

inspection and maintenance programs. The hearing discussion included the notion that the FAA treated airlines as “customers” rather than companies that are to be regulated. We believe this current FAA NPRM is an extension of the Southwest Airline’s petition for exemption and therefore our previous comments to that particular docket are relevant for the FAA to consider in this docket as well.

This FAA partnership is alluded to in Southwest Airline’s petition for exemption and the FAA grant of the exemption. Also, according to an internal Southwest Airlines letter, "There is a federal regulation that addresses the number of flight attendants required during intermediate stops...While we had discussions with the FAA over the years as to our practices and their interpretations, we had, up until 2005 generally operated in a manner whereby we boarded and deplaned an aircraft with at least one flight attendant onboard." Yet this practice was not followed by any other U.S. carrier, all of whom followed the regulatory requirement of having the minimum crew on board at all times during boarding. It appears that on this issue of whether or not to maintain the currently required ability to conduct an emergency evacuation of the aircraft, the FAA is not assigning, maintaining, and enhancing safety and security as the highest priorities in air commerce as directed by statute. 49 USC 40101(d).

AFA-CWA submits the following more specific comments relative to Notice No. 09-01.

The FAA cites that changes to the regulations since 1985, specifically improved firefighting equipment, improved interior flammability standards and thermal insulation, and improved access to Type III emergency exits have reduced the hazards to passengers. While AFA-CWA does not disagree that these are improvements in cabin survivability aspects we do not believe they justify a reduction in flight attendant staffing requirements.

In Notice No. 09-01, the FAA further cites that operational regulations have reduced the risks to passengers during boarding and deplaning. One specific argument is that carriers are required to have a carry-on baggage program that screens for excess and oversized carry-on baggage. The FAA claims that these programs have reduced the flight attendant workload in the handling of carry-on baggage during passenger boarding. On page 3471 of the Notice No. 09-01, the FAA specifically states, “Flight attendants no longer have to stow an unlimited amount of baggage carried on the airplane by passengers.”

As the representative of 55,000 flight attendants we reject this claim. Our information shows exactly the opposite. AFA-CWA informally surveyed our safety representatives from the airlines that we represent and all agreed that carry-on bags were still a problem at their individual carriers and that the amount of carry-on baggage has not been reduced. In fact, some safety representatives reported that the amount of carry-on baggage has actually increased because carriers are now charging for checked baggage so passengers are bringing more bags into the cabin in order to circumvent paying the checked baggage fee. A quick search of the web shows that multiple airlines are charging for checked bags. Airlines are also recognizing and admitting the phenomenon that passengers are checking fewer bags.

Last October, US Airways reported an initial drop in checked luggage of 15% for the first bag and 40% for the second bag, so about a 25% drop in overall checked luggage following the initiation of fees. According to a recent US Airways presentation to Merrill Lynch and at the company's media day, CEO Doug Parker said the drop in checked luggage is 25%, so the trend continues.

At one airline, local FAA employees approached the carrier and required that the carrier form a special analysis team to address the carry-on baggage problems. It would seem that FAA Washington has not solicited input from their own FAA inspectors regarding carry-on baggage problems. It is our understanding that other carriers have also been approached by their FAA inspectors with concerns regarding the carrier's oversight and screening of carry-on baggage.

During passenger boarding the cabin can be a hectic, confusing environment with many passengers standing in the aisle, possibly moving in different directions. Stowage and removal of carry-on baggage is one of the factors that contribute to the confusion, contention, and additional movement in the aisle during boarding. We still receive reports from our flight attendant members regarding passengers' refusals to comply with carrier's carry-on baggage programs and ineffective enforcement thereof, that sometimes result in our flight attendants being put at risk for bodily contact and/or verbal abuse from the passenger. This could result in passenger interference with crewmember duties.

Further, the FAA's logic is contradictory in that they state that carry-on baggage is not a problem and then state the need for a flight attendant to get off the aircraft to clear carry-on bags off the aircraft. One of the main reasons flight attendants need to get off the aircraft to deal with removing the carry-on baggage is because carriers are not adequately screening the amounts and size of carry-on baggage prior to boarding. The other reason is that carriers do not have adequate staffing.

