



January 10, 2019



The Honorable Donald J. Trump
President of the United States



The White House
1600 Pennsylvania Avenue
Washington, DC 20500



The Honorable Nancy Pelosi
Speaker
U.S. House of Representatives
Washington, DC 20515



The Honorable Mitch McConnell
Majority Leader
U.S. Senate
Washington, DC 20510

Dear Mr. President, Madam Speaker and Leader McConnell:



We write to urge you to act now to prevent the negative impacts currently being experienced by the U.S. aviation and space transportation industries that supports the traveling and shipping public and all the users of satellites and spacecraft. As the partial government shutdown continues, the human and economic consequences are increasing and doing greater harm. Civil aviation alone supports more than 7 percent of the U.S. gross domestic product (GDP) and \$1.5 trillion of economic impact, creating over 11.5 million jobs, but this shutdown is hampering our ability to function effectively.



Specifically, we are asking elected leaders to immediately resolve the following concerns:



Federal Aviation Administration (FAA)



FAA Staffing: Federal employees working without pay are bearing an unsustainable and unfair burden, as many are experiencing a financial hardship. And the degradation of morale and impact on retention rates should not be underestimated. Most of the FAA staff who certify the safety of aircraft have been furloughed and safety reporting and oversight systems have been suspended. This is critical to resolving identified issues. The continued shutdown of these certification functions will also delay some companies in bringing their products to market and hurt deliveries and exports. We understand and appreciate that the FAA is committed to bringing all safety inspectors back to work, but it is not currently clear whether they will be able to perform key functions impacting operations. Additionally, all policy and rule-making for the fast-growing Unmanned Aircraft Systems (UAS) market have been halted as has processing of waivers for commercial drone operations.



Air Traffic Control (ATC): Training of air traffic controllers has been suspended, slowing the arrival of new workers in a system that is already at a 30-year low. As the shutdown persists, excepted air traffic controllers and workers in technical operations, who operate and maintain safety-critical navigational aids, surveillance, and communications equipment, are performing highly skilled and safety-critical services without pay. Moreover, the shutdown strains resources that are available for maintaining and servicing these critical ATC systems.



New Aircraft Certification and Authorization: Certification and regulatory reform activities have halted and validation activities between FAA and other aviation authorities cannot be completed. Airlines and charter operators are not able to add new planes to their fleets due to a lack of authorization through the FAA. The service these aircraft provide to communities, including air medical flights, could be delayed. The continued shutdown of certification functions will delay commercial and general aviation aircraft deliveries and exports. This will slow the introduction of new products and technology and result in airlines not being able to add new planes to their fleets, hindering planned routes and potentially resulting in flight cancellations. Certification and work on safety-related airworthiness directives are curtailed during the shutdown and aircraft that have been delivered to airlines are idled until the FAA authorizes their operation, resulting in revenue losses that can easily exceed millions of dollars per day.

Recurrent Certification: Certain certificates (like EASA 145) expire unless the FAA performs periodic safety inspections. Businesses need these certificates as a condition of performing safety-sensitive work and their expiration undermines safety. Some businesses may lose contracts to foreign competitors whose certificates are renewed by their governments.

Registry and Aeronautical Center Counsel: Despite the FAA Registry being deemed essential in the most recent FAA Reauthorization bill, attorneys have been deemed non-essential, so non-routine registrations are not being processed. As a result, airlines have limited access to capital and reduced liquidity for aircraft trades. Further, additional leasing costs will be imposed on U.S. investors and airlines while the shutdown persists.

Pilots: The FAA is unable to issue new student pilot certificates, which has halted training for countless prospective pilots. Similarly, the FAA is unable to issue certifications required for current pilots to upgrade their position meaning these pilots will experience a delay in their planned upgrades until the shutdown is resolved. The FAA is not processing mandated pilot background checks (PRIA). These are critical for continuity of operations - without these PRIA authorizations, new hire pilot training is at a standstill.

Mechanics: The ongoing furlough is hindering knowledge, oral and practical testing for aviation mechanic certificate applicants and holding up would-be mechanics ready to commence new careers in aviation maintenance. Airman knowledge testing activities require manual administration by the FAA Airman Testing Standards Branch personnel, and some designated mechanic examiners are unable to get requisite approvals from local office personnel to commence oral and practical testing.

