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CWA

June 23, 2025

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: A4A Petition for Expedited Exemption from 14 C.F.R. 121.131(I)
Docket No. FAA-2025-0934**

To Whom It May Concern:

On behalf of the crew members represented by the Air Line Pilots Association Int'l (ALPA), the International Association of Machinists and Aerospace Workers (IAM), the Transport Workers Union of America (TWU), the International Brotherhood of Teamsters (IBT), the Association of Flight Attendants-CWA (AFA-CWA), the Communications Workers of America Union (CWA), and the Transportation Trades Department, AFL-CIO (TTD), we write to express our profound concern and strong opposition to the above referenced petition. The two-year exemption requested by Airlines for America to implement the "Installation and Operation of Flightdeck Installed Physical Secondary Barriers on Transport Category Airplanes in Part 121 Service" final rule issued by the Federal Aviation Administration (FAA) in June 2023 is an affront to the crew members who protect our skies every day. These Installed Physical Secondary Barriers (IPSBs or Secondary Barriers) are a critical addition to ensuring the security of our airspace and ensuring the safety and security of our crew members.

Original Equipment Manufacturers (OEMs) and aircraft operators will have had more than two years since the final rule was published to ensure compliance with the regulation on August 25, 2025. This is not only a regulation, but also a legislative directive by Congress requiring the installation of IPSBs on newly manufactured passenger aircraft.

Aircraft operators have had ample time to develop training material. In fact, we are aware that one OEM produced a training video that was provided for aircraft operators. Additionally, other OEMs have made their devices available for aircraft operators to produce their own training

videos. These videos should be used in conjunction with other training methods for affected crew members.

This request for exemption is merely another attempt to needlessly delay the implementation of this essential regulation that is years in the making.

Implementation and operation of Secondary Barriers must not be delayed any longer. We ask that the FAA immediately deny this request with guidance to OEMs and aircraft operators to get these devices certified and training approved by August 25, 2025. We also call on the FAA to dedicate its resources to ensure there are no delays in certification and training approvals.

Sincerely,

Air Line Pilots Association, International

Association of Flight Attendants-CWA

Communications Workers of America Union

International Association of Machinists and Aerospace Workers

International Brotherhood of Teamsters

Transport Workers Union of America

Transportation Trades Department, AFL-CIO