



**National Air Carrier Association**  
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May 19, 2020

The Honorable Peter DeFazio  
Chairman, Committee on Transportation and Infrastructure  
U.S. House of Representatives  
2165 Rayburn House Office Building  
Washington, D.C. 20515-6256

Dear Chairman DeFazio:

Thank you for your May 14, 2020 letter expressing concerns regarding passenger safety on commercial aircraft with high load factors in light of the COVID-19 pandemic. On behalf of National Air Carrier Association (NACA) member carriers<sup>1</sup>, including ultra low-cost carriers (ULCCs) Allegiant Air, Frontier Airlines, Spirit Airlines, and Sun Country Airlines, I want to assure you that the safety of our passengers and crew members has and will continue to be our highest priority. We are extremely grateful to you and your staff for including the airline financial assistance programs in the Coronavirus Aid, Relief, and Economic Security (CARES) Act, which has helped protect thousands of jobs and the economic viability of our 18 member carriers, and look forward to working with you to implement our attached SAFETY principles to restore confidence in air travel and help contain the spread of COVID-19 in our airports and aircraft.

In the worst aviation economy in our nation's history, our members are making significant investments of their scarce resources in order to ensure the safest possible traveling experience for travelers. While our carriers strictly adhere to U.S. Centers for Disease Control and Prevention (CDC) guidance for airlines and airline crew pertaining to COVID-19, the concept of social distancing is nearly impossible to accomplish in tightly enclosed spaces such as aircraft cabins. With that in mind, NACA carriers have undertaken a robust, multi-layered approach to protect our passengers and crew members from check-in to deplaning and reduce the spread of COVID-19 in our aircraft and the hundreds of airports we serve. All of the NACA carriers have implemented most, if not all, of the following safety protocols:

- Requiring all crew members whose responsibilities necessitate close contact with passengers to wear facemasks and disposable medical-grade gloves, which are provided by our carriers.
- Providing facemasks and sanitizing wipes to passengers upon request.

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<sup>1</sup> NACA carriers include Air Transport International, Ameritech, Allegiant Air, Atlas Air, Everts Air Cargo, Frontier Airlines, Kalimantan Air, Lynden Air Cargo, Northern Air Cargo, Omni Air International, Spirit Airlines, Sun Country Airlines, Swift Air, USA Jet Airlines, Western Global Airlines, World Atlantic Airlines, and XTRA Airways.

- Equipping our modern Boeing and Airbus fleets with the latest hospital-grade particulate air (HEPA) filters, which remove 99.97 percent of airborne particles and recirculate the cabin air 20-30 times per hour, making the cabin air on our aircraft safer than most office buildings, grocery stores and other commercial spaces.
- Adhering to CDC guidelines by adding multiple layers of stringent cleaning and disinfecting of our aircraft, including the application of electrostatic disinfectants and anti-microbial sprays on every frequently touched surfaces - arm rests, seat belts, seat backs, headrests, tray tables, overhead controls, light buttons and door handles – killing viruses on contact and forming an anti-microbial coating or shield for 30 days.
- Deploying hand sanitizer and sanitizing wipes to airports for use at ticket counters, kiosks and gates, and on board aircraft for passengers and crew members.
- Proactively reviewing seat assignments to ensure as much personal space as possible between passengers, while ensuring that families who are traveling together can sit together.
- Initiating special boarding processes to reduce contact between passengers and crew members.
- Taking aircraft out of service when the CDC informs a carrier that a passenger who traveled on board exhibited COVID-19 symptoms, and putting the aircraft through a rigorous, CDC-approved decontamination process.
- Reducing or limiting beverage and snack service.
- Discontinuing onboard sorting of recycling items to reduce touching passenger-handled materials.
- Asking passengers and crew members who do not feel well or are concerned they may have COVID-19 to not fly until cleared to travel by a doctor or health professional.
- Conducting temperature checks for passengers at the gate until the Transportation Security Administration (TSA) conducts temperature checks outside the checkpoint.
- Deploying signage at airports encouraging social distancing between passengers and airline employees.
- Frequently communicating with airports at locations our airlines service to ensure appropriate cleaning for public spaces.
- Encouraging passengers to download mobile boarding passes prior to departure to limit the amount of physical contacts made with others.
- Continuing to work collaboratively with the CDC, DOT, the Departments of Homeland Security and Health and Human Services, as well as other aviation stakeholders, to prioritize the health, safety and well-being of our passengers and crew members.

