



October 6, 2010

The Honorable Raymond H. LaHood  
United States Secretary of Transportation  
U.S. Department of Transportation  
1200 New Jersey Ave., SE  
Washington, DC 20590

Dear Secretary LaHood:

On behalf of the 40,000 American Airlines workers our unions collectively represent, we are writing to emphasize the importance of uniform application of regulatory standards by the Federal Aviation Administration (FAA).

It is our perception that American Airlines—as the only major U.S. carrier that continues to perform the great majority of its maintenance in-house—has been subjected to greater scrutiny than carriers that outsource most or all of their maintenance work to foreign repair stations. That perception is supported by Office of Inspector General (OIG) audits of the FAA's oversight practices.

In 2003, the OIG reviewed the increase in outsourced maintenance by U.S. air carriers and identified multiple issues of concern, including the FAA's inadequate preparation for that outsourcing trend and gaps in its oversight capabilities, and security issues that needed to be addressed by the Transportation Security Administration. The OIG made nine recommendations addressing steps the FAA could take to close the oversight gap.<sup>1</sup> A subsequent series of high-profile events in 2008<sup>2</sup> showed

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<sup>1</sup> OIG Report AV-2003-047 July 8, 2003

that serious oversight issues remained. Moreover, when the OIG followed up with additional recommendations in 2008<sup>3</sup>, it became evident that the FAA had not addressed many of the OIG's earlier recommendations.

In a Jan. 11, 2010 letter to U.S. Senator Claire McCaskill, the OIG noted that of 23 recommendations regarding aviation safety and security, the FAA had addressed only seven. Sixteen recommendations remain open, including several concerning repair station oversight and maintenance. The FAA's response was that they have steps in place to address eight more of the OIG's recommendations.

That lack of urgency in responding to the issues posed by large-scale maintenance outsourcing by U.S. carriers stands in sharp contrast to the FAA's treatment of American Airlines—again, the only U.S. carrier that still performs most of its maintenance in-house. When the FAA recently announced its \$25 million fine of American Airlines regarding MD80 auxiliary pump wiring harness issues, you stated, "There can be no compromise when it comes to safety."

While we agree with you in principle, we believe the FAA's response was not appropriately calibrated in this instance. The Airworthiness Directive (AD) process in question was easily misinterpreted, with other carriers experiencing difficulties similar to what occurred at American Airlines. FAA inspectors even had differences of opinion among themselves on what the AD instructions meant.

The Transport Workers Union, the Allied Pilots Association and the Association of Professional Flight Attendants have consistently advocated adherence to the highest safety standards. Our TWU aircraft maintenance technicians are highly experienced professionals who would not knowingly allow any aircraft to fly that had a legitimate safety-of-flight issue.

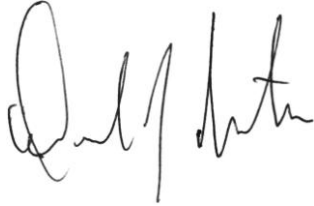
We believe keeping aircraft maintenance work in-house represents the optimal approach by U.S. carriers to help ensure the safety of the traveling

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<sup>2</sup> 2008: Southwest grounds 43 737s after it is revealed that crack inspections were not carried out properly; 2008: American Airlines MD grounding over AD compliance issues; 2005: TIMCO has undocumented aliens working at repair station in Greensboro, NC.

<sup>3</sup> OIG Report AV-2008-090 Sept. 30, 2008

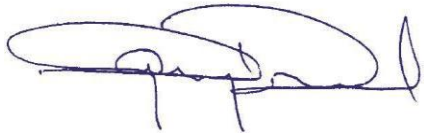
public. We likewise believe that all operators and maintenance providers must be held to the same high standard. It is therefore essential for the FAA to address well-established safety and security oversight gaps immediately—the time to act is now.



**Allied Pilots Association  
President  
CAPTAIN DAVID J. BATES**



**Association of Professional Flight Attendants  
President  
LAURA GLADING**



**Transport Workers Union of America, AFL-CIO  
International Vice President  
Director Air Transport Division  
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