Our flight attendant safety representatives noted that part of the problem at their carriers was that in addition to the reduction of flight attendant staffing to minimum FAA requirements, the number of ground staff or gate staff has been reduced. The reduction of gate staff has exponentially increased the amount of duties the boarding agent must perform for each flight, one of which is the monitoring of carry-on baggage. It is the carrier's responsibility under their FAA operating certificate to ensure that they have adequate staffing to comply with the policies and procedures listed in the carrier's operational specifications.

FAA states that allowing flight attendants to conduct safety-related duties outside the airplane cabin may be in the interest of the traveling public. Our primary duties are onboard the aircraft, to cover our assigned emergency exits and to evacuate the aircraft in the event of an emergency or deal with a security threat onboard.

Carry-on baggage problems in the cabin are one of the reasons to maintain the required number of flight attendants in the cabin during boarding, not reduce it.

Specifically the FAA states that the proposed rule would allow a flight attendant to leave the cabin and "[remove] excess or oversized carry-on baggage from the airplane and

[place] it on the passenger loading bridge or adjacent to the bottom of the boarding stairs.” While ensuring that the carry-on bags are properly stowed for takeoff and landing is a safety related duty, it appears that the FAA is confusing this safety related duty with a customer service duty. What this is really about is that carriers do not have adequate staff monitoring carry-on bags or available to remove these items from the cabin, therefore flight attendants are left to perform these tasks. These “safety related duties” are in fact customer service duties to help ensure that the flight maintains an “on-time departure.”

Furthermore, the justification for this NPRM, in that it would allow flight attendants to remove excess or oversized carry-on baggage from the airplane and place it... adjacent to the bottom of the boarding stairs is inconsistent with the FAA claim of exclusive jurisdiction over the occupational safety and health of flight attendants on aircraft. This clearly shows that the FAA has neither thoroughly nor even adequately considered the injury consequences that could result from flight attendants being required to lift and handle these passenger bags. This may also be contrary to many carrier policies that do not require flight attendants to lift passenger carry-on baggage, and in fact, have denied flight attendant industrial claims regarding injuries resulting from stowing of passenger carry-on baggage.

AFA-CWA believes that the original petition for rulemaking by the Air Transport Association (ATA) to allow a reduction in flight attendant staffing and the approved Southwest Airlines petition for exemption were basically to allow flight attendants to do the work of ground staff under the auspices of “safety.”

It appears the FAA supports the concept of “customer service” in respect to a comment in the NPRM. The FAA states that another reason that a flight attendant may need to get off the aircraft is to “maintain custody of an unaccompanied minor.” In Southwest Airlines original petition for exemption they cited the need for flight attendants to get off the aircraft to assist elderly or disabled passengers, and escort unaccompanied minors to their parents. It is unclear to AFA-CWA why the flight attendant cannot maintain custody of an unaccompanied minor onboard the aircraft. The FAA NPRM states, “A flight attendant may be asked to conduct other safety-related duties during passenger deplaning, such as maintaining custody of an unaccompanied minor...” It appears that the FAA has accepted the argument that permitting a flight attendant to deplane to maintain custody of an unaccompanied minor is actually saying that it is acceptable for a flight attendant to escort them to their parents. These are historically gate agent duties and partially customer service duties not strictly safety.

By virtue of this NPRM it once again seems the FAA is placing a higher priority on “promoting air commerce” than on assigning, maintaining and enhancing safety and security in air commerce as directed by Congress.

