

November 25, 2025

Anthony M. Butters
Manager, Airport Safety Policy Branch, Office of Airports, Safety and Standards
Federal Aviation Administration
800 Independence Avenue, SW
Washington, DC 20591

**RE: Agency Information Collection Activities: Requests for Comments; Clearance of a New Approval of Information Collection: Section 353 Survey To Evaluate Airport Ramp Worker Safety
Docket No. FAA-2025-1704**

Mr. Butters:

On behalf of the Transportation Trades Department, AFL-CIO (TTD), I am pleased to respond to the Federal Aviation Administration's (FAA) request for comments regarding a survey to evaluate airport ramp worker safety. By way of background, TTD consists of 40 affiliated unions whose members work in all modes of transportation, including aviation workers like airline pilots, flight attendants, mechanics, ramp workers, air traffic controllers, professional aviation specialists, and others.¹ TTD and our affiliates strongly supported the ramp worker safety provisions in the last FAA reauthorization, and we applaud the FAA for beginning work on this important information collection. Additionally, we endorse the comments filed in this docket by our affiliates, the Communications Workers of America (CWA), the Service Employees International Union (SEIU), the Transport Workers Union of America (TWU), and the International Association of Machinists and Aerospace Workers (IAM).

Background

Section 353 of the FAA Reauthorization Act of 2024 directs the FAA to initiate a Call to Action to bring stakeholders together to share best practices and implement actions to address airport ramp worker safety and ways to minimize or eliminate ingestion zone and jet blast zone accidents. As part of this Call to Action, the FAA is proposing to issue a voluntary questionnaire to airport ground workers to identify trends, gaps in training or procedures, and opportunities for regulatory or operational improvements.

Tragically, in the last few years, there have been injuries and fatalities among ramp workers directly attributable to inadequate training and faulty equipment. Every day, airport ramp workers encounter serious hazards, including jet blasts, engine ingestion, tire explosions, and various vehicular accidents, often with limited protective

¹ Attached is a complete list of TTD's affiliate Unions

measures in place. Ramp workers' jobs are physically and mentally demanding, and their risks are exacerbated without proper training.

Sample Size and Union Engagement

We fully support the FAA's efforts to more fully understand the hazards experienced by airport ground crews and ramp workers. Current gaps in training and safety procedures have resulted in preventable loss of life, and the results of the FAA's proposed survey could meaningfully inform improved requirements aimed at reducing those gaps. We are therefore concerned that the FAA anticipates receiving only 100 responses to the survey. Such a low response rate would be unlikely to capture the full realities of working conditions, potential training deficiencies, and hazards faced by airport ramp workers.

We encourage the FAA to work to ensure as many ramp workers respond to its survey as possible. As such, we strongly recommend that the FAA engage with the labor organizations that represent many of these workers. Labor organizations are willing and able to work with the FAA to disseminate this survey and encourage their members' participation. We also encourage the FAA to work closely with labor throughout this process.

Survey Scope

We recognize that the 2024 FAA Reauthorization Act required the FAA to focus on ingestion and jet blasts when evaluating the hazards faced by airport ramp workers. However, we encourage the FAA to consider broadening the scope of this survey to include other hazards like vehicle collisions, chemical or hazardous materials exposure, extreme temperatures, and tire explosions.

Anonymity of Responses

In order to ensure responses are accurate and workers are not retaliated against by their employers, the FAA must maintain the strict confidentiality and anonymity of responses. Workers should feel comfortable providing honest, detailed responses to the FAA's survey. This is impossible if workers feel their feedback may be shared with their employers or that they may face reprisals.

Conclusion

We encourage the FAA to utilize the results of this survey to address current gaps and daily risks faced by ramp workers whose work plays a crucial role in ensuring the safety and efficiency of commercial air travel. The Agency must ensure that the workforce is well-informed and capable of responding to potential hazards on the job. We appreciate the opportunity to comment on this proposed rule and we look forward to working with the FAA in the future.

Sincerely,

A handwritten signature in blue ink, appearing to read "Greg Regan", enclosed within a light blue rectangular border.

Greg Regan
President