



April 13, 2016

Senate Majority Leader Mitch McConnell
S-230 Capitol Building
Washington, DC 20510

Senate Minority Leader Harry Reid
S-221 Capitol Building
Washington, DC 20510

Senator John Thune, Chairman
Senate Commerce, Science, and
Transportation Committee
511 Dirksen Senate Office Building
Washington, DC 20510

Senator Bill Nelson, Ranking Member
Senate Commerce, Science, and
Transportation Committee
716 Hart Senate Office Building
Washington, DC 20510

Dear Majority Leader McConnell, Minority Leader Reid, Chairman Thune, and Ranking Member Nelson:

The letter dated April 11th, 2016 from the Chief Pilots of all-cargo airlines was a misleading attempt to establish a new set of facts about pilot fatigue. Fatigue rules are not, as these pilots claim, “clearly designed for passenger airline operations.”

On the contrary, the FAA did not design these rules for one type of pilot; the FAA’s original NPRM states that “The FAA has decided against proposing special rules for all-cargo operations because there are no physiological differences between pilots who fly cargo planes and pilots who fly passenger planes.”

The court case cited in the letter was procedural; it dealt with whether the FAA had the authority to apply a cost benefit analysis (CBA) to the rule. At the end of the day, in 2010, Congress told the DOT/FAA to write rules that address pilot fatigue (without any distinction between passenger and cargo).

Whether pilots are in the air or on the ground waiting to have their aircraft loaded, they are on the job. The difference in in-air time between passenger and cargo does not mean a difference in overall duty time. Science tells us that, although the nature of their operations is different, fatigue does not discriminate between the types of pilots.

Mark Rosekind, the NTSB's fatigue expert, testified to Congress that "There is no physiological difference between cargo and commercial pilots." It wasn't the FAA—or aviation safety experts, or science—that originally made the distinction between cargo and commercial pilots; it was only after the Office of Information and Regulatory Affairs (OIRA) caved to special interest lobbying that we were given two different levels of safety for all-cargo and passenger airlines in the United States.

That's why we are asking for the Senate to pass Boxer amendment #3489 to restore one level of safety to the skies.

Thank you for your consideration and time on this crucial aviation issue.

Respectfully,



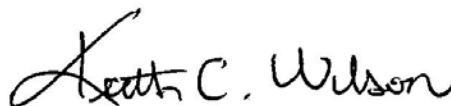
Captain Mike Karn, President
Coalition of Airline Pilots Associations



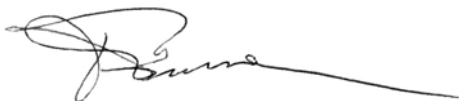
Captain Tim Canoll, President
Airline Pilots Association, International



Captain Robert Travis, President
Independent Pilots Association



Captain Keith Wilson, President
Allied Pilots Association



Captain David Bourne, Director
Airline Division
International Brotherhood of Teamsters



Captain Dan Wells, President
Teamsters Local 1224



Captain Chuck Dyer, Chairman
ALPA FedEx Master Executive Council



Captain Jim Clark, President
Teamsters Local 357