Collectively, we believe these multi-layered protocols have dramatically reduced the risk of infection for our passengers and crew members. Even on flights with higher load factors, we believe that this multi-layer approach help restores confidence in air travel and contain the

spread of COVID-19.<sup>2</sup> Imposing arbitrary aircraft capacity restrictions without a significant increase in financial assistance from the federal government will provide limited, if any, safety benefits, force airlines to increase fares to compensate for a limited supply of seats, and likely result in several airline bankruptcies and the loss of tens of thousands of jobs – a scenario none of us wants to see.<sup>3</sup>

I would be happy to schedule a call with you and/or your staff with the leadership of our member carriers to discuss our COVID-19 safety initiatives in greater detail.

Very Respectfully,

A handwritten signature in blue ink, appearing to read "George Novak", with a stylized flourish at the end.

George Novak  
President and CEO  
National Air Carrier Association

Attachments

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<sup>2</sup> See attached NACA backgrounder entitled, "SAFETY: The Necessary Elements to Return Passengers to the Skies."

<sup>3</sup> See attached article from Joseph Allen, Assistant Professor of Exposure Assessment Science at Harvard T.H. Chan School of Public Health, "Airplanes Don't Make You Sick, Really," Washington Post, May 18, 2020.



## **SAFETY:** The Necessary Elements to Return Passengers to the Skies

**Safety:** Every effort must be taken to ensure that passengers, crews and those working on aircraft are protected from further exposure to the COVID-19 virus. We must work collaboratively with policymakers and aviation stakeholders to ensure the health and safety of every person in our aircraft, airports and other facilities. Robust health-related protocols in our nation’s airports and onboard commercial flights (e.g., use of personal protective equipment by crew and passengers and thorough cleaning and disinfection of the aircraft cabin in accordance with CDC guidelines) will help rebuild the confidence needed to resume a semblance of normal air travel, enabling families and individuals to return in large numbers to both business and pleasure destinations.

**Access:** Access to air travel – and the resulting consumer spending at hotels, restaurants, resorts and retail establishments – will be a critical element of the economic recovery.

**Flexibility:** Airlines must have the flexibility to shift aircraft and routes to meet demand as it ebbs and flows during the recovery. While air service should be guaranteed between as many points as possible, requiring multiple carriers to serve the same points where service greatly exceeds demand wastes fuel and resources, hindering economic recovery.

**Economic Viability:** Aviation stakeholders must work with the U.S. government to ensure that any new air travel policies related to COVID-19 cannot be so stringent that passengers can’t fly easily and affordably, and airlines can’t return to profitability and protect jobs. Overly burdensome screening or personal separation requirements, or policies that greatly restrict the number of passengers in an aircraft, will inhibit air travel to unsustainably low levels. In addition, a return to economic viability for airlines – and other vital sectors of the economy – cannot be achieved if new or higher taxes and fees are imposed on airline passengers to pay for COVID-19-related screening costs, unreasonable economic regulations are issued, or Congress fails to enact legislation protecting airlines and other impacted businesses from COVID-19-related lawsuits.

**Testing:** The federal government, with input from aviation stakeholders, must work quickly and methodically to deploy a measured approach to COVID-19 testing in airports that utilizes the latest technologies for both screening (e.g., non-contact temperature scanning and effective antibody testing) and credentialing (biometric or tamper-proof identification systems) for those safe to fly and interact with others.

**You:** The most critical element in returning to the skies is you. You might be the passenger, flight attendant, pilot or aircraft technician. Or, you could be the family member waiting at the airport for your family member, friend or colleague to arrive. You are the reason we fly. More than anything else, we care about your health and safety and helping you return to better days.

