WRITTEN STATEMENT OF

AIR LINE PILOTS ASSOCIATION, INTERNATIONAL (ALPA)

BEFORE THE

SUBCOMMITTEE ON AVIATION

OF THE

COMMITTEE ON TRANSPORTATION AND INFRASTRUCTURE

U.S. HOUSE OF REPRESENTATIVES

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"STATE OF AVIATION SAFETY"

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The Air Line Pilots Association, International (ALPA), represents more than 60,000 professional airline pilots flying for 34 airlines in the United States and Canada. ALPA is the world's largest pilot union and the world's largest non-governmental aviation safety organization. We are the recognized voice of the airline piloting profession in North America, with a history of safety and security advocacy spanning more than 85 years. As the sole U.S. member of the International Federation of Airline Pilots Associations (IFALPA), ALPA has the unique ability to provide active airline pilot expertise to aviation safety issues worldwide, and to incorporate an international dimension to safety advocacy.

Overview

While 2017 was the safest on record globally, U.S. airlines operated under Part 121 have not experienced a single passenger fatality resulting from an accident since 2009; over 9 years. This is due to the efforts of aviation industry and our government partners BUT also due to the efforts of Congress. Prior to the passage of the Aviation Safety and FAA Reauthorization Act of 2010 the passenger airline industry lost approximately 1100 passengers in aircraft accidents. Since the passage of that bill there has not been a single passenger fatality.

When compared to the rest of the world, the United States passenger airline record is truly remarkable. In the same 9-year timeframe that there have been no fatal United States passenger airline accidents, there have been 81 fatal passenger accidents

around the world, which includes more than 4,100 fatalities. The most important work this committee can accomplish is to ensure the United States maintains the highest safety levels in the world and continue to lead by example. This allows passengers to board a passenger airline, or send their mail, cargo, and gifts via an all-cargo airline, and know, without a doubt in their mind, that all will get there safely. From day one in 1931, ALPA has maintained our motto of "schedule with safety". It hasn't changed; safety is still our top priority.

Thus, the hearing today is very important to ALPA. I thank you for putting the spotlight on safety because we need to keep the focus on safety constantly, and the committee is to be recognized for its efforts to do so.

We were pleased the committee chose to hold this hearing in February. As you know, the most recent passenger airline accident occurred on a cold snowy February evening in 2009, in Clearance Center, New York when Colgan Airlines Flight 3407 crashed on approach to landing. Fifty people lost their lives. Earlier this month the pilots of ALPA, and many others directly impacted by that tragic accident remembered those we lost, and recalled the horror that for some, will always be etched in our hearts and in our minds.

While we still mourn the loss of family, friends and fellow co-workers we also are able to appreciate the tremendous advancements in safety that has resulted from the focus members of Congress, the Federal Aviation Administration (FAA), and industry

collectively put into ensuring an accident like Colgan flight 3407 would be less likely happen in the future. And, given the laws and rule changes that have taken place, it appears that Congress, the FAA and industry got it right!

However, in order for the United States aviation industry to continue to be the safest and most efficient airspace system in the world, this committee has very important work to do that needs to be accomplished, without delay. Unless we keep airline safety the top priority we risk digression and an increase in accidents that impact our ability to make progress on other important aspects of aviation such as airspace capacity and operational efficiencies.

First Officer Qualifications Have Improved Aviation Safety

The best and most important safety feature of any airline operation is a well-trained, fully qualified, highly experienced, and adequately rested professional flight crew. With a solid foundation of training and experience, pilots are essential in maintaining the safety of our system and ensuring that aviation safety continues to advance. Several regional airline accidents from 2004 to 2009 identified numerous training and qualification deficiencies that ultimately led to congressional action and regulatory changes that significantly improved airline safety. The last of these accidents occurred February 12, 2009, near Buffalo, N.Y. Fifty lives were lost—49 in the aircraft and one on the ground. This accident is now viewed as a "watershed event" for the airline industry and aviation safety by resulting in improvements in

pilot training, qualification, and flight experience requirements as well as implementation of science based flight, duty, and rest requirements.

The following year, Congress acted decisively and forcefully on the identified safety deficiencies by sending legislation to the president that addressed the documented shortcomings. P.L. 111-216, the "Airline Safety and Federal Aviation Administration Extension Act of 2010," was signed into law on August 1, 2010.