The FAA cited that passengers will likely initiate their own “self-help” in the event of an emergency as justification for allowing reduced flight attendant staffing for boarding and deplaning phases of flight. The FAA claims that because passengers have met the criteria for an exit row occupant prior to boarding that makes them able to perform exit row functions. The flaw of this argument is that when a passenger checks in for a flight the front desk agent or boarding agent would simply verify that they have met the general

criteria of exit row compliance. That is, that they are physically suited to sit in the row and at least 15 years of age. The advent of electronic check-in allows, in many situations, a passenger to get all the way to the boarding gate with no personal contact with an airline representative. In some situations, with a rushed agent working the boarding process, even that evaluation may not be sufficient, if there even is an evaluation by the boarding agent. The next reality is that exit row passengers are not normally briefed until just before the forward entry door is closed. Passengers therefore could be sitting in an exit row the entire boarding process without having been verified by the flight attendants to meet the criteria or having been briefed on the exit row requirements or the directions regarding the opening method of that particular exit.

As a third justification for the allowed reduction in flight attendant staffing the FAA states that security enhancements since 2001 have reduced the risk of security-related threats during passenger boarding and deplaning. On Sunday, April 19, 2009 passengers on CanJet flight 918 were held hostage by a lone gunman in Jamaica. According to press stories, the man pushed his way onboard the aircraft during boarding at the gate and threatened the crew and passengers at gunpoint. The flight attendants acted quickly to move passengers around in the cabin to help alleviate the exposure of some to the threat. Additionally, the passenger and press credit the flight attendants with persuading the gunman to allow the passengers to be freed. This recent situation shows that security situations can and do arise and require immediate response of the flight attendant crew acting as a coordinated team. Despite stronger security regulations, the reality is that threats still present themselves. That is why flight attendants are trained every year on terrorist and security threat situations.

Furthermore, FAA cites no intelligence reports regarding the potential for security threats onboard and speciously points to security threats during boarding and deplaning. Yet by doing so, the FAA ignores the important role and experience of the flight attendant minimum crew in recognizing the idiosyncrasies, behavior and expressions of their passengers at certain times of the day, week and year. Especially since 9/11, the minimum flight attendant crew are responsible for trying to detect suspicious passengers or groups of passengers through their interaction with and observation of them during boarding. In this way the flight attendants can raise a concern about a passenger to initiate further scrutiny before the door is closed and the plane takes off.

Notice No. 90-01 proposes to allow one required flight attendant to deplane during boarding for "safety" related duties. This is for an airplane type that requires two or more flight attendants. The FAA has proposed restrictions relevant to the flight attendant leaving the aircraft to ensure that the current level of safety is maintained. While AFA-CWA is not in agreement with the proposed reduction for boarding and deplaning we are cognizant of the fact that the FAA is trying to limit the distance that a flight attendant is permitted away from the aircraft and the duties that may be performed. One of our concerns is that a carrier may make a determination that, for example, a seat duplication during boarding may by the carrier's interpretation may be considered a "safety" problem. AFA-CWA is not going to try to guess all the different tasks that a carrier may determine are "safety related" but our experience has shown that carriers can be very inventive when substantiating a policy or procedure that they would like their flight attendants to perform.

In the opening paragraphs of the NPRM the FAA states, “The FAA believes permitting only one flight attendant to deplane during boarding and limiting the amount of time he or she is absent from the airplane cabin (by limiting the type of duties he or she may perform) ensures the remaining flight attendant(s) are able to effectively manage safety duties inside the airplane.” 74 FR 12, Jan. 21, 2009, p. 3471. This statement is misleading. The NPRM in fact allows a reduction of two flight attendants for boarding due to the fact that the FAA is proposing to allow a flightcrew member to substitute for another flight attendant.

The FAA is proposing that certain conditions must be met before this substitution is permitted. First, there must be a “method” to ensure that the substitute flightcrew member is trained in all assigned flight attendant duties. It is unclear to AFA-CWA what “method” is required. Could this method be simply asking the flightcrew if they understand the duties of flight attendants or is this an actual training. It is imperative that the FAA require that the carrier ensure that the flightcrew member is trained according to the requirements of § 121.417, Crewmember Emergency Training. This includes emergency assignments, individual instruction in the location, function and operation of emergency exits in the emergency modes with the evacuation slide/raft pack attached; instruction in the handling of emergency situations, including evacuation; and emergency drill training in each type of emergency exit in the emergency mode, including the forces and actions required in the deployment of the emergency evacuation slides.

