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## RAA Member Airline Comments With Regard to the Report of the National Task Force to Develop Model Contingency Plans to Deal With Lengthy Airline On-Board Ground Delays

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**RAA Member Airline Comments With Regard to the  
Report of the National Task Force to Develop Model Contingency Plans  
to Deal With Lengthy Airline On-Board Ground Delays**

The RAA and its member airlines appreciate having been provided the opportunity to participate in the development of this report of the National Task Force. The proper handling of lengthy on-board ground delays is an issue of great importance to each of our member airlines, both with regard to minimizing the impact of such delays on the passengers onboard the flights so delayed and also to minimizing the impact of such localized delays on passengers traveling elsewhere on our member airlines' service networks.

The RAA and a number of its member airlines actively participated in the efforts of this Task Force, embrace the spirit and the goals of its efforts, and support the model contingency plans presented in this Report.

**RAA Member Airlines Are Major Providers of Domestic Airline Service**

RAA member airlines serve more than 650 U.S. communities, and regional airlines provide the *only* scheduled airline service to over 70% of the domestic cities receiving scheduled passenger flights. Regional airlines operate nearly 50% of all domestic airline flights, with the majority of these flights operated seamlessly to the passenger in the colors of a major airline partner. Each RAA member airline maintains full operational control of its own flights in accordance with its FAA operating certificates, with their major airline partner developing the regional airline flight schedule and marketing and selling all of the seats on those flights. While most RAA member airline flights still operate between smaller airports and major airline hubs, recent trends in fuel cost and in the general economic environment are today leading to an increasing number of regional airline flights operating as replacements for flights previously provided on larger, less economical aircraft by a major airline partner. Regional airlines, operating the most modern, comfortable and economic turbojet and turbo-propeller aircraft available, are increasingly providing the reliable scheduled service airline access that is critical to the economic life of U.S communities, both large and small.

**The Task Force Report Documents a Necessary Compromise**

As made clear in the Task Force's initial undertakings, the myriad of weather and operational realities historically leading to extended delay situations are unlikely to ever be totally eliminated. As also made clear in the Task Force's undertakings, RAA member airlines and their major airline partners have long been proactive both individually and collectively in developing and putting into place plans and resources to better respond to such situations when they do occur. While there is clearly more to be done in this regard and best practices to be shared, the major and regional airlines have not been idle. That being said, by bringing the human elements of extended on-board delay situations more sharply into focus, the Task Force's discussions and deliberations have added significant value to the further development of contingency plans for such situations. The Task Force has importantly moved the discussion of contingency planning from traditionally operations-centric approaches to ones more supportive of the humanistic needs of the disrupted passengers.

The Task Force Report of necessity reflects a compromise position balancing a focus on the operational actions necessary to return flight schedules to "normal" as quickly as possible and recognition of the humanistic considerations impacting on the particular passengers in the heat of the disruption. Operational planning and careful action is necessary if airlines suffering

service disruptions are to meet their service obligations to their passengers, both those passengers already in travel elsewhere on that airline's service network and passengers expecting to board a later flight, but planning for and acting on the human needs of the passengers in the instant disruption is at least equally and often more critical. While there remain differences of opinion among the Task Force members as to where between these two considerations "the proper middle" lies, and quite probably as to whether or not "the proper middle" is constant or varies based on the particulars of each event, the one place where the Task Force members were united was in their commitment that safety could not and would not be compromised.

### **RAA Member Airlines and Major Airlines Must Coordinate Their Response Plans**

Contingency plans for lengthy airline onboard delays must be reflective of the network nature of the U.S. domestic airline system – the issues involved in the lengthy airline delay situations that are the subject of this National Task Force are not simply one-airport or one-airline issues. Since major airline partners develop their regional airline partners' operating schedules, and since the passengers carried on those schedules contract directly with the major airline by purchasing their tickets from that major airline and not from the regional, regional airline responses in lengthy delay situations must be extensively coordinated with those of their major airline partners.

