



Transport Workers Union of America, AFL-CIO

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April 6, 2020

Mr. Steve Dickson
Administrator
Federal Aviation Administration
U.S. Department of Transportation
800 Independence Avenue, SW
Washington, DC 20591

Ms. Loren Sweatt
Principal Assistant Secretary of Labor
for Occupational Safety and Health
U.S. Department of Labor
200 Constitution Avenue, NW
Washington, DC 20210

Dear Mr. Dickson and Ms. Sweatt,

On behalf of more than 65,000 aviation workers represented by the Transport Workers Union (TWU) of America, I am writing to inform you of the hazardous health and safety conditions these members face on the job due to the COVID-19 pandemic and to request immediate action on your part to help address these conditions.

The Federal Aviation Administration (FAA) and the Occupational Safety and Health Administration (OSHA) are jointly responsible for the safety and health of airline passengers and crews. Given the authority both agencies have with regard to ensuring the health and safety of aircraft cabin crewmembers, we are urging you to act in concert to swiftly address ongoing concerns with regards to the current public health crisis.

Like many of the TWU's more than 151,000 members, our flight attendants, mechanics, and ground operations workers are essential, frontline employees who have continued to report to work throughout the Coronavirus pandemic. These individuals are heroically putting themselves in harm's way in order to provide essential services. Without them air travel simply would not be possible.

Our flight attendant and ground service members, who operate at Allegiant, American, Atlas, JetBlue, and Southwest Airlines, are committed to carrying out their duties to the extent possible as this global public health crisis continues. However, they expect and deserve reasonable protections from the threat of this deadly infection. Therefore, we are asking that your agencies take action to ensure the following policies are implemented.

Improved Aircraft Cleaning and Disinfection

Aircraft must be cleaned and disinfected between flights. Professional cleaners, including those directly employed by the airlines, are trained for this work and equipped with the necessary tools, products and protective equipment to thoroughly clean the cabin. When these cleanings are done properly, passengers and crew members know that they are entering a safe, healthy space. While some airlines have independently taken measures to increase their cleaning standards, this practice has been irregular and should be standardized across carriers for the health of the entire system.

Professional, properly equipped cleaners are required now more than ever, as additional and more intensive cleaning of the aircraft is called for to help protect both crew and passengers from transmission of the Coronavirus. We know that this virus can survive on various surfaces for hours or even days. For that reason, tray tables, arm rests, and video screens all should be disinfected between flights, as should the lavatories. Furthermore, the type of refuse left behind by passengers – including used masks, gloves, disinfectant wipes, used tissues, etc. – poses a serious health hazard to whomever is charged with collecting it. This hazardous work should be undertaken by workers who have the professional training, equipment, and protective gear needed to handle these items without risk of contamination – not, as is standard at many airlines, by flight attendants who are generally working without masks or cleaning products.

For refuse collection during flights, flight attendants duties should be limited to providing a receptacle into which passengers may deposit their used items. It should be the responsibility of a professional cleaner to retrieve items from seatback pockets, between seat cushions, and the floor. Cleaners also should be responsible for handling and crossing the seat belt straps – items which, by their purposeful use, are over exposed to handling and potential transmission.

Personal Protective Equipment

All airline workers with cleaning responsibilities or who must interact with the public over the course of their workday, including flight attendants, ground operations workers, gate agents, and others, should be provided medical grade gloves and masks, which they should be allowed to wear throughout the flight. If the airline is unable to acquire facemasks, these workers must be permitted to wear masks they have obtained for themselves. Personal protective equipment must be recognized as an essential part of these workers' uniforms during this crisis.

In addition to masks and gloves, all crews should be supplied with adequate supplies of disinfectant wipes and hand sanitizer. Finally, if there is an aircraft-approved pump or spray disinfectant that could be employed for frequent sanitizing of lavatory surfaces, at minimal risk to flight attendants, the airlines should acquire and maintain adequate supplies on all aircraft.

Social Distancing

Per Centers for Disease Control (CDC) guidance, which includes social distancing practices such as "increasing physical space between employees and customers," airlines should enforce social distancing between aircraft crew and passengers by making rows of seats unavailable to passengers and allow flight attendants to vary boarding positions up to three rows at overwing window exits during passenger boarding. When flight attendants are assigned to a double jumpseat for critical phases of flight, one flight attendant should be permitted to occupy a designated alternate passenger seat in the cabin.

Currently, given the drastic decline in passenger bookings, social distancing is easy to maintain in the cabin. However, when passenger loads begin to increase but the threat of viral transmission remains, the airlines should continue these practices as a precaution against disease transmission.

In addition, on all aircraft where practicable, one lavatory – ideally the facility in the galley area – should be designated exclusively for crew use. This policy will lessen the possibility of passenger-to-crew contagion via the lavatory and also limit passenger contact with flight attendants in the galley.

Employee Notification of Potential Exposure to COVID-19

Airlines should follow CDC guidance and inform their workers of possible workplace exposure to COVID-19 if a co-worker is confirmed to have the virus. This determination may be made through a positive test or other medical confirmation. While employers must maintain confidentiality as required by the Americans with Disabilities Act, it is essential that employees who may be at risk of infection are aware that they need to self-isolate and self-monitor for symptoms of the illness. This is particularly important for cabin crew and other workers who, by the nature of their jobs, are in close contact with their colleagues in an enclosed space for many hours at a time.

I urge both the FAA and OSHA to take immediate action to ensure the health and safety of TWU's flight attendants and all cabin crew who, during this pandemic, continue to put themselves in harm's way in order to serve the public.

I look forward to your response.

Sincerely,

A handwritten signature in cursive script that reads "John Samuelson".

John Samuelson
International President