

**WRITTEN STATEMENT OF  
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**BEFORE THE COMMITTEE ON TRANSPORTATION AND INFRASTRUCTURE  
SUBCOMMITTEE ON AVIATION**

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*“FAA Reauthorization Act of 2024: Stakeholder Perspectives on Implementation”*

**December 11, 2024**

On behalf of the Transportation Trades Department, AFL-CIO (TTD), and our 37 affiliated unions representing hundreds of thousands of aviation professionals, I thank Chairman Graves and Ranking Member Cohen for inviting me to testify on the implementation of the Federal Aviation Administration (FAA) Reauthorization Act of 2024.

As the largest transportation labor federation in the country, representing hundreds of thousands of aviation workers, we are invested in ensuring a robust, modern, and successful FAA. We are confident that proper implementation of the bipartisan 2024 FAA reauthorization legislation will strengthen aviation safety standards, sustainably grow our skilled workforce, and enhance the quality of service that travelers deserve.

The aviation workers represented by TTD-affiliated unions maintain the highest safety standards in global aviation through their dedication and expertise. Swift and precise implementation of this legislation will strengthen their ability to meet evolving challenges by providing essential tools, resources, and protections that directly support their safety-critical work. These members have witnessed firsthand how underinvestment in critical infrastructure, inadequate FAA staffing levels, and outdated safety protocols directly compromise both worker and public safety. They understand firsthand the risks these issues pose to the safety and efficiency of the aviation system. Expedient implementation of this legislation will not only safeguard the well-being of aviation workers but also ensure that the United States continues to set the global standard for aviation safety and reliability. Empowering these dedicated professionals is essential to maintaining public trust and advancing the future of air travel.

This FAA bill enhances safety standards, works to ensure sustainable growth of the federal aviation workforce, facilitates improvements to infrastructure and service, rejects any policy changes to pilot training, qualification and retirement age, and ensures the current, correctly tailored balance regarding the Airline Deregulation Act’s focus on consumer-facing matters. We were proud to work closely with Congress on a pro-worker, pro-safety bill that will positively impact the aviation

industry for decades to come. TTD and our affiliate unions were glad to see a number of critical priorities codified in this legislation, including provisions to address the shortage of air traffic controllers, protections for airline employees against assaults, and efforts to close existing safety gaps. Now, it is critical that the provisions enumerated below are implemented quickly and accurately.

Delaying implementation of these safety-critical provisions creates dangerous regulatory gaps that directly impact frontline workers while increasing the risk of preventable accidents and disruptions. This inaction puts both safety and economic stability at risk, threatening the foundation of an industry that is essential to our national transportation network and economic prosperity.

### **Global Aviation Issues**

One of the most glaring and troubling loopholes in the regulation of aircraft maintenance is that workers at domestic facilities must undergo extensive drug and alcohol testing while foreign mechanics working on U.S. aircraft are exempt from this requirement. To address this core safety issue, the 2012 FAA Reauthorization bill directed the FAA, within one year, to issue a proposed rule requiring all repair station employees responsible for safety-sensitive maintenance on U.S. aircraft to be subject to an alcohol and controlled substance testing program. While the FAA issued an Advance Notice of Proposed Rulemaking (ANPRM) on drug and alcohol testing in 2014, no further action occurred until last year, a decade later. While the required rule is expected to be finalized by the end of this year, decade-long delays in implementing congressionally-mandated safety measures represent an unacceptable risk to aviation safety and workers' well-being.

Similarly, this legislation mandates critical safety improvements for global aircraft maintenance, requiring annual unannounced inspections at foreign repair stations and establishing minimum qualifications for mechanics working on United States-registered aircraft. These standards address longstanding disparities between domestic and foreign maintenance requirements and ensure the safety of our aircraft, regardless of where the maintenance occurs. Requiring annual unannounced inspections of foreign repair stations helps ensure these facilities adhere to the same rigorous safety standards as domestic repair stations, preventing lapses in oversight. Establishing minimum qualifications for mechanics and other workers ensures that only highly trained professionals handle critical maintenance tasks, safeguarding the integrity of U.S. aviation operations.

The 2024 FAA Reauthorization Act imposes critical limits on foreign interchange agreements to ensure competitive fairness in the U.S. airline industry. Currently, foreign interchanges can be of indefinite duration according to the FAA. In the past, the duration of interchange agreements would last a few days, but now can last for a year or more. As a result for example, a Canadian-registered carrier is taking advantage of the absence of hard limits for interchange agreements. The FAA must remedy this by promulgating a rule establishing limitations on interchange agreements, minimum breaks between renewals, and a limit for no more than one agreement between airlines.