Following the establishment of the law, and based on industry recommendations, the FAA, citing 31 accidents over a nine-year period, issued regulations effective August 1, 2013 to establish minimum first officer training and qualification requirements.

These regulations require that all airline pilots flying under 14 Code of Federal Regulations (CFR) Part 121 must hold the air transport pilot (ATP) certificate. They also created the restricted ATP (R-ATP) certificate pathway, which could be obtained with fewer flight hours than the ATP, if the pilot applicant receives academic and flight training from the military or an accredited aviation college or university.

The new rules emphasize significantly greater focus on academics and instruction, areas of knowledge, and flight experience in various weather and operational situations. The rules also require a type rating in the aircraft to be flown for the airline if operated in FAR Part 121 service, among other numerous safety improvements such as increased experience in multi-engine aircraft. The FAA made a specific

mention of the importance of academic training when it published the final rule, and how the accredited academics along with ground and flight training was necessary to qualify for a reduction in hours.

As mentioned, the law also resulted in science-based flight, duty, and rest requirements for airlines. Unfortunately, these new flight and duty requirements were only applied to passenger airline operations. Cargo airline operations were carved out.

Based on the safety improvements with minimum pilot training and qualification requirements achieved since P.L. 111-216 became law, we strongly urge the committee to preserve these critically important safety regulations. *We urge the committee to reject any proposal to modify or change that weakens the current minimum first officer qualifications. These rules are working very well in all aspects, and lives have been saved.*

Safety regulations should not be driven by the economic decisions of airlines.

There are some people and organizations who want to fix business-related industry problems by weakening the First Officer Qualification (FOQ) rules. These organizations believe safety is something that can be negotiated. They believe that rolling back provisions in P.L. 111-216 is the best way to fix their business challenges by widening the employment pool. By that same logic, would these same groups be

lobbying to shorten the duration of medical school in an attempt to attract more doctors to work in rural areas?

It is somewhat ironic that some who called for the changes in P.L. 111-216 have since become critical of the new rules, arguing that the new First Officer Qualifications have created a pilot shortage. Small communities which have experienced changes to the levels of airline services are also citing a pilot shortage. However, in both cases, there is no reliable data to support these positions.

There are several business-related reasons that proponents cite for relaxing the safety rules. They say that the rules have negatively affected the industry in a number of ways.

For example, while some have pointed out that the rules have created a pilot shortage, the data says differently. There is an adequate supply of qualified pilots and a robust pipeline of pilots to meet the needs of commercial aviation. In 2016, the FAA issued more than 9,500 ATP certificates, which includes more than 2,100 R-ATP certificates. In 2016, our research revealed that the airlines hired somewhere between 3500-4000 pilots, which is considerably fewer than the number of pilots who were qualified to fly for the airlines that year.

Flight Training Costs Not Impacted by FOQ

The FOQ rules have not driven increases in flight training costs. The flight training a pilot is required to receive to obtain a commercial pilot certificate is the same today as it has been for decades. Once pilots achieve their commercial pilots certificate, they stop paying for their flight time. Instead, pilots obtain commercial flight experience through paid employment as flight instructors, corporate, cargo, or charter pilots. The hours and experience garnered in these entry-level commercial flight environments are critical to the successful creation of a well-trained, experienced, and fully qualified airline pilot.

Pilot Experience before Airline Flying is Critical

The length of time from when a pilot obtains their commercial pilots license to when they have accumulated the hours and flight experience necessary to qualify for the ATP or R-ATP certificate is measured in months, not years or decades. Pilots who graduate from an accredited, structured university that are qualified for the R-ATP pathway can currently expect to spend 12 months flying in entry level commercial operations before transitioning to an airline.

Because each airline conducts training differently, and because they use different terminology and require pilots to adapt to procedural philosophies that are most likely unique, there will be some adjustments needed by pilots. While regional airlines would like pilots to come pre-programmed from a flight training environment that minimizes the adjustments needed by pilots entering an airline's flight training

environment, the pilots are also bringing with them real-world experience that includes a variety of weather, terrain, and air traffic control environments.

It is important to note that airlines do NOT provide ANY training or provide pilots with aircraft to obtain experience in factors such as weather (e.g., thunderstorms, snow, tropical storms), terrain (e.g., high altitude, mountain flying), and high-density air traffic (e.g., New York City and Los Angeles metroplex). Today's flight simulation environment cannot adequately replicate these factors. Therefore, it is critical for pilots to obtain flight time and experience in commercial operations after they have obtained the commercial pilots license, but before being inserted into the Part 121 airline operating environment. The FAA wisely recognized that the combination of an accredited university, structured FAA approved flight training, and some commercial piloting experience in pre-airline commercial operations was the best and safest training pathway to fully address the shortcomings identified from fatal passenger airline accidents.

