



January 31, 2018

Mr. James Owens  
Deputy General Counsel  
Department of Transportation  
1200 New Jersey Avenue, SE  
Washington, DC 20003

Dear Mr. Owens:

The purpose of this letter is to ask that you accelerate the Department of Transportation's (DOT) review of Airline for America's (A4A) regulatory reform request by amending the current rule and to revise DOT's service animal guidance to reflect air carrier duties to protect the health and safety of passengers.

During the past several years, but in particular during the recent holidays, airlines have experienced a surge in passengers bringing animals onboard that haven't been appropriately trained as service animals. This has resulted in our crewmembers and passengers being bitten and subjected to other offensive and injurious behavior. Our air carriers are responsible for the safety of our passengers and crew and make it our top priority. We need to ensure that airplane aisles and exits are clear in case of the need for an emergency evacuation, prevent exposure to dangerous animals that may injure other passengers, crew, or other animals or otherwise jeopardize the health and safety of everyone. It's also incumbent on us to act in a manner ensuring that the rights of passengers with legitimate psychiatric or physical needs to fly with their trained service animals are not impinged by others who may be abusing the current rules.

A4A has worked closely with passengers with disabilities in an attempt to find consensus on these important issues. We negotiated for six months in 2016 as part of DOT's negotiated rulemaking on issues important to the disabled and were successful on several key issues, but not the service animal issues. We met with DOT staff in April 2017 to reiterate our concerns and possible solutions and have continued to use the Disabled Passenger Working Group to collaborate on service animal and other disability issues. We are committed to finding solutions.

DOT has an opportunity to revise service animal guidance that strikes the right balance between ensuring passengers with a disability are accommodated in air travel and protecting the health and safety of all passengers and crew, and we urge DOT to act expeditiously. Given the serious nature of recent animal service related incidents, we expect carriers will be taking the appropriate steps to ensure the safety and health of our passengers and crew. Revised guidance from DOT is an important part of the process of addressing these issues to ensure the traveling public and our crew understand these policies.

We look forward to discussing these issues with you in the near future.

Sincerely,

Sharon L. Pinkerton  
SVP Policy