**NACA. We fly for you™**

## ***Airplanes don't make you sick. Really.***

**By Joseph Allen, May 18, 2020 at 9:00 a.m., Washington Post Online Edition**

**Joseph Allen is assistant professor of exposure assessment science at Harvard T.H. Chan School of Public Health**

You don't get sick on airplanes any more than anywhere else. Really, you don't. If you think this is preposterous or even dangerous to suggest during a pandemic, consider this fact: The ventilation system requirements for airplanes meet the levels recommended by the Centers for Disease Control and Prevention for use with covid-19 patients in airborne infection isolation rooms. Before we go any further, let's make one thing clear: Airplanes are certainly vectors of disease, efficiently transporting infectious people around countries and the globe. This is obviously critical in terms of outbreak control for covid-19.

But the fact that airplanes help spread disease across geographies does not mean that you are necessarily at risk during flight. There are fairly simple things you can do, if you do need to travel, to reduce the odds of getting sick.

Billions of people travel by plane every year, yet there have only been a handful of documented disease outbreaks attributable to airplanes in the past 40 years. If planes made you sick, we would expect to see millions of people sick every year attributable to flights. We haven't seen it because it's just not happening.

Consider one study that examined a passenger with tuberculosis on an airplane. It found that the median risk of infection to the other 169 passengers on the airplane was between 1 in 10,000 to 1 in a million. Wearing a mask, as some airlines now require, reduced the incidence of infection another 10-fold.

There's a reason the risks are low. The required aircraft systems do a really good job of controlling airborne bacteria and viruses. To get technical, airplanes deliver 10 to 12 air changes per hour. In a hospital isolation room, the minimum target is six air changes per hour for existing facilities and 12 air changes per hour for new. Airplanes also use the same air filter — a HEPA filter — recommended by the CDC for isolation rooms with recirculated air. Such filters capture 99.97 percent of airborne particles. What's more, airplanes are essentially designed to isolate airflow. Even if someone coughs on your flight without a mask, it is likely those virus particles will travel one or two rows, as evidence from the few outbreaks attributed to the airplane cabin shows.

Still, you might say, this only accounts for airborne transmission of covid-19. To guard against transmission via large droplets and contaminated surfaces, we do need to take some additional steps. Wearing a mask on planes should be mandated, and wiping down tables and arm rests with a disinfectant provides an additional layer of defense. By this point, you may be thinking, “But I know I get sick when I travel. This article goes against everything I have experienced firsthand.” The reality is that you are more at risk of getting sick when traveling, but it’s not the airplane that’s making you sick.

Every time you fly, you may also take a cab, bus or subway; stand in long lines in the airport; eat unhealthy foods; sit for extended durations; spend time in spaces with hundreds or thousands of other travelers; stay at a hotel or friend’s home; arrive in a different climate and change time zones, disrupting your sleep. All of these factors are known to affect your immune system. To be clear, I’m not suggesting we go about air travel as we did before covid-19. I’m just putting the risks of time spent on an airplane in context. It is prudent to take additional precautions during a pandemic.

In 2013, I was one of the lead authors of a report for the Transportation Research Board of the National Academies on infectious disease mitigation in airports and airplanes. Let me distill some of the recommendations from that report to those that are most applicable now and add a few new ones based on what we now know about covid-19.

For starters, airports should mandate mask wearing; increase ventilation rates; make bathrooms touchless; consider deploying upper-room germicidal UV fixtures in areas with high-occupant density; institute temperature screening; deploy hand-sanitizer stations; and, once passengers arrive at their gates, require that they stay in their designated area except for bathroom usage. Airlines should ensure gate-based ventilation is operating during boarding and disembarkation; carefully choreograph the loading of airplanes; mandate mask use; and provide meals and bottled water during boarding and discontinue in-flight meal and drink service.

Individuals have an important role to play, too. First, stay home and do not travel if sick. Comply with rules for mask wearing; wash hands before and after each step at the airport; keep the personal overhead ventilation on and pointed down; and maintain physical distancing to the extent possible. If the necessary precautions are taken, and people do their part and behave according to rules, there is a path back to air travel. But we should all consider this a privilege — one that can be revoked quickly if conditions change or if crowds do not act appropriately.