Pilot Supply Isn't Driving Airline Service Changes

The changes in airline services to any airport large or small, are driven by several variables including passenger demand, an airline's access to an appropriately sized aircraft, economic incentives, access to ground services and equipment. Like any other business, however, airlines must decide where they are able to profitably provide affordable air transportation services. Airlines change service levels to all airports on a regular basis. As just one example, last November, Southwest airlines

announced that it would end service to Flint, Michigan. But the company was clear about the true reason for the change in service: the airport was not a good business fit. The same issue that Southwest airlines admitted to in Flint, Michigan (see: http://www.mlive.com/news/flint/index.ssf/2017/11/southwest_airlines_pulls_plug.html) is an issue in other small communities as well.

Other considerations include proximity to larger airports with air travel that is less expensive due to the use of larger aircraft. Sometimes, airlines enhance the service to small communities by changing from a propeller aircraft to jet aircraft, which adds seats in almost all cases. By adding seats, the airline reduces the frequency of the flights but may actually provide more capacity than with propeller aircraft. ALPA is a strong proponent for ensuring that all Americans have access to passenger airline services, and when possible the services should be made available to the small communities across the nation. Lowering safety standards will not increase service to small communities it will simply make flying to those communities more dangerous. There are other rules and policies that can be changed to more fully support air travel from small communities.

Flight Training Enrollments Are Increasing, Not Decreasing

Several accredited universities with flight training programs have stated that enrollments of professional pilot students are significantly higher this year as compared to last year, and demand for future years remains strong. This is a strong indicator that the R-ATP pathway that is available to students who enroll at

accredited aviation colleges and universities is working. Pilots can and do complete a two- or four-year university degree program and accumulate 12-18 months of flying experience in entry-level commercial aviation employment before progressing to airline flying.

By calling for changes to safety rules as their number one solution to their business problem, these other interested parties are telling the traveling public and elected officials that they need to accept reduced levels of safety in pilot training and qualifications so that business problems can be fixed. They are saying that no other law, regulation, or policy change in all of the United States code, and associated regulations can solve their problem. Intentionally or otherwise, they are also telling the traveling public that they need to accept reduced levels of safety when flying to small communities. They are telling the public that we need to go back to the way it was in February 2009.

Pilot free market supply and demand will dictate if we continue to have enough pilots in the future, ALPA and the flying public will not accept a reduction in safety in an attempt to influence the pilot supply free market.

Those few regional cargo and passenger airlines that report a shortage of pilots typically offer lower salaries and benefits, poor work-life balance, and fewer opportunities for career progression than airlines that are not reporting such a shortage. Qualified pilots have many employment opportunities and some regional

airlines have realized that to attract qualified candidates, they have to be competitive in salary and benefits to attract pilots.

We urge the committee to seek to understand the issues that appear to be forcing the airlines and small community airport advocates to call for changes in safety rules, in order to fix a problem that is purely about economics. Travelers in the United States should not be required to sacrifice levels of safety to access airline travel from their home airports. But weakening first officer qualification rules attempt to do just that.

Safe Shipments of Hazardous Materials

ALPA has long advocated for improved transport requirements for hazardous materials. As witnessed in 2015 with hoverboards, and again last winter with the Samsung Galaxy Note 7, lithium batteries and other hazardous materials can create real safety threats in the absence of proper regulations. Mitigating the risk to aviation safety from hazardous materials requires a focus on two specific areas: improving hazardous materials regulations and eliminating shipments of undeclared hazardous materials.

The significant consumer demand for these high-density power sources has resulted in rapid expansion in lithium battery production, supply, and proliferation. Consequently, this hazard is increasing exponentially. While lithium batteries represent a significant technological improvement over older battery technology, their high energy density and flammability make these batteries more prone to

failure, resulting in fire and explosion. The lack of comprehensive hazardous materials regulations for the carriage of lithium batteries as cargo onboard commercial aircraft, both passenger and cargo, continues to pose risks to air transportation.