The FAA has another NPRM out for public comment regarding the Qualification, Service, and Use of Crewmembers and Aircraft Dispatchers (Docket No. FAA-2008-0677; Notice No. 08-07) that proposes changes to the current training regulations. The concern is that the FAA is proposing that using a flightcrew member would provide an equivalent level of safety by stating that there needs to be a method to ensure that the flightcrew member is trained in all flight attendant duties.

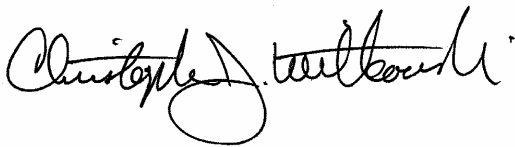
The current regulation requires that all crewmembers have recurrent emergency “hands-on” performance drill training on the use of emergency equipment and aircraft exits every 24 months. Under the proposed training regulation in Notice No. 08-07, required flight attendants would need to complete “hands on” performance drills using emergency equipment and procedures every 12 months. In contrast, the frequency of training for flightcrew members will go from every 24 months to every 36 months. AFA-CWA does not believe this meets an equivalent level of safety. If flight attendants are required to complete performance drills every 12 months and this Notice No. 09-01 is proposing to allow a flightcrew member to substitute for a required flight attendant, then the flightcrew member must also be required to complete performance drills every 12 months to ensure that an equivalent level of safety is maintained.

Before proposing a reduction in flight attendants certified to evacuate the aircraft in an emergency, the FAA should first determine who is going to be responsible for opening the emergency exit on the aircraft when the flight attendant assigned to that exit is 30 feet up the jetway. The FAA should review all reports held by the air carriers of incidents related to flight attendants and passengers on board the aircraft during boarding and deplaning to ensure a more realistic understanding of the difficulties and time pressures faced by flight attendants. FAA should also determine why passengers are able to bring

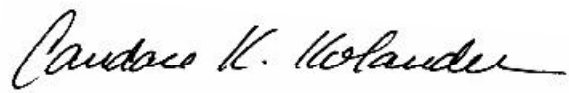
excessive and oversized carry-on baggage on board the aircraft and how to prevent this problem as a regulator instead of first reducing the number of flight attendants required during boarding and deplaning while suggesting that "It may be necessary for the certificate holder to revise other approved programs, such as its carry-on baggage program or exit seat program, to ensure all required duties are accomplished by the remaining flight attendant(s). 74 FR 12, Jan. 21, 2009, p. 3471.

AFA-CWA does not believe that this notice of proposed rulemaking regarding allowing reductions to the Crewmember Requirements When Passengers Are Onboard is in the public interest and for the above stated reasons, urges the FAA to withdraw this NPRM.

Respectfully submitted,



Christopher J. Witkowski
Director
Air Safety, Health & Security Dept.



Candace K. Kolander
Coordinator
Air Safety, Health & Security Dept.

July 25, 2008

Sent Via Fax
Fax No. 202-493-2251

Docket Management Facility
U.S. Department of Transportation
1200 New Jersey Avenue SE
West Building Ground Floor, Room W12-140
Washington, DC 20590

Re: Docket No. FAA 2006-25466

Dear Sir or Madam:

I am writing on behalf of the Association of Flight Attendants-CWA, AFL-CIO, in response to a Petition for Clarification or Amendment of Exemption 9382 regarding 14 CFR 121.391(a) and 121.393(b).

Please find attached our previously submitted comments regarding the Petitioner's original request for exemption from 14 CFR 121.391(a) and §121.393(b). We believe that many of our original comments are still pertinent to this Petitioner's request for clarification.

