

The Association.



THE TWU-IAM ASSOCIATION

July 15, 2019

Ali Bahrami
Associate Administrator for Air Safety
US Department of Transportation
Federal Aviation Administration
800 Independence Avenue, S.W.
Washington, DC 20591
ali.bahrami@faa.gov

Re: American Airlines

Dear Mr. Bahrami:

This is to advise you of a court order issued July 10, 2019 which implicates safety concerns you have recently raised with American Airlines, the International Association of Machinists and Aerospace Workers, AFL-CIO (IAM), and the Transport Workers Union of America (TWU).

On June 24, 2019, you wrote to express the FAA's safety concerns in light of the pending litigation between American and the Unions in the Northern District of Texas. In your letter, you expressed the FAA's "concern about the ongoing effectiveness of the airline's safety management system," and that "Safety is a shared responsibility of American and Union members that demands a collaborative culture, irrespective of any ongoing controversy between the organizations." You also urged American and the Unions to "strive to ensure that any judicial order in the litigation does not constrain appropriate safety activities."

On July 10, 2019, American Airlines requested, and the federal court shortly thereafter entered, an Order which requires the Unions to "take all reasonable actions, including but not limited to communications to their members, to ensure that their members working at American's line maintenance stations, within seven days of [July 10] ..., achieve approximately, in the aggregate, on a 7-day moving average basis, overnight productivity levels equal to the aggregate ... overnight productivity levels achieved in the summer of 2018 of 77.5%." A copy of that Order is attached; the quoted language is on page 5.

While the Unions intend to ask the Court to modify its Order to address this particular issue, we felt it necessary to also alert the FAA to this provision in light of your recent communication, and to request that you assign inspectors to all maintenance locations sufficient to ensure that the use of targeted productivity levels does not compromise the public safety or compliance with FAR regulations.

If we can provide any additional information which might assist your review of this issue, please do not hesitate to contact me.

Sincerely,

Alex Garcia
International Executive Vice President, TWU
Director, TWU/IAM Associations

Sito J. Pantoja
General Vice President, IAM
Vice Director, TWU/IAM Association