New standards implemented by the International Civil Aviation Organization (ICAO) on April 1, 2016, made significant improvements to provisions under which lithium batteries are shipped as cargo by air around the globe. And while the Department of Transportation has begun the process of harmonizing these into the U.S. regulations, no proposed or final rule has been issued after 22 months. We were very pleased to see language included in H.R. 2997 to require DOT to harmonize its regulations with the new ICAO standards.

While the ICAO limitations are a good first step, they do not go far enough in addressing the safety risk created by lithium batteries. Work must continue to develop and mandate performance-based packaging standards that will prevent and/or contain a lithium battery fire. These standards must also address the threat from external fires.

In the FAA Modernization and Reform Act of 2012 (P.L. 112-95), Section 828, Congress directed the DOT not to regulate lithium batteries carried as cargo on aircraft stricter than the ICAO standards unless a fire onboard an aircraft could be proven to have substantially contributed to a fire involving lithium batteries in the

cargo hold. There have now been three such accidents (UPS 1307, UPS 6, and Asiana 991), two of which were fatal to the pilots on board and all three of which destroyed the aircraft. The accident reports attribute lithium batteries as a large factor in all of these events.

The National Transportation Safety Board (NTSB), following the most recent accident involving Asiana Airlines Flight 991, issued a safety recommendation stating that it "believes that the circumstances and findings in the Asiana Flight 991 accident constitutes such credible evidence that demonstrates a deficiency in cargo-segregation requirements that would permit the HMR [hazardous materials regulations] to be changed to be more stringent than the current ICAO requirements."

ALPA agrees with the NTSB that the threshold set by legislation has been met and it is time to move forward on comprehensive regulations governing cargo shipments of lithium batteries.

Hazardous materials, comprised of liquids, flammables, and other materials, shipped as cargo without being identified by the shipper are considered undeclared hazardous materials. There are no official estimates of what percentage of parcel shipments contain undeclared hazardous materials; however, the FAA tracks incidents where hazardous materials shipments create safety hazards for various reasons, such as a leaking package or other type of external evidence that the package

is a safety concern. In 2015, the FAA received 1,129 reports of such events, and 564 of the incidents involved undeclared hazardous materials.

ALPA's research indicates that the biggest weakness in the shipment of hazardous materials by air is the reliance on an "honor system" approach by the airlines and regulators. Increased attention to and accurate data is needed to eliminate undeclared hazardous materials shipments by air.

FAA Leads the Way on Portable Device Safety in Checked Baggage

ALPA concerns about lithium battery fires in checked luggage spiked early in 2017 when security issues drove many passengers to store their large personal electronic devices in their checked baggage.

We were pleased to see that the FAA has taken the significant step at ICAO to propose a prohibition of installed lithium batteries in certain electronic equipment from checked baggage on passenger aircraft. ALPA fully supports this proposal, which was based on testing conducted by the FAA at the William J. Hughes Technical Center (the Technical Center), outside of Atlantic City, New Jersey. The FAA expertise and rigor applied to the testing, and proposal development is to be commended.

Safe Integration of Unmanned Aircraft Systems

With the rapidly growing use of Unmanned Aircraft Systems (UAS) for any number of applications and uses, the safety risks to airline operations needs to be monitored

very closely. We applaud this committee's commitment to ensure UAS safety, by holding a hearing at the end of last year on the topic, and by probing the need for a robust risk mitigation plan. Clearly, at some point in the future, UAS will be integrated into the national airspace system (NAS), interacting with other aircraft in a manner similar to "pilot on board" aircraft today.

However, it seems at times that the FAA is struggling to keep pace with the expansion of the UAS industry. We must not allow pressure to rapidly integrate UAS into the NAS without appropriate safeguards in place. This process must be focused on safety as the highest priority. Risk mitigation plans, which have yet to be fully developed, combined with consensus-based technology standards that will ensure interoperability with manned aircraft, must be in place before a UAS can occupy the same airspace as manned aircraft or operate in areas where it might inadvertently stray into airspace occupied by airliners. When UAS operate in the same airspace as airline aircraft, the pilots will need to be able to see them on cockpit displays, and air traffic controllers will also need to see them on their displays to safely separate air traffic. Further, the UAS must be equipped with active collision-avoidance technology. We will oppose any integration that does not include collision avoidance systems that are interoperable with airline collision avoidance systems.

If a UAS operator does not intend to fly in the same airspace as airliners, then limitations that ensure that the UAS stays out of the airspace must be programed into the UAS in a way that cannot be overridden.

