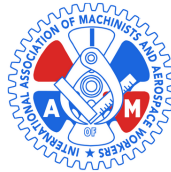


OFFICIAL COMMENTS

*Association of Flight Attendants-CWA
Association of Professional Flight Attendants
Communications Workers of America
International Association of Machinists and Aerospace Workers*



**RE: DOCKET NO. FAA-2025-0934; A4A PETITION
FOR EXPEDITED EXEMPTION FROM 14 C.F.R. §§
121.313(L), 121.401(A) AND 121.584(A)(3)**

JUNE 23, 2025

U.S. DEPARTMENT OF TRANSPORTATION
DOCKET OPERATIONS
WEST BUILDING GROUND FLOOR, ROOM W12-140
1200 NEW JERSEY AVENUE, SE
WASHINGTON, DC 20590

On behalf of over 85,000 Flight Attendants at 22 carriers, we are writing in strong opposition to the Airlines for America (A4A) Petition for Expedited Exemption to delay use of Installed Physical Secondary Barriers (IPSB). The FAA issued the final rule that implements Section 336 of the FAA Reauthorization Act of 2018 to require the “installation and use of an IPSB that will be deployed (closed and locked) whenever the flightdeck door is opened while the airplane is in flight.”¹ When the flightdeck door is opened for operational reasons, the flightdeck is vulnerable. Installation and use of IPSB will delay an attack sufficiently to allow the door to be closed and locked before an attacker can gain access to the flightdeck

This final rule affects commercial passenger transport airplane operators in the United States regulated under title 14 of the Code of Federal Regulations (14 CFR) part 121. The rule requires “operators to use the IPSB, when installed, as part of their procedures for opening the flightdeck door. Affected operators must comply with this rule when operating transport category airplanes manufactured two years after the effective date of this final rule.”² As the rule was published August 25, 2023, the compliance date of August 25, 2025 is fast approaching.

Flight attendant IPSB training can be accomplished to enable immediate use after August 25, 2025

In its petition, A4A states that

“While a small portion of an operator’s fleet will consist of aircraft delivered after August 25, 2025 with IPSB installed, regulations mandate that crewmembers assigned to these aircraft must be trained prior to operation on such aircraft. This is 10’s of thousands of crewmembers for a small number of aircraft.”

In its summary, A4A requests that its members be allowed to operate aircraft without deployment of an installed IPSB until operators have completed the required training of all subject personnel.

This A4A contention that *all* crewmembers of the operator must be trained in the deployment of IPSB before *any of them* can be utilized is at odds with recent experience at some carriers. Pre-departure training of narrowly selected Flight Attendants is easily provided until appropriate initial and recurrent safety training cycles through the entire workforce. This process has successfully trained crews to competence on an expedited basis.

For example, the FAA mandated that Alaska Airlines require its Flight Attendants to complete Supplemental Ditching Training (SDT).³ This training was to be completed by July 31, 2024, for all active Flight Attendants who had a scheduled flight before that date. Flight Attendants on a

¹ 88 FR 41295, June 26, 2023. Available at <https://www.federalregister.gov/documents/2023/06/26/2023-13071/installation-and-operation-of-flightdeck-installed-physical-secondary-barriers-on-transport-category>

² Id.

³ More clarity on this requirement is provided by the FAA in InFO 24015, *Crewmember Emergency Training*, published Dec. 3, 2024, which explains the “emergency drill requirements related to ditching, specifically how an air carrier complies with a ditching drill required by Title 14 of the Code of Federal Regulations (14 CFR) part 121 § 121.417.” Available at https://www.faa.gov/other_visit/aviation_industry/airline_operators/airline_safety/info/all_infos/InFO24015.pdf

Leave of Absence or who did not have scheduled duty until after July 31, 2024, were required to complete the training before their first flight after that date.⁴

The SDT was designed to take around 40 minutes or less and included:

- In-person hands-on drill (the SDT drill).
- Watching and acknowledging a specific video.
- Completing a Computer Based Training (CBT) module for SDT.

Any Flight Attendant who had sequences on their schedule reported for or released from duty for scheduled flying or airport standby between July 17, 2024 and July 31, 2024, but did not complete the SDT drill by July 31, 2024, were required to coordinate with their inflight supervisor to schedule the SDT drill prior to their first trip in August, 2024. A similar SDT program was required and successfully completed at American Airlines in 2024 to ensure that all of its Flight Attendants completed the training.⁵

In July 2024, the FAA mandated that American Airlines require its Flight Attendants to complete *Special Training: Planned Ditching Checklist* by November 15, 2024, for all active Flight Attendants who had duty scheduled before that date. This training amendment was required for all Flight Attendants who had already completed their annual continuing qualification (CQ) training requirement between April and July 16, 2024. A Flight Attendant on a Leave of Absence was required to complete the training at their domicile or at the American Airlines Training Center in DFW before their first duty period.

