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July 26, 2018

U.S. Department of Transportation
Office of the Secretary
1200 New Jersey Ave SE
Washington, DC 20590

RE: Petition to the Secretary of Transportation to Conduct Rulemaking to Prevent Incidents of Extreme On Board Temperature Conditions on Commercial Airplane Flights
Petition Submitted by the Association of Flight Attendants-CWA, AFL-CIO
Office of the Secretary, Department of Transportation
DOT-OST-2018-0097

On behalf of the Transport Workers Union of America, AFL-CIO (TWU), I write to support the petition for rulemaking submitted by the Association of Flight Attendants-CWA, AFL-CIO (AFA) to the Department of Transportation (DOT) in the docket captured above. The petition requests that DOT conduct a rulemaking to establish operational temperature standards on commercial aircraft and apply those standards to all passenger flights operated by U.S. commercial airlines and to foreign commercial airlines that operate flights into and/or destined for the U.S. The TWU urges DOT to fulfill the petition to ensure appropriate temperatures in aircraft cabins through all phases of flight.

The TWU represents 145,000 transportation workers across all modes of transportation, including more than 20,000 flight attendants working at Southwest Airlines, JetBlue, Allegiant Air, and Flight Services International. TWU flight attendant members have firsthand experience working in both stifling hot and shivering cold aircraft cabins, where they must carry-out their important safety and security responsibilities while interacting with often unhappy and uncomfortable passengers. These experiences have occurred at airports across the country and around the world, and during various phases of flight.

Many instances of extreme cold or heat in the cabin occur while the aircraft is on the ground. These extreme cabin temperatures can be exacerbated when the aircraft is parked at a gate or while waiting on the tarmac, where exposure to the harsh ground environment continues. Those same uncomfortable conditions often remain once in flight if aircraft systems are unable to mitigate the extreme temperatures. Malfunctioning systems and failing seals also can contribute to uncomfortable in flight cabin temperatures.

Sweltering hot or frigidly cold cabin environments create health risks for flight attendants and passengers. Reports of passengers and crewmembers sweating heavily, becoming ill, and passing out due to high cabin temperatures, for example, are alarming and clearly demonstrate the need to better control the aircraft environment.

Currently, federal law requires air carriers to create emergency contingency plans that address, among other things, how they will provide comfortable cabin temperatures for passengers onboard an aircraft when a departing flight is delayed or disembarkment is delayed. However, there are no DOT standards limiting the operational temperatures inside the cabin. Given the hardships imposed on passengers and flight attendants when cabins become too hot or too cold, we urge the DOT to begin a rulemaking proceeding and promulgate a regulation that sets operational temperature standards for aircraft cabins during all phases of flight.

Sincerely,

A handwritten signature in cursive script that reads "John Samuelson". The signature is written in black ink and is positioned above the typed name.

John Samuelson
International President