



June 21, 2023

Dear Senator on the Senate Committee on Commerce, Science, and Transportation:

Along with our members, RAA is committed to working cooperatively towards a long-term FAA bill that protects the highest level of safety, advances pilot training, and helps ensure the most qualified pilots are providing air service to communities of all sizes. We look forward to continuing to work with Chairs Cantwell and Duckworth and Ranking Members Cruz and Moran along with every Committee Member to achieve these goals.

Air service across the country is disappearing due to a shortage of airline pilots. Today, 42 U.S. states have much less air service than before the pandemic. Network carriers have exited 73 markets since 2019, under a debilitating loss of regional lift. 321 airports have lost air service, on average, losing 26% of their flights. 61 airports have lost more than half their flights and 16 airports have lost all flights.¹

A bipartisan group of Senate Commerce Committee Members have worked with stakeholders, constituents, airports, and community leaders to draft sound amendments to address the pilot shortage. These measures have the support and votes needed to pass in the Committee. Unfortunately, the Air Line Pilot Association (ALPA) opposes them, and the Senate Majority Leader will not allow the mark-up to be scheduled until these issues are resolved. We can speculate on [why ALPA doesn't want to solve the pilot shortage](#).² However, Senate leaders must ensure a labor union representing [the wealthiest work group in America](#)³ does not exert undue influence on what can and cannot be considered by the U.S. Senate.

I respectfully write today to urge rescheduling of the stalled FAA mark-up, and ask that Senators be allowed to offer, debate, and vote on two air service preserving and safety enhancing amendments. The first amendment meriting consideration would [raise the pilot retirement age](#) from 65 to 67—the age where most Americans become fully eligible for their social security benefits.⁴ This bipartisan amendment addresses ageist policies that have no basis in science. No other profession in the world is assessed as extensively and as frequently as pilots, who undergo frequent, rigorous medical and competency screenings to assure fitness to fly. Raising the age keeps experienced, mentor captains in the flight deck, supporting career entry and progression of the next generation of first officers, who cannot fly without Captains. Raising the retirement age also allows time for necessary, longer-term solutions to the pilot shortage to mature.

The second amendment relates to expanding and improving the pilot training pipeline. The pilot shortage has been growing for decades, driven by inequitable and insufficient access to pilot training. A key constraint has been the FAA's inaction in advancing pilot qualification standards envisioned under the *Airline Safety Act of 2010 (2010 Airline Safety Act)*, which directed FAA to approve additional structured training pathways when doing so enhanced safety.⁵ FAA

¹ July 2019 vs. July 2023 U.S. Carrier Schedules, excluding Alaska

² <https://fortune.com/2023/02/09/pilot-shortage-affecting-airlines-union-leverage/>

³ "Pilots' pay is reaching astronomical levels, with some of the most experienced aviators earning up to \$700,000." <https://www.barrons.com/articles/pilot-pay-soaring-airlines-stock-travel-delta-american-united-db94a84e>

⁴ See: https://www.raa.org/wp-content/uploads/2023/06/024_RAA_MythsFacts.pdf

⁵ *Airline Safety and Federal Aviation Administration Extension Act of 2010*, sec. 217(d) (P.L. 111-216).

published its First Officer Qualification (FOQ) rule in 2013 and created three training pathways at that time, indicating a review of future data would be forthcoming. In the decade since, FAA has taken no action despite huge advancements in pilot training and technology and despite multiple updates of the same data it used to craft the rule, each showing pilot proficiency has declined, not improved, due to an overreliance on flight hours.⁶

Today, most pilots lack access to structured training programs and instead use hours-based pathways with *no* additional training. The amendment in question prompts the FAA to create a detailed Enhanced Qualifications Program (EQP) that allows airlines, with strict FAA oversight and approval, to offer more of the pilot qualification pathways that feature training and a higher level of safety. The amendment is based on recommendations of FAA's own safety subject matter expert Air Carrier Training Aviation Rulemaking Committee (ACT ARC) in 2016. This recommendation was thoroughly considered and approved by a broad cross-section of government and industry aviation safety experts, including ALPA. In fact, ALPA not only participated in, but co-chaired the working group and voted to recommend the pathway it now decries as "unsafe." [Facing political pressure similar to what we are seeing today](#), FAA ultimately took no action on these expert recommendations.

Like the expert recommendations it is based upon, the proposed EQP amendment would add, not reduce, flight training. The amendment also explicitly states that it does not change the FOQ Rule or 1,500-hour requirement in any way. Flight time remains a key component of pilot qualifications. However, today's flight time requirements have no stipulations or associated training, and this flight time is accumulated *after* pilots complete training. These flight hours are unsupervised and unstructured, taking place in aircraft and environments that are nothing like commercial flying, where pilots have no opportunity to practice relevant skills. Meanwhile, the past decade has brought vast advancements in academic training programs, including flight simulation technology. The structured training environment offers the only way to expose pilots to risky situations they will never encounter building hours today. Flight instructors can use flight simulators and advanced flight training devices to build a robust curriculum to train on emergencies, adverse weather conditions, and crew resource management techniques in a multi-crew environment. This allows mastery of crucial, commercial flying skills that are impossible to replicate in small, slow, single-engine aircraft. Simulators additionally keep performance data for evaluation of a pilot's performance as skills are mastered. Any situation can be loaded onto and practiced in an advanced flight simulator, including the "Miracle on the Hudson," both 737 MAX accidents, and the Colgan accident.

Keeping stale, out-of-date standards that ignore advancements in U.S. technology and training expertise does nothing to advance safety. And ALPA's safety allegations are [provably false](#). Meanwhile, the worsening pilot shortage carries its own safety risk. [When travelers lose flights, they drive](#). Americans already drive more today than they did during the height of the pandemic. Tragically, 42,795 people lost their lives to motor vehicle crashes last year.⁷ These harms, like air service loss, fall disproportionately on rural communities. About half of our country's fatal crashes occur on rural roads, yet just 19% of the U.S. population lives in rural areas.⁸ The pilot shortage has had devastating consequences for smaller communities, where economies rise or fall based on the quality of the local infrastructure. Inaction on the pilot shortage, as one Democratic mayor said last month, is what "[people in the Midwest think of when they say Washington doesn't think of them](#)."⁹

⁶ <https://www.google.com/search?client=safari&rls=en&q=pilot+source+study&ie=UTF-8&oe=UTF-8>

⁷ <https://www.nhtsa.gov/press-releases/traffic-crash-death-estimates-2022>

⁸ <https://www.ghsa.org/resources/news-releases/GHSA/Rural-Road-Safety22#:~:text=WASHINGTON%2C%20D.C.%20-%20Rural%20roads%20are,population%20lives%20in%20rural%20areas>

⁹ <https://www.politico.com/news/2023/04/25/rural-america-airport-service-00093795>

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Again, I respectfully request that Senators on the Committee think of their constituents and urge a fair discussion and vote on amendments that advance safety and support more pilot training pathways. Please don't allow the demands of a special interest group with collective bargaining goals to undermine safety advancements and our nation's connectivity. I urge the Committee to allow a debate and vote on these important, bipartisan amendments on their merits.

I thank you for your consideration and our team stands ready to answer any questions you may have.

Sincerely,

A handwritten signature in cursive script that reads "Faye Malarkey Black".

Faye Malarkey Black

President & CEO, Regional Airline Association (RAA)