

July 21, 2026

The Honorable Bryan Bedford
Administrator
Federal Aviation Administration
800 Independence Avenue, SW
Washington, DC 20591

**RE: Prohibition of Remote Dispatching
Docket No. FAA-2026-5413**

Administrator Bedford:

On behalf of the Transportation Trades Department, AFL-CIO (TTD), I am pleased to respond to the Federal Aviation Administration's (FAA) Notice of Proposed Rulemaking (NPRM) regarding amendments to 14 CFR Part 121 to prohibit dispatch and flight following activities outside of locations designated as dispatch or flight following centers except in emergencies that render a dispatch or flight following center inoperable. By way of background, TTD consists of 39 affiliated unions whose members work across all modes of transportation, including airline pilots, flight attendants, air traffic controllers, professional aviation inspectors, dispatchers, and many others.¹ We are encouraged by the FAA's efforts to promulgate this overdue rulemaking and encourage the agency to consider our recommended improvements. Additionally, we endorse the comments filed in this docket by our affiliate(s), the Transport Workers Union of America (TWU).

Background

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.

Beginning in 2020, the FAA granted authorizations to Republic Airways and SkyWest Airlines permitting the carriers to allow a percentage of aircraft dispatchers to work remotely as a result of the COVID-19 pandemic. These authorizations were extended through March of 2023. Concerningly, the initial authorizations permitted only 20 percent of aircraft dispatchers to work

¹ Attached is a complete list of TTD's affiliate unions.

from home, but through subsequent extensions, their scope was expanded to allow up to 60 percent of aircraft dispatchers to work remotely.

FAA Must Fulfill This Congressional Mandate

Congress rightly recognized the inherent safety concerns stemming from remote aircraft dispatching in the FAA Reauthorization Act of 2024.² Section 420 requires the FAA Administrator to promulgate a regulation prohibiting work as an aircraft dispatcher outside of a physical location designated as a dispatching center or flight following center of an air carrier, with a limited exception for emergency situations.

Aircraft dispatchers perform safety-critical work that requires a strictly controlled operating environment. Distractions, background noise, connectivity, and cybersecurity issues that can accompany a work from home environment can all have safety implications in the national airspace system (NAS). It is therefore crucial that the FAA fulfill the Congressional mandate prohibiting remote aircraft dispatching set forth in the FAA Reauthorization Act of 2024.

Given the sensitive nature of aircraft dispatching, we also encourage the FAA to consider establishing both physical security and cybersecurity requirements for remote aircraft dispatching that may be allowed in emergency circumstances. Communication systems and sensitive information must be guarded from cybersecurity threats and aircraft dispatchers must be protected from incursions into their workspace. Congress mandated that air carriers ensure that each dispatch center “includes the presence of physical security and cybersecurity protections to prevent unauthorized access to the dispatch center or flight following center or to the operations of either such center.” It follows that remote dispatching operations should be subject to the same requirements. Minimum security requirements, both physical and cybersecurity, are a prudent safeguard the FAA should include in the subsequent final rule in this docket.

Conclusion

We appreciate the opportunity to comment on this proposal and look forward to a final rule ending the unsafe practice of remote aircraft dispatching following the passage of the FAA Reauthorization Act of 2024.

Sincerely,



Greg Regan
President

² <https://www.congress.gov/118/plaws/publ63/PLAW-118publ63.pdf>