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# Cash, Smith & Wages

Organizational Development & Government Affairs

ORIGINAL

September 22, 1999

U. S. Department of Transportation Dockets  
400 Seventh Street, S.W.  
Room Plaza 401  
Washington, DC 20590

Re: Docket # FAA-1999-6001 -14

99 SEP 24 PM 2:59  
DEPT. OF TRANSPORTATION  
DOCKET SECTION

Dear Madam/Sir:

The Association of Professional Flight Attendants (**APFA**), representing the 21,000 flight attendants at American Airlines, applauds Administrator Garvey and the FAA in taking the initiative to gather safety and security information on a voluntary basis. As stated in the legislative history, this information "could help to improve air safety by helping safety **officials** identify trends before they cause accidents." Juxtaposed to the current study of safety trends in hindsight, this is a much needed forward-thinking approach to aviation safety. Nonetheless, the APFA must oppose this NPRM due to its lack of necessary employee protections.

The APFA agrees with the White House Commission on Aviation Safety and Security in its recommendation that noted that the most effective way to identify problems is for the people who operate the system to self-disclose the information, but that people will not provide information to the FAA unless it can be protected. As outlined in the NPRM, the APFA supports the disclosure of voluntarily provided information being "de-identified" and circumstances summarized omitting specifics of aircraft and crew members names. While the FAA would provide protections for information gathered voluntarily, it would not provide protections for employees from employer retaliation. Since aviation employees do not have whistleblower protections, an employer may become aware of information provided to the FAA via other channels and take action to punish the employee. Essentially, employees will still not be free to provide information to the FAA that might be helpful in determining safety trends, and this NPRM will provide false security to employees by creating the illusion that they are protected. Whistleblower protections are necessary to the implementation of this NPRM.

Thank you for this opportunity to comment. Please feel free to contact me at 703-548-3676 or APFA National Safety Coordinator Kathy Lord-Jones at 800-395-2732 ext. 8302.

Sincerely,

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APFA Washington Representative

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