



June 15, 2022

Joseph G. DePete  
President  
Air Line Pilots Association, International  
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Dear Joe:

I'm writing in response to your letter of June 14, in which you accused me of lobbying to weaken airline safety. This disgraceful attack represents the latest in ALPA's consistent battle against reality and marks a new low in your war against the regional airlines that employ many of your members and provide the only source of air service for most of the country.

RAA and ALPA have a long history of working shoulder to shoulder in the interest of aviation safety, most meaningfully in pursuit of the gold standard safety programs that go to the very heart of today's safe system.

Compare this with yesterday's letter, where today's ALPA conflates time building with training, two terms you know are not synonyms, while mischaracterizing efforts to provide more of the training you formerly lauded as superior to those hours. Reasonable people may disagree about the value of an hour in flight, but ALPA once agreed with us on the inappropriateness of relying on hours as a proxy for experience, as [ALPA said in comments to the First Officer Qualifications ANPRM](#):

*"A high-time pilot may, for example, be a "low-experience" airline pilot if nearly all of his previous flight time has been accumulated in small, slow, single-engine aircraft. A low-time pilot may not meet the definition of a "low-experience" pilot if, for example, he or she has had sufficient education, training, and flight time in transport category aircraft or simulators, and brings a very professional approach to the flight deck."*

In addition to misapplying aeronautical terms to execute a safety smear, today's ALPA has promulgated distorted data while claiming that every airline CEO who has addressed the pilot shortage is lying and that airlines of all sizes are leaving fares on the table during the highest Revenue per Available Seat Mile (RASM) in industry history because, as you say, they *want to make aviation less safe*. These claims are not just false, they are shameful.

Unfortunately, these falsehoods continue a troubling pattern. Over the past decade, ALPA has increasingly turned its focus from safety advocacy toward a protracted campaign to boost collective bargaining efforts and ultimately undermine the regional industry it characterizes as "outsourced flying," even as this partnership between major airlines and smaller regional carriers is imperative to communities with fewer passengers traveling. Indeed, as ALPA wages this battle against smaller airlines, [small community air service is collapsing](#).

On your website and social media, you applaud your own efforts toward broadening diversity and boosting career access, yet on Capitol Hill, ALPA has become the party of "no" on efforts that will actually do so. For example:

- Despite ALPA saying it [promotes better financing for student pilots](#) that will open up career access to more people without wealth, ALPA is withholding support for anticipated legislation, conditioning such support on an untenable requirement that these financing tools are reserved for only those pilots following degree pathways. As you know, most airlines no longer require a college degree to be hired as a commercial airline pilot, and accredited non-degree pathways are currently eligible for financial aid under existing law.

- Despite [ALPA making these comments](#): “We concur with the recent statement by the Flight Safety Foundation that the public deserves “a more sophisticated solution than a blanket move to 1,500 hours,” and “We believe that the law’s flight-hour credit provision is entirely justified on the basis of quality of experience and not merely quantity of experience,” you have dismissed and distorted proposals to expand these very structured training pathways.
- Despite FAA finding [no correlation with the flight hours element of the First Officer Qualification Act with any of the accidents](#) predating the rule, you frequently use a [chart](#) drawing a false association between the *hours element* of the FAA’s First Officer Qualifications rule and a reduction in accidents, while ignoring the [more meaningful developments](#) that have advanced today’s safe system.
- Despite ALPA repeatedly emphasizing the importance of experience and mentoring, and previously taking the position that “[mandatory retirement should be based on a pilot’s actual mental and physical capabilities rather than an arbitrary age](#),” ALPA today [opposes](#) measures to align the retirement age for pilots with social security, even claiming these experienced pilots’ service would introduce [risk](#).
- Despite the skills held by targeted international pilots interested in working in the United States, where they are desperately needed, ALPA opposes this too, [citing financial objectives](#).
- Despite ALPA’s duty of representation to the regional airline pilots among your membership, ALPA leaders actively [work to undermine these companies](#), even during the pandemic. It is worth noting that the [three significant regional airlines](#) that ceased operations in the pandemic were ALPA represented.

As lawmakers, journalists and the public have begun scrutinizing ALPA’s role in blocking career access, you are now resorting to red herring accusations around the Payroll Support Program (PSP), which [ALPA itself described](#) as a “*worker first,*” program keeping “*thousands of pilots and aviation workers on the job and off of unemployment.*” Now you allege airlines have misused these funds. This is false. Airlines used this lifeline as Congress intended, as you know well. In fact, the Government Accountability Office has closely monitored implementation and oversight of PSP with more than nine reports issued, each showing a very high rate of program compliance.

Joe, under your leadership, ALPA has lost its way and its once admirable safety voice has been overrun by collective bargaining aims. Today, airlines are working largely *without ALPA’s support* to boost career access and bolster the pathways that lead to the highest proficiency and level of professionalism and safety in the commercial flight deck. We miss our once strong safety partnership and encourage you to abandon your misleading discourse and ad-hominin attacks, roll up your sleeves, and join us in protecting the future of our industry.

Sincerely,



Faye Malarkey Black  
President & CEO  
Regional Airline Association