



AIR LINE PILOTS ASSOCIATION, INTERNATIONAL

7950 Jones Branch Drive, Suite 400S | McLean, VA 22102 | 703-689-2270 | 888-FLY-ALPA

THE WORLD'S LARGEST PILOTS UNION | WWW.ALPA.ORG

July 29, 2022

Dear Senator,

On August 1, this nation marks the 12th anniversary of one of the most effective aviation safety measures in U.S. history becoming law—a law that has reduced U.S. airline passenger fatalities by 99.8 percent. Following a strong, bipartisan vote in Congress, the president signed into law the Airline Safety and Federal Aviation Administration Extension Act of 2010 (PL 111-216), which, among other improvements, established requirements for qualification, training, and experience for pilots working in Federal Aviation Regulation (FAR) Part 121 airline operations. It was an extraordinary example of Congress acting to save lives and position the United States as the global leader in airline safety.

I'm writing to make clear that maintaining the first officer qualification and training requirements developed from this legislation remains the highest priority of the Air Line Pilots Association, Int'l (ALPA). Protecting these lifesaving regulations—and fighting any effort to weaken, reinterpret, or avert them—will continue to serve as our union's highest priority as you and other lawmakers consider the next Federal Aviation Administration (FAA) reauthorization in both the 117th and 118th Congress.

In creating the airline first officer requirements, Congress recognized investigators' determination that a series of fatal FAR 121 airline accidents had resulted in part from the inexperience and inadequate training of pilots on the flight deck. The specific tragedy that galvanized public attention and directed a bright light at the shortcomings of the old requirements was the crash of Colgan Flight 3407 near Buffalo, N.Y., in which 50 people lost their lives. Following its investigation, the National Transportation Safety Board concluded that inadequate pilot training was a contributing factor in the cause of the accident.

Thanks to Congress and with the strong support of victims' advocates as well as ALPA pilots, the United States raised the pilot qualification, experience, and training bar. While Section 216 of the law required an Air Transport Pilot (ATP) certificate and 1,500 hours of flight experience for any pilot serving in FAR 121 airline operations, Congress gave the FAA the authority in Section 217 to grant credit toward the flight-hour experience requirement for academic training that enhances safety.

The FAA determined that safety-enhancing programs include military aviation and flight training as well as professional pilot academic and flight training from an accredited four-year university or two-year college as part of an associated aviation degree program. As a result, the FAA grants 750, 500, and 250 hours of flight experience credit respectively for pilots who have gone through these training programs. Aviators who don't fit into one of these safety-enhancing categories still require 1,500 hours of flight experience to qualify for the ATP. Given this credit for academic training and the resulting reduction in flight-training experience required by the FAA, identifying the law as the "1,500-hour rule," is misleading.

No organization is more committed than ALPA to ensuring that our airlines have an adequate supply of highly skilled and trained pilots—and they must have the qualifications, experience, and training they

need to perform their jobs safely. ALPA will give no ground to those who seek, through misdirection or falsehoods, to undermine or weaken the requirements and the contribution they make to one level of safety across the system.

For that reason, it is deeply troubling that some U.S. airlines are actively working to undermine air safety by attempting to avoid, work around, or weaken first officer qualification and training requirements that have proven so effective—and saved so many lives.

Recently, Republic Airways has petitioned the federal government for an exemption to allow it to apply lower first officer qualification standards to its operations—in fact, seeking to cut in half the amount of flight experience required absent data indicating doing so would enhance safety and be consistent with the FAA’s requirements. Similarly, SkyWest Airlines, which has an existing government contract to provide scheduled service to small and rural communities as a FAR Part 121 operator, is now asking to fly these routes using an alter ego charter operation using a “pilot program” loophole in the Essential Air Service statute so that reduced pilot qualification and training requirements apply to its service.

Efforts like these to undercut safety affect U.S. airline passengers in small and rural communities who rely on these individual companies for air transportation. By law, small and rural communities are entitled to the same level of safety for scheduled airline transportation service irrespective of the perceived business interests of airline managements. ALPA will not support efforts to undermine one level of safety for flight operations, whether through regulatory or legislative action.

Thanks to Congress, this country makes certain that new airline pilots have the qualifications, experience, and training they need to perform their jobs safely. The United States must not allow those who put profit before public safety to jeopardize the air transportation that U.S. passengers and shippers count on to visit loved ones and support local businesses.

From the flight deck, our members understand firsthand the value of these pilot safety requirements—and ALPA will spare no effort in making clear their importance to members of both the 117th and 118th Congress.

Sincerely,

A handwritten signature in cursive script that reads "Joseph G. DePete". The signature is written in black ink and is positioned below the word "Sincerely,".

Capt. Joseph G. DePete
President, Air Line Pilots Association, Intl.