NextGen: The FAA has halted the development and operational testing of technologies for NextGen—the agency’s program for modernizing the air traffic control system. NextGen has been plagued by funding stops and starts in the past and it is costing the taxpayer millions in inefficiencies associated with this instability. New fuel-efficient Performance Based Navigation (PBN) routes and airport approaches are being delayed which further increases the cost for pilots and passengers.

Training: The FAA is unable to approve training manual revisions, including for stall training; it cannot authorize training center evaluators; and it will not be able to recertify flight simulators. Without these approvals, training centers are no longer able to provide recurrent training to airline and general aviation pilots.

Construction Applications: The FAA is unable to review and approve applications for new or expanded airport facilities. Therefore, agency representatives are not coordinating with airport staff on upcoming construction projects, creating unnecessary cost increases and delays in completing critical airport-improvement projects nationwide.

Commercial Space: A minimal team of engineers working without pay continues to provide critical public safety inspections of already-licensed launches and reentries, however, all licensing activities are shut down. Many launches require license modifications to factor in new data or improved processes, and the obsolete nature of current regulations means even nominal missions usually need one or more waivers of current rules. Those license modifications and waiver requests are not being considered or approved, risking delays to scheduled launches. Many of the activities currently scheduled to support upcoming commercial launches will in fact be delayed until after the Office of

Commercial Space Transportation reopens, costing both established and entrepreneurial spacecraft builders money and critical time. And it may take several months for the government and industry to simply catch up with a shutdown-caused backlog of licensing, flights and payloads.

Department of Homeland Security

Transportation Security Administration (TSA) and Customs and Border Protection (CBP):

Nearly all TSA and CBP personnel are working without pay, which creates a severe financial hardship for many. Many are warning that several Transportation Security Officers (TSOs) are living paycheck to paycheck and will be forced to find other work, without any means to replace them. We expect workforce capacity issues will increase the longer the government is partially shut down and employees face working without the certainty of a paycheck. This could result in significant operational impacts at airports across the country.

For those CBP employees who are furloughed, their absence is having a noticeable negative impact on international aviation operations. These employees have critical cross-border administrative functions and manage important CBP programs.

With fewer TSOs available to screen travelers at security checkpoints, wait times will grow and larger crowds will be forced to congregate in public areas of airports. In some cases, checkpoints may have to be closed as a result of the shutdown. Some airports are already struggling to keep up with a record number of travelers, and reduced staffing levels will exacerbate problems in the near-term and into the busy spring and summer travel seasons. Reduced staffing levels are of particular concern at airports that have high-profile events ongoing or scheduled to occur in the near future, including major trade shows and sporting events.

Due to the shutdown, CBP has closed enrollment centers for its Global Entry program, a trusted traveler program that enhances aviation security. Additionally, the delayed issuance of customs seals as a result of a restriction on excepted activities, adversely impacts airport and airline employees' ability to work in CBP-controlled areas of airports.

Working without pay is aggravating the already high attrition rates of TSOs who perform critical front-line security functions at airports and reducing the possibility of attracting the best candidates for these key federal positions in the future. The partial government shutdown significantly diminishes the attractiveness of either TSA or CBP as a viable career choice, a problem the industry cannot withstand when it is already operating at a major deficit.

This partial shutdown has already inflicted real damage to our nation's aviation system and the impacts will only worsen over time. We urge you to act quickly to resolve these issues.

Sincerely,

*Aerospace Industries Association
Aeronautical Repair Station Association
Air Line Pilots Association
Air Medical Operators Association
Air Traffic Control Association
Aircraft Owners and Pilots Association
Airlines for America
Airport Consultants Council
Airports Council International-North America
American Association of Airport Executives
Association of Air Medical Services
Association of Flight Attendants - CWA
Association for Unmanned Vehicle Systems Int'l
Aviation Suppliers Association
Aviation Technician Education Council
Cargo Airline Association
Commercial Drone Alliance*

*Commercial Spaceflight Federation
Experimental Aircraft Association
General Aviation Manufacturers Association
Helicopter Association International
International Air Transport Association
International Brotherhood of Teamsters - Airline Division
Modification and Replacement Parts Association
National Air Carrier Association
National Air Traffic Controllers Association
National Air Transportation Association
National Association of State Aviation Officials
National Business Aviation Association
Professional Aviation Maintenance Association
Regional Airline Association
Security Manufacturers Coalition
Travelers United
U.S. Travel Association*