The *Special Training: Planned Ditching Checklist* consisted of:

- An in-person, hands-on, instructor-led workshop conducted at each domicile, blocked at 75 minutes but designed to take 30 minutes
- No additional Web-Based Training (WBT) modules to complete

Voluntary workshops were held in August at ten domicile cities. The remaining Flight Attendants bid, or were drafted, for workshops in September and October. Training for 8,900 Flight Attendants was completed between mid-August and October with very few exceptions.

But the above special SDTs were for training that was required for the entire workforce. The burden of training becomes far less when targeted for specific crewmembers who have not yet been trained, but are scheduled to work the new equipment.

With respect to IPSB training, this protocol could be implemented to ensure that those Flight Attendants who required it would be trained on deployment and stowage of the IPSB prior to departure on any newly manufactured aircraft delivered after August 25, 2025. As part of such training, it is our understanding that at least one original equipment manufacturer (OEM) has a

⁴ AFA LOA 2024-07-16, *LETTER OF AGREEMENT between ALASKA AIRLINES, INC. and the ASSOCIATION OF FLIGHT ATTENDANTS-CWA, AFL-CIO, SUPPLEMENTAL DITCHING TRAINING*, July 16, 2024. Available at <https://afaalaska.org/wp-content/uploads/2024/07/AFA-LOA-2024.07.15-Supplemental-Ditching-Training-FINAL.docx-1.pdf>

⁵ Personal communication with APFA, June 23, 2025.

video that could be used for the computer-based portion of the IPSB training. In addition, per the Air Line Pilots Association (ALPA), both major OEMs have provided reference materials on the operation of the IPSBs being installed.⁶

Apart from operators adding IPSB training to ongoing initial and recurrent training as soon as possible and providing computer-based training to all crew members, those Flight Attendants who will not have yet received full IPSB training could be trained on IPSB mockups at the airports of IPSB aircraft departure or on the IPSB aircraft itself prior to departure on that aircraft. It is important to note that in reviewing anticipated deliveries of new aircraft, it appears that up to an average of 29.33 new IPSB aircraft spread across 8 U.S. airlines per month may be delivered from August 25, 2025 to February 28, 2027. Here is a [link](#) to the Association of Flight Attendants-CWA (AFA's) spreadsheet projecting airline deliveries for that 18 month period.⁷ This appears to be a manageable number of new aircraft for each airline to ensure that IPSB training is completed for crew assigned to each new IPSB aircraft.

Based on AFA's work on the issue of training for IPSB designs, hands-on training should include deploying and securing the IPSB in place, and then stowing the barrier under normal securing procedures. Training should also include hands-on procedures for securing the IPSB should a malfunction occur in flight. In general, hands-on training of IPSB must be provided in a realistic representation of the cabin environment and include at minimum the following elements:

1. Preflight in stowed position;
2. Unlatching from stowed position, extending and attaching in deployed position;
3. Unlatching from deployed position and re-stowing and latching; and
4. Stowage or removal in the event of inflight barrier malfunction.

In a manner similar to the-previously-described SDT at Alaska Airlines prior to flight, the IPSB training could be accomplished with a simulated airport mock-up, or on the new aircraft with IPSB and overseen/certified by a check flight attendant, flight attendant instructor, or supervisor.

Public Interest

It is clearly in the public interest for the FAA to deny the requested A4A Petition for Expedited Exemption. For aircraft manufactured after August 25, 2025 with an IPSB, Flight Attendants can be properly trained at any time prior to departure on the relatively small number of IPSB-equipped aircraft in their fleet, even if they have not yet been so trained in recurrent or initial training.

There can be no justification for allowing airlines to leave any properly functioning IPSB unused. A single successful terrorist attack on an aircraft with an unused IPSB would be inexcusable

⁶ Personal communication with ALPA, June 15, 2025.

⁷ Only United's numbers include real projected aircraft deliveries. The other 7 airline numbers are based on contractual orders. There could be fewer actual deliveries, but we would not expect there to be more. Manufacturer-sourced numbers include all actual deliveries of commercial aircraft since the beginning of 2025. Deliveries outside the United States are a significant portion of these deliveries. This list does not include CRJ550 conversions, though some airlines may include these in their order books. Estimates based on projected contractual deliveries of aircraft reported in 10-K 2024 and 10-Q 2025 financial releases of respective airlines. Reports available at <https://www.sec.gov/edgar/search/#>.

and certainly not in the public interest. From an economic standpoint, based on the cost benefit analysis for this rule, if only one successful 9/11 type terrorist attack occurred every 151 years, the benefits of IPSB would essentially equal the costs.⁸ This analysis, of course, assumes that IPSB, once installed, is actually put to proper use, and not “kept on the shelf” by dubious arguments over a purported inability to train crewmembers.

Comments submitted by:

Association of Flight Attendants-CWA (AFA)

Association of Professional Flight Attendants (APFA)

Communications Workers of America (CWA)

International Association of Machinists and Aerospace Workers (IAM)

⁸ 88 FR 41295, June 26, 2023, p. 41302.