FAA Authority to Fully Regulate all UAS

The FAA has established 14 CFR Part 107, which are rules for small UAS (sUAS). The regulatory framework created is limited to commercial operations only. This is because Congress prohibited the FAA from promulgating any new rules on "hobbyists" operators in Section 336 of P.L. 112-95 of the FAA Modernization and Reform Act of 2012. This law was cited in an appeals court decision in early 2017 that struck down the FAA regulatory requirement that requires all operators of sUAS that weigh more than .55 pounds to register with the FAA. Fortunately, this committee's bill - HR-2997-- includes a provision that would legislate the FAA's authority to require registration of all sUAS above the minimum weight threshold of 0.55 pounds. Additionally, Congress saw fit to include this same registration requirement in the annual National Defense Authorization Act signed into law in December 2017 and ALPA was fully supportive of this effort.

The prohibition against the FAA's authority to regulate hobbyist sUAS also creates an interesting situation where commercial sUAS pilots who are certified by the FAA have more operational restrictions on them than the hobbyist operators. While commercial sUAS operators must obtain explicit approval from air traffic control to operate in the vicinity of an airport with an operating control tower, model/hobby sUAS operators merely need to advise ATC. This seems somewhat counter-intuitive from a safety perspective. The operators who are not trained, and who have not been

issued a certificate from the FAA, should have more safety restrictions than commercial operators.

As has been widely reported, a drone recently collided with a U.S. Army helicopter one mile east of Midland Beach in Staten Island, New York. From the investigation, we know that a Temporary Flight Restriction (TFR) was in effect for the area of the flight, the UAS was not equipped with any type of identification or tracking technology. The National Transportation Safety Board used pieces of the sUAS that were found lodged in the aircraft, and using the information from these pieces, the hobbyist pilot of the sUAS was identified and located. The individual operating the sUAS routinely operated his hobby aircraft in the vicinity of the collision site, which was beyond his visual line of sight. After losing control of the aircraft, and because it failed to return to his position, he indicated that he simply believed his aircraft had "gone down" and he was unaware that it had been involved in a mid-air collision.

In another recently reported event, a drone appears to have captured video of an ALPA-crewed airline aircraft flying underneath the drone while on approach to landing. In light these situations, we have reached out to all members of Congress with the support of other organizations, calling for it to give the FAA the ability to fully regulate all UAS operations.

And we say it again today, ALPA strongly urges the committee to remove the current restrictions that Congress has placed on the FAA's ability to fully regulate all UAS,

including hobby sUAS. We are not calling on Congress to apply overly restrictive and burdensome regulations on the recreational segment of the sUAS industry. However, we are calling on Congress to allow the FAA to use its regulatory authority to address the known and constantly increasing risk to airline safety.

sUAS Identification and Tracking Technologies are Needed

ALPA also encourages Congress to work closely with the FAA to implement mandatory identification and tracking capabilities as quickly as possible. An aviation rulemaking committee (ARC) recently concluded its work in this very important area, and provided the FAA with recommendations that should result in a regulatory framework that increases safety and addresses security concerns as well. ALPA participated on the ARC, and I can tell you that a very diverse group of participants worked very well together to achieve excellent results.

If an identification and tracking system had been in place prior to the October collision with the Army helicopter, much more information would have been immediately available to accident investigators and law enforcement. Such a system would likely have prevented the collision in the first place, because law enforcement may have observed the sUAS operating on a previous flight, and proactively contacted the hobbyist about the illegal use of the aircraft. Until there is a way for law enforcement to identify and track down the sUAS pilots, there is very little incentive for non-conformist hobby operator to do so safely.

Strengthening the Voluntary Safety Reporting Programs

Voluntary safety reporting programs such as the Aviation Safety Action Program (ASAP) and Flight Operations Quality Assurance (FOQA) are important, collaborative tools that enhance aviation safety through the analysis of voluntarily reported safety events and discrepancies that lead to the prevention of accidents and incidents. The purpose of ASAP and FOQA is to encourage and use voluntarily reported safety information provided by frontline employees and airlines, respectively, to identify safety risks. Without these valuable safety reports, unidentified risks go unmitigated and remain within the system.