## **Assault Prevention**

Airline workers, including flight attendants, gate agents and other personnel, face an alarming increase in workplace assaults and have reported unprecedented levels of verbal abuse, threats, and physical violence since the COVID-19 pandemic. TTD and our affiliate unions were encouraged to see Congress take meaningful steps to address this situation through a number of provisions included in the 2024 FAA Reauthorization Act.

Key measures aimed at mitigating this unacceptable reality include setting minimum standards for self-defense training for flight attendants and pilots, empowering them to protect themselves and de-escalate conflicts in high-stress situations. Additionally, the requirement for passenger-carrying air carriers to submit Employee Assault Prevention and Response Plans to the FAA will ensure that airlines implement proactive and comprehensive strategies to address and mitigate these incidents. Importantly, the legislation clarifies that federal protections against interference with security personnel extend to airline employees performing critical ground functions such as ticketing, check-in, baggage claim, and boarding.

These provisions mark a significant step forward in safeguarding aviation workers, reinforcing their vital role in the aviation system, while also ensuring a safer environment for both employees and passengers.

## **Staffing**

Air traffic controllers keep our skies safe as they efficiently move thousands of aircraft every day throughout the National Airspace System (NAS). Their professional standards are rigorous: new hires undergo extensive training for at least 18 to 36 months depending on their facility assignment. Controllers worked throughout the COVID-19 pandemic, and without their ongoing efforts, air travel could not have rebounded as quickly as we have seen in recent months.

A decade of insufficient hiring has created a critical staffing crisis among certified professional controllers (CPCs), leaving our air traffic control workforce severely strained. Today's workforce of CPCs has declined by 1,000 positions compared to 10 years ago, forcing many controllers to work six-day, 10-hour weeks just to keep our airspace safe. There are 1,000 fewer CPCs today than 10 years ago, and over 10 percent of the CPC workforce is eligible to retire. This has led to staffing shortages at certain facilities and some controllers working six days per week.

Importantly, this legislation directs the FAA to set as the minimum hiring target for new air traffic controllers for each of fiscal years 2024 through 2028 the maximum number of individuals trained at the FAA Air Traffic Control Academy. The bill also requires the FAA to revise its staffing standards to adopt the best staffing model identified by the Transportation Research Board (TRB) and allows the FAA to implement any necessary TRB recommendations. Similarly, the bill directs the FAA to conduct a comprehensive review and, as necessary, revise the FAA's staffing model for aviation safety inspectors. The FAA is further authorized to address staffing challenges revealed by this analysis.

In addition to air traffic controllers, airport service workers are another essential component of the aviation system. Airport service workers, from baggage handlers to wheelchair agents to cabin cleaners, form the backbone of daily aviation operations, yet their critical contributions remain undervalued and under-protected. This bill requires the Government Accountability Office (GAO) to complete a comprehensive review of the domestic airport service workforce and examine the role and importance of this workforce to the aviation economy. Such a review can provide valuable insights into the working conditions, wages, training, and career opportunities of airport service workers, many of whom operate in demanding environments with minimal job security. Highlighting their contributions and needs can pave the way for improved labor standards, fair compensation, and better working conditions. Moreover, it reinforces the importance of treating all segments of the aviation workforce as integral to the industry's success, ensuring these workers are no longer invisible but recognized and valued for their essential contributions.

### **Working Conditions**

The safety and reliability of our aviation system depend entirely on the skilled professionals who operate it, from the ramp to the radar room. These aviation professionals ensure the safety and reliability of American air travel through their dedication, training, and expertise. Ensuring their working conditions match their critical responsibilities, that they are fair, safe, and supportive benefits both the workforce and the traveling public. The 2024 FAA Reauthorization Act specifies a number of ways in which working conditions for employees across the industry can and should be improved.

For example, airport ramp workers face significant hazards such as jet blasts, engine ingestion, tire explosions, and other vehicular accidents, often with limited protection. By initiating a comprehensive review and providing targeted training, as required by this bill, the FAA will address critical safety gaps and empower workers with the knowledge and tools needed to prevent accidents. The inclusion of hazard training for all relevant employees ensures a unified, well-informed workforce that can effectively respond to potential dangers.