The regulatory history of 14 CFR 121.393(b) has always only allowed a reduction in the number of flight attendants required to be on board by § 121.391(a), and a substitution of other personnel trained in emergency evacuation under limited conditions. The intent of § 121.393(b), formerly §121.391(e), has only focused on stops where passengers remain on board. A history of questions regarding § 121.393(b), and former §121.391(e), have also continually referenced "intermediate stop" discussions.

Amendment 121-80 which amended § 121.391 by adding subparagraph (e) effective January 16, 1983 fully supported that a reduction of staffing was only relevant to intermediate stops:

"In the Notice, the FAA proposed to reduce the number of required flight attendants who must remain on board during intermediate stops. Intermediate stops are stops where passengers remain on board and proceed on that aircraft to another destination." 47 FR 56460, December 16, 1982.

Section 121.391(a) states the minimum complement of flight attendants must be on board the aircraft whenever passengers are on the aircraft based on certain factors such as seating capacity of the aircraft. This section also requires a full complement of flight attendants during the boarding and deplaning process of stops other than intermediate stops.

There is a clear distinction in the regulation between intermediate stops and stops where all passengers are enplaned and deplaned. Section 121.391(a) requires a full complement of flight attendants during the boarding and deplaning process.

Of course when new passengers are boarded, they have not received a safety briefing; they are naïve subjects as to the emergency procedures of that aircraft and it is critical that the minimum flight attendant crew per §121.391(a) be on board. Also, as these are not passengers who remained on board, the trigger for that exception is extinguished when these new passengers are boarded. There is not, nor has there been, any regulatory language that is inconsistent with this reading of former § 121.391(e) and current § 121.393(b).

The limited allowance of another person to substitute for a flight attendant was only intended for intermediate stops. Exemption 9382 authorized Southwest Airlines to reduce the number of required flight attendants on board the aircraft during the deplaning of passengers at an intermediate stop, and to substitute a pilot for one required flight attendant during boarding at an intermediate stop. In fact, throughout Southwest Airline's original petition for exemption they themselves continually referenced "intermediate stop" reductions and their reasons for wanting an exemption to intermediate stop staffing requirements.

This current petition is inappropriate as it is in effect and at the very least, a new petition for exemption, not a clarification as it is seeking a much greater exemption than what was originally requested on July 24, 2006.

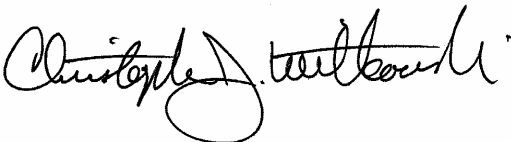
The Petition requests that the same crewmember staffing flexibility granted in Exemption 9382 be available at all aircraft stops where all passengers deplane, not just intermediate stops. As stated above, §121.391(a) requires that a full complement of flight attendants be present for boarding and deplaning.

The current request from the Petitioner is a significant change to §121.391(a). The intermediate stop exception provided in the rule regarding minimum flight attendants on board was never intended to apply to originating flights where passengers arrive on board the flight.

The petitioner's current request is a significant rulemaking change. It is a request to change the intent of 14 CFR 121.391(a) and § 121.393(b) and would eliminate the standard for the required number of flight attendants for deplaning and boarding at stops, and therefore requires public notice and comment rulemaking under the Administrative Procedures Act.

AFA opposes this Petition for Partial for Clarification or Amendment of Exemption 9382 regarding 14 CFR 121.391(a) and 121.393(b) for the above reasons and urges the FAA to deny it in full.

Respectfully submitted,



Christopher J. Witkowski
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September 26, 2006

Docket Management Facility
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Fax No. 202-493-2251

Via Fax

Re: Docket No. FAA 2006-25466

Dear Sir or Madam:

I am writing on behalf of the Association of Flight Attendants-CWA, AFL-CIO, in response to a Petition for Partial Exemption from Enforcement of 14 CFR 121.391(a) and 121.393(b).

Under limited conditions, FAR 121.393(b) allows a reduction in the number of flight attendants required to be on board by 121.391(a), and a substitution of other personnel trained in emergency evacuation.