For example, more than a decade ago the implementation of stabilized approach technology and procedures became a top safety priority upon discovering the frequency of non-stabilized approaches being reported by pilots. More recently, data sources have been combined to identify potential risks that are initially identified through the voluntary safety programs. Ground radar data, historical weather information, and other data sources were used to identify instances when aircraft traffic and terrain warning systems were repeatedly alerting to false alarms. These voluntary safety programs triggered these studies, which ultimately led to the discovery that improvements to airspace and procedures design would reduce the false alarms. These examples prove that the underlying voluntary safety program reporting by the operators is the best source to identify potential risk areas and to investigate and ultimately mitigate these risks.

Automatic Acceptance

We can improve and increase the safety benefit of ASAP and voluntarily submitted aviation safety information by automatic acceptance of ASAP reports. Several programs already have automatic acceptance protocols built in (e.g., American and Delta Air Lines). However, where ASAP reports are not automatically accepted, the safety benefit is delayed, sometimes by weeks or longer, waiting for an Event Review Committee (ERC) to meet, review, and accept these reports. Under an automatic-acceptance scenario, the safety benefit of the information would be realized immediately. However, a report could be excluded when the ERC convenes and it is determined to meet established exclusionary criteria. The automatic acceptance model works and should be universal to ASAP. ALPA is pleased that HR 2997 includes this very important provision.

Addressing Cargo Safety

Many of the safety and security layers working to protect our passenger airline industry are absent from all-cargo operations. Cargo airlines fly the same aircraft, takeoff and land from the same airports, utilize the same airspace, and fly over the same cities as passenger aircraft. From a safety and security standpoint, there is every reason to hold all-cargo operations to the same standards as passenger operations. All-cargo airline operations currently experience an accident rate that is seven times higher than passenger airline operations worldwide.

While many of the same regulations are used for both commercial passenger and all-cargo airlines, there are lesser requirements placed on all-cargo operations in several very important areas, which results in unnecessary safety risk.

One example of this safety double standard between cargo and passenger operations is flight crew flight, duty, and rest regulations. While new flight- and duty-time regulations for passenger operations were issued in 2011 and implemented in 2014, those rules apply only to flight crew members at passenger airlines and do not include all-cargo pilots. The FAA's original rule included all pilots, passenger, and cargo operations, but the cargo sector was removed by the Office of Management and Budget due to a flawed cost-benefit methodology. We believe that science-based flight, duty, and rest regulations must be developed for flight crew members of all-cargo operations.

Another example of a safety gap is that all-cargo operations are exempted from Aircraft Rescue and Fire Fighting (ARFF) requirements contained in 14 CFR Part 139. This means that ARFF is not required to be staffed or even present at airports during operations of cargo aircraft.

Further, cargo aircraft carry some very hazardous cargo such as blood-borne pathogen, chemical, and even radioactive material. Not only should ARFF be staffed during cargo operations, but ARFF personnel must be trained for dealing with fires on cargo airliners. Measures need to be developed and implemented that will

properly prepare firefighters for dealing with a cargo aircraft fire. There is a lack of proper ARFF equipment needed to fight all-cargo aircraft fires at some airports, including nozzle tips designed for penetrating cargo airliner hulls, and a lack of funding, because the exemption of cargo from 14 CFR Part 139 requirements interferes with fire departments' ability to get the money they need for staffing, equipment, training, and developing strategy for cargo-specific events.

ALPA has maintained a strong stance that all-cargo operations must have the same level of safety as passenger airlines. The facts however, speak for themselves. The United States fatal accident rate of all-cargo operations is significantly higher than that of passengers. In the same period that there have been no fatal passenger accidents on U.S. airlines, there have been several fatal cargo accidents. These facts are the reason why ALPA has invested our resources in the efforts of the Commercial Aviation Safety Team (CAST) and their technical groups, to identify the differences between passenger and all-cargo that need to be addressed. We appreciate the Committee's support of the work being done by CAST and the Aviation Safety Information Analysis and Sharing (ASIAS) activity. We know that with the support of Congress, we will achieve the safety goals that all are striving to achieve.

ALPA and Aviation Safety

We appreciate the committee's invitation to offer our insights and perspectives on these important safety issues. More importantly, we appreciate the leadership that is being exerted by the committee to advance these high-priority safety issues. The

airline industry is best positioned to fully meet the needs of all passengers and shippers when safety levels remain at their current levels. It is in our collective best interest as legislative leaders, labor organizations, companies, and regulators, to ensure the foundation of safety is solid, and continues to lead the rest of the world. I look forward to working these issues with you in the coming months as we strive to make meaningful safety improvements to aviation in the work we are doing together.