This high degree of coordination is further made necessary by the fact that most regional airline flights are serviced on the ground by major airline ground staffs or by handling companies working under contract to a major airline partner. At major hub airports, regional airline flights compete with their major airline partner's flights for the resources that may be available to deal with delay situations. Gates, ramp space, ground equipment and manpower resources all must be effectively allocated among competing delayed aircraft and their passengers. While regional airline flights generally will have less competition for available resources at non-hub airports, such airports generally have fewer available resources in the first place. Coordinated planning between regional airlines and their major airline partners is critical to the successful handling of diversions and other schedule disruptions at both hub and non-hub airports.

### **Coordination of Airline, Airports and Government Agency Contingency Plans**

Task Force presentations and discussions underlined the reality that the handling of lengthy on-board ground delays is not an airlines-only responsibility. Airport and government agency planning and resources clearly need to be a part of any effective contingency plan. Since most lengthy on-board ground delays are caused either by weather events or by other ATC-related situations, the FAA has a significant role, initially in preventing, as best a possible, such delays from occurring in the first case and latterly in helping to extract aircraft and passengers from such delays when they do unfortunately occur. The Transportation Security Administration (TSA) and Customs and Border Protection (CBP) and their staffing and secure zone requirements can also have a major impact on how passengers in a delay or diversion situation can be handled. The RAA member airlines offer the following brief comments regarding these areas:

- Airport Considerations – As discussed above, regional airlines very often have little staffing or management presence at the airports that they serve. Regional airline flights often arrive at a gate contracted by a major airline partner and receive ground servicing from major airline staff or contracted ground personnel. Regional airline passengers often check in for their flight at major airline staffed or contracted ticket counters. In many cases, the only regional airline employees involved in the arrival/departure of a

regional airline flight at an airport are the operating crew members. Consideration of these regional airline realities is important when airport contingency planning teams are being assembled. Airports may need to make special arrangements to ensure that regional airline issues and concerns are raised in the development of their local plans and that regional airline flights are not disadvantaged when it comes to allocating scarce airport resources by the lack of company presence at the airport during planning exercises or in a delay or diversion situation.

- FAA Considerations –Task Force discussions many times raised the importance of there being timely and reliable information readily available to the airlines, airports and passengers with which to prepare for or plan recovery from extended delay or diversion situations. The FAA ATC system needs to play a critical role in the provision of such information and in its reliability, but is often found wanting on both counts. Unfortunately, the current domestic ATC system does not incorporate the technology necessary to do the job that is today required of it, and it is the airlines and, ultimately, their passengers who are paying the price. The FAA and Congress need to move aggressively forward with long-term funding proposals and approvals for the NextGen air traffic control system. Only when that system is in place can we hope to move toward prevention of the kinds of delays that the Task Force was chartered to study and not have to remain so focused on remediation strategies.
- TSA /CBP Considerations – RAA member airlines raised issues before the Task Force regarding the part that TSA security rules and zones have heretofore played regarding the deplaning of passengers in diversion situations, particularly at the hundreds of smaller airports served by RAA member airlines. On a significant number of occasions, RAA member airlines have found it necessary, for weather or a simple mechanical issue, to divert flights to airports outside of the times that TSA staffing was available, with the result that the passengers and crews were required to remain onboard their aircraft while awaiting redeparture. Without the presence of TSA to rescreen deplaned passengers, those passengers could not be returned to their aircraft, effectively turning a “gas and go” flight diversion into a flight diversion and cancellation at an outstation. The RAA member airlines wish to thank the TSA officials participating in the Task Force who took this concern both to heart and back to their offices, with the result that procedures have now been put into place to meet both security needs and the passenger comfort considerations at the heart of the Task Force effort. The RAA further wishes to encourage CBP to make similar provisions to meet the needs of airlines and their passengers when it is necessary for weather or safety reasons to divert an international arrival flights to an airport at a time when CBP staffing is not present.

### **Conclusion**

The RAA and its member airlines again wish to thank the Secretary of Transportation for our collective inclusion on this important National Task Force. It is not unexpected that widely differing views were voiced on a number of the issues brought before the Task Force. Yet we believe that the Task Force presentation and discussion process has worked to better bring the

parties together in their understanding of the human and operational issues involved when lengthy airline on-board ground delays regrettably occur, as they will for reasons beyond anyone's control and despite the best efforts of airlines, airports and the government agencies involved in air transportation. The RAA and its member airlines believe that the approaches and guidelines presented in this National Task Force report provide the information and support necessary to facilitate improvements to the care provided to airline passengers when these events occur.