Petitioner contends that the FAA made a fundamental change in its interpretation of FAR 121.391(a) and 121.393(b) when it published Flight Standards Information Bulletin for Air Transportation (FSAT) 01-03, "Number of Flight Attendants Required at Stops Where Passengers Remain on Board," and FAA Order 8400.10, vol.3, ch. 16, sec. 4, par. 2295. However, no fundamental change was made by the FAA in its interpretation of FAR 121.393(b), or its predecessor, FAR 121.391(e) per 203. ACOB No. 1-94-2. ACOB 1-94-2 states that "c. At intermediate stops where passengers remain on board the aircraft, at least the number of persons specified in FAR Section 121.391(e) must be aboard the aircraft." This interpretation is stating that FAR 121.391(e) allows a reduction of flight attendants or other personnel qualified in emergency evacuation procedures for passengers who remain on board. The operative words in this regulation are "remain on board." This reduction in flight attendant crew or allowance of other air carrier personnel to stand in for flight attendants is only triggered when either:

- 1) all other passengers at the intermediate stop have deplaned, or
- 2) the aircraft makes an intermediate stop and no passengers are deplaning or boarding at that stop.

Of course when new passengers are boarded, they have not received a safety briefing, and it is critical that the minimum flight attendant crew per 121.391(a) be on board. Also, as these are not passengers who remained on board, the trigger for that exception is extinguished when these new passengers are boarded. There is not, nor has there been, any regulatory language that is inconsistent with this reading of former FAR 121.391(e) and current FAR 121.393(b).

Petitioner tries to support his objection to the current interpretation of 14 CFR 121.393(b) by referring to FAA guidance found in a 20 year old Action Notice, A 8430.5, regarding former 121.391(e) that states that:

“(3) At intermediate stops where passengers remain on board the aircraft, at least the number of persons specified in Section 121.391(e) [the reduced number] must be aboard the aircraft. This includes that period of time during which passengers are deplaning or boarding.”

This guidance still said that the regulation requires the minimum crew required by 121.391(a) to be aboard the aircraft during boarding at the originating point and during deplaning at the destination point.

However, the next FAA guidance document (ACOB No. 1-94-2) of the identical rule, 121.391(e), deleted the second sentence of number 3 in the 1986 Action Notice and by implication, interprets the rule to not allow other than the flight attendant crew required by 121.391(a) during boarding and deplaning at intermediate stops.

This rebuts petitioner’s claim that the allowance of pilots or other airline personnel trained in emergency evacuation was meant to be allowed by 121.391(e) during boarding or deplaning of passengers at intermediate stops, as a basis for his request to allow a pilot to substitute for a flight attendant during boarding.

Between the issuance of the FAA temporary guidance in 1986 and the guidance that changed it in 1994, there was an NPRM that was issued by the FAA on April 14, 1989 that Petitioner contends would have changed 121.391(e) to add the second sentence from number 3 in the above-mentioned 1986 FAA guidance. In fact, what happened directly contradicts the arguments Petitioner makes to support his request for exemption. In the end, the FAA:

- 1). issued new guidance in 1994 (203. ACOB No. 1-94-2) that dropped the sentence that Petitioner claims to be valid,
- 2). renumbered and amended 121.391(e) in 1995 to become 121.393(b) and remove the word “intermediate” before the word “stop,” where it was used in 121.393(b)(3), and
- 3). withdrew the 1989 NPRM.

Petitioner complains that his Petition for Exemption was prompted by FSAT 01-03A, FAA’s guidance on 121.391(a) and 121.393(b), which did not provide for public notice and comment under the Administrative Procedures Act. He implies that notice and comment would be required were FAA to have changed its interpretation of these rules.

However, FSAT 01-03A is consistent with the interpretation of the rule before it was amended, consistent with the preamble to the amendment which incorporated the rule and therefore there is no change in interpretation.

FSAT 01-03A did not change existing FAA policy and there was no requirement for notice and comment. Although there was a temporary differing change in guidance (Action Notice A 4430.5) in anticipation of a possible change in the regulatory requirements, that proposed change was withdrawn and the guidance that is consistent with FSAT 01-03A, as well as the FAA's May 14, 1985 Cassady Memorandum, was issued.

