

## **REMOTE DISPATCHING IS UNSAFE DISPATCHING**

Aircraft dispatchers play an essential role in the safety of aviation operations. In tandem with pilots and air traffic controllers, dispatchers work to ensure that aircraft take off and land safely, navigating weather, traffic, and other challenges. For this reason, the parameters of their work and working environment are highly regulated, to ensure that a dispatcher is able to carry out their duties to the highest standard.

Despite this, at the height of the pandemic the FAA wrongly made the decision to grant requests from Skywest and Republic Airlines to amend their operating specifications to permit at-home aircraft dispatching. Initially, these airlines were permitted to have 20% of their dispatchers work from home, but within a few months, the FAA increased that threshold to 60%. There are no other airlines who have in place, or to our knowledge, have even requested similar allowances.

While we are appreciative of efforts to protect employees from COVID-19 transmission, this unfortunate decision was one of a number made by the prior administration that degraded safety under the guise of pandemic safety without adequate review. To date, the FAA has not conveyed that it has seriously analyzed the safety risks or regulatory compliance issues associated with an at-home dispatching structure. For example, existing regulations prohibit any person from dispatching an airplane over an approved route or route segment unless the facilities are in a "satisfactory operating condition." The FAA has made no attempt to describe how it plans to evaluate or oversee the condition of hundreds of employees' private homes.

Beyond black and white regulatory requirements, at-home dispatching also presents a number of practical challenges. An environment where background or ambient noise interferes with the quality of the communication between a dispatcher and pilot presents immediate safety risks, as do circumstances where the quality of connection of communications systems may be in question. Existing regulations already contemplate the availability and quality of satellite-based voice communications systems, but the FAA is seemingly unconcerned with the fidelity of systems in individual employees' homes.

It also is unclear that the FAA has given due consideration to other practical questions, including the cybersecurity concerns presented by hundreds of remote dispatching locations, the impacts on remote dispatching to air carriers' safety management systems, or the application of drug and alcohol testing rules. Nearly a year and a half ago, the Transport Workers Union of America requested clarification on these and other questions from the FAA. No such information has been communicated.

Without the appropriate consideration of both regulatory and non-regulatory risks, or the solicitation of the impacted workforce, the FAA cannot contend that these amendments have maintained an equivalent level of safety across the aviation system. It is also telling that since the

FAA determined that such activity was permissible, no other carriers have deemed it appropriate and in their best safety interest to pursue like models. We call on the FAA to not renew these amendments upon their July 1, 2022 expiration date, and in the event that such requests are before the FAA in the future, that the agency engage in robust safety review, to include public comment and consultation with aircraft dispatchers and their representatives.

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