)
- International Longshoremens' Association (**ILA**)
- International Organization of Masters, Mates & Pilots, ILA (**MM&P**)
- International Union of Operating Engineers (**IUOE**)
- Laborers' International Union of North America (**LIUNA**)
- Marine Engineers' Beneficial Association (**MEBA**)
- National Air Traffic Controllers Association (**NATCA**)
- National Association of Letter Carriers (**NALC**)
- National Conference of Firemen and Oilers, SEIU (**NCFO, SEIU**)
- National Federation of Public and Private Employees (**NFOPAPE**)
- Office and Professional Employees International Union (**OPEIU**)
- Professional Aviation Safety Specialists (**PASS**)
- Sailors' Union of the Pacific (**SUP**)
- Sheet Metal, Air, Rail and Transportation Workers (**SMART**)
SMART-Transportation Division
- Transportation Communications Union/ IAM (**TCU**)
- Transport Workers Union of America (**TWU**)
- UNITE HERE!**
- United Mine Workers of America (**UMWA**)
- United Steel, Paper and Forestry, Rubber, Manufacturing, Energy, Allied Industrial and Service
Workers International Union (**USW**)

These 32 labor organizations are members of and represented by the TTD