On Page 5 of the Petition, it is claimed that, after the FAA issued a memo stating that the minimum number of flight attendants per 121.391 must be onboard at all times that passengers are on the aircraft, the Air Transport Association (ATA) disagreed and petitioned the FAA for a rulemaking "to amend FAR 121.391(a) to allow less flight attendants than presently required to be on board a passenger-carrying airplane when passengers are onboard other than during flight time." 46 FR 12981 (2-19-81).

The FAA did issue a rule change but that rule was not what ATA requested through their petition. 121.391(a) as written is consistent with the Cassady Memorandum. Page 5 of the petition relates the provisions of the 1982 rule, 121.391(e), and says that the preamble to the rule notes that "[w]hen boarding begins, the full contingent of flight attendants has generally returned to their duties on the airplane." It is not a given that by this statement, as Petitioner claims, "The FAA thus recognized and accepted the fact that Flight Attendant duties off the aircraft would, on occasion, preclude the full complement of Flight Attendants being onboard during passenger enplanement." This note in the preamble may mean that the FAA recognizes that it is not a burden on the air carrier to have a full complement of flight attendants on board when boarding begins, which is the meaning consistent with the Cassady memorandum.

Petitioner is incorrect that his petition is in the public interest. This is more than a petition for exemption, it is a request to change the intent of FARs 121.391(a) and 121.393(b) and would eliminate the standard for the required number of flight attendants for deplaning and boarding at stops. Members of the public rely on this safety standard to help ensure their safe deplaning and boarding in the presence of flight attendant crew.

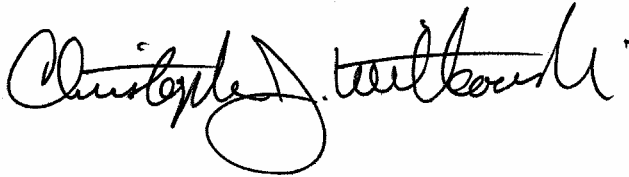
The Petitioner's request would allow removal of flight attendant crew during this time and does not provide an equivalent level of safety. According to the Wall Street Journal, the FAA has logged 60 cases of lithium and lithium-ion batteries for portable electronics overheating, emitting smoke or fumes, or exploding since 1991 and in the past two years, six incidents have occurred on aircraft, including five fires and an overheated flashlight that had to be handled with oven mitts. [Flight Risk: Laptop Dangers Draw Scrutiny From Airline-Safety Regulators](#), Corey Dade; The Wall Street Journal; Eastern edition; Aug 14, 2006; A.1.

In addition to a reduced level of safety for the public, a reduced level of security would result if this Petition is granted. Petitioner fails to recognize the importance of having all of the flight attendants required by 14 CFR 121.391(a) on board during boarding and deplaning. In the post 9/11 environment, the FAA and TSA have developed guidance that emphasizes the need for crewmember involvement, which begins with the pre-flight and boarding process and ends after the aircraft is deplaned. Flight attendants are to be alert to unusual or suspicious behavior by assessing each passenger's behavior and to use effective teamwork in doing this and in responding properly. From the standpoint of aircraft security alone, leaving one flight attendant to deplane upwards of 130 or more passengers at an intermediate stop, as Petitioner seeks, contravenes TSA/FAA security guidance and is not in the public interest.

Because this Petition seeks what amounts to a change in FAA interpretation and application of 121.391(a) and 121.393(b), AFA is also requesting that the FAA extend the deadline for this comment period to allow time for additional research on this issue that was precluded by the very short time period allotted for comments on this petition.

AFA opposes this Petition for Partial Exemption and for the above reasons, urges the FAA to deny it in full.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Christopher J. Witkowski". The signature is fluid and cursive, with a large loop at the end of the last name.

Christopher J. Witkowski
Director
Air Safety, Health and Security Department