The legislation also addresses two critical worker health concerns: cabin air safety and radiation exposure. It directs the FAA to develop a standardized system for flight attendants, pilots, and aircraft maintenance technicians of air carriers to voluntarily report fume and smoke events promulgating a rule, where appropriate, on training, standardized reporting, and investigative procedure for oil and hydraulic events, and the installation of AQ monitoring equipment.

Additionally, the bill directs the DOT to enter into an agreement with the National Academies to conduct a study on radiation exposure to crewmembers onboard various aircraft types operated under Part 121.

Finally, the bill stipulates that the FAA must issue, at a minimum, guidance for lactation standards and rights for flight attendants and pilots to pump safely during flight. This provision is a meaningful step forward for working parents as it will facilitate balance between professional

responsibilities and caregiving needs, promote better retention and job satisfaction, and set a precedent for workplace rights and support.

### **Safety Provisions**

While safety underlies every provision of the 2024 FAA Reauthorization Act, several critical safety measures demand immediate implementation attention.

In the FAA Reauthorization Act of 2018, Congress passed a statute requiring, at a minimum, the FAA to issue a rule that all new aircraft for delivery to passenger air carriers have Installed Physical Secondary Barriers (IPSB) within one year. However, no meaningful action was taken to implement the rule until nearly five years after enacting the Saracini Aviation Safety Act of 2018 (i.e., Section 336 of P.L 115-254). Finally, in June 2023, the FAA issued a long-awaited final rule to mandate the installation of secondary barriers on all newly manufactured aircraft within two years. Following the passage of the 2024 FAA Reauthorization Act, FAA should not only implement the Aviation Rulemaking Committee (ARC) for secondary flight deck doors but also mandate through a final rule, secondary barriers on all flight deck doors not covered by the 2018 FAA Bill and attendant regulatory mandate. This would ensure all aircraft, including those that require a retrofit, have secondary flight deck barriers for passenger aircraft under FAR Part 121.

The 2024 reauthorization also makes improvements in tackling long-standing impediments for addressing mental health for pilots and controllers. The bill sets up a working group to review the FAA's medical processes for certification of pilots, the special issuance process, and mental health and medication protocol, with the intent to make recommendations for reforms. Section 411 includes requirements for the task group to monitor and evaluate implementation of the consensus Mental Health and Aviation Rulemaking Committee. While we are pleased with the Committee's work, we believe the FAA must do more to implement the ARC recommendations. As for implementation, we have major concerns that the FAA misinterpreting Section 801 of the reauthorization bill to significantly alter the deferral process for pilot medical certificates that require additional information for an FAA decision. This week the Office of Aerospace Medicine announced they intend to deny any applicant requiring additional information for certification, invalidating their medical and grounding pilots unnecessarily. These denials will

have a chilling effect and introduce unintended consequences for those already under an initial denial. We believe this interpretation is incorrect, inconstant with the spirit and legislative history of the Act that was focused on accident and incident investigations and requires a stay of implementation and wholesale reinterpretation.

The bill also addresses modernization and improvements to aircraft evacuation by requiring the FAA to conduct a study on improvements to the safety and efficiency of evacuation standards for manufacturers and carriers of transport category airplanes, among many other important provisions.

## **Conclusion**

From its very outset, the history of aviation safety has been written in hard-earned lessons shaped by a sobering reality: it can take a tragedy to reveal an unknown engineering flaw or a systemic vulnerability in established protocols. But it is also a tragedy when well-understood solutions to well-documented safety challenges – like mandating flight deck barriers or greater foreign repair station oversight – languish for decades in some cases after Congress required them. It is workers, travelers onboard flights, and the public on the ground below them who risk paying the true cost of federal inaction. Delayed action like those discussed in my testimony are unacceptable to both the professionals who make up our aviation workforce and the traveling public they serve. When a regulatory directive mandating FAA action within 12 to 18 months stretches into a 12- to 18-year implementation timeline, it should be equally unacceptable to each of you.

The 2024 FAA Reauthorization Act provides tools to address a number of risks that impact the lives of workers in this industry, but tools only matter if they're used. For the ramp worker facing jet blast hazards, for the airline crew managing cabin air quality concerns, for every aviation professional who ensures our system runs safely and smoothly—implementation must happen now. The workers our federation represents have always set the global standard for aviation excellence. It's time for the FAA to meet that standard with swift, decisive action to protect the workers who keep America flying.