

**BEFORE THE
FEDERAL AVIATION ADMINISTRATION
U.S. DEPARTMENT OF TRANSPORTATION
WASHINGTON, DC**

In the Matter of:

**Agency Information Collection Activities:
Requests for Comments;
Clearance of Renewed Approval of Information
Collection: High Density Traffic Airports;
Slot Allocation and Transfer Methods**

Docket FAA–2021–0067

COMMENTS OF AIRLINES FOR AMERICA

Communications with respect to this document should be addressed to:

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May 17, 2021

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Airlines for America (“A4A”) appreciates the opportunity to comment on behalf of its members¹ in response to the Federal Aviation Administration’s (“FAA”) information collection approval renewal, Slot Allocation and Transfer Methods (“Notice” or “ICR”).² A4A members have a significant interest in this ICR as they are the largest slot holders and understand the burdens of information collection required for slot transfers. The Notice requests comments on all aspects of the slot acquisition and transfer information collection process, these comments focus on one area; a simplified process for managing the slot holdings of carriers with combined inventory and marketing control.to reduce regulatory and paperwork burdens. In addition, we provide data that more accurately reflects the burdens of this information collection and provides support for reducing burdens. A4A members greatly appreciate the positive working

¹ A4A’s members are Alaska Airlines, Inc.; American Airlines Group, Inc.; Atlas Air, Inc.; Delta Air Lines, Inc.; Federal Express Corp.; Hawaiian Airlines; JetBlue Airways Corp.; Southwest Airlines Co.; United Airlines Holdings, Inc.; and United Parcel Service Co. Air Canada is an associate member.

² 86 Fed. Reg. 14515 (March 16, 2021).

relationship that the FAA slot office has with carriers and look forward to continued collaboration.

Reducing Information Collection Burdens

Under the current Temporary Orders governing New York LaGuardia (“LGA”) and John F. Kennedy (“JFK”) Airports and the High Density Rule governing Washington National Airport (“DCA”), slots are frequently transferred among various carriers operating on behalf of a marketing carrier. Some of the operating carriers are commonly owned while others are contracted service providers. While these carriers operate under their own DOT and FAA operating authorities and communicate with ATC using their unique call signs, FAA has required marketing carriers to certify they have the proper slot authorizations in order to transfer slots among carriers operating on their behalf. This process is overly burdensome, fails to recognize the reality of a coherent network of mainline and regional partner airlines, and requires the generation of tens of thousands of transfer messages annually by the industry to the FAA.

We respectfully request a different and simplified information collection process for managing the slot holdings of carriers with combined inventory and marketing control to drastically reduce information collection burdens. The marketing and operating carriers would provide advance information to the FAA which would include the planned airports, and the flight number ranges that would be used for marketing and ATC purposes. After the operation, the marketing carrier would typically report usage of the slot in compliance with FAA requirements, unless otherwise noted. Carriers would have the option to continue the process of transferring slots to the operating carrier, if they so choose.

This simplified process will reduce the administrative burden on the FAA, on carriers, and their regional partners. We understand that making this change may require different

processes for DCA versus JFK and LGA, but we kindly ask that you consider the most expedient process for each airport to reduce these burdens as soon as possible. We support moving forward with these changes even if all airports cannot be implemented at the same time.'

The Burdens are Grossly Underestimated

The FAA estimates a total annual burden of 5602.6 hours for the following activities at DCA, JFK, and LGA: (1) Written consent and requests for confirmation of slot transfers; (2) slots required to be returned and slots voluntarily returned; for DCA and LGA, (3) requests to be included in a lottery for the permanent allocation of available slots; (4) reports on usage of slots on a bi-monthly basis; for DCA (5) requests for slots in low-demand hours or other temporary allocations, for JFK (6) requests for seasonal allocation of historic and additional available slots; (7) reports on usage of slots on a seasonal basis; and (8) changes to allocated slots.

We conducted a survey of members to determine the actual number of slot transfers between operating and marketing carriers at DCA, LGA, and JFK for the month of July 2019, and found there were 36,180 such slot transfers. There were 14,125 slot transfers at DCA, 14,897 slot transfers at LGA, and 7,158 slot transfers at JFK, this is aggregated data, not estimates. The JFK number is reduced because JFK was under construction in July 2019 and a significant number of slots were returned to FAA to mitigate delays due to construction. July 2019 is therefore a good proxy for slot transfer information collection burdens, given the substantially reduced number of slots during this time. If you were to extrapolate the number of operating/marketing carrier slot transfers using FAA's estimate of 6 minutes per slot transfer, this results in 3,618 hours for the month of July 2019 or an annual burden of 43,416 hours or more than 770% of FAA's burden estimate. FAA's estimated annual burden would result in

more than 2 full time equivalents (FTEs) and more than 20 FTEs based on our survey results, which drives substantial wages and benefits costs.

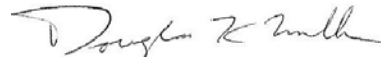
FAA is capable of reducing these information collection burdens because there are no similar operating authorization information collection transfer requirements at Level 2 airports. FAA has found a way to understand who is operating which flights at the Level 2 airports, which include some of the most complex operations in the U.S., including Chicago O'Hare International Airport (ORD), Los Angeles International Airport (LAX), Newark Liberty International Airport (EWR) and San Francisco International Airport (SFO). The FAA should consider using the approach used for Level 2 airports for Level 3 airports to reduce information collection burdens.

The changes we suggest would not only reduce burdens on the industry, but also reduce burdens on the FAA. They would also be consistent with the Paperwork Reduction Act and the related U.S. Department of Transportation policies, including minimizing paperwork burdens for individuals, minimizing the cost to the Federal Government, and ensure that information technology is acquired, used, and managed to improve performance of agency missions, including the reduction of information collection burdens on the public, and to increase program efficiency and effectiveness.³

³ See 44 U.S.C. §§ 3501(1), (5), and (10) and DOT Order 1351.29 ¶ 29.4.5 (2017) (CIOP Chapter 1351.29, Paperwork Reduction Act (PRA) and Information Collection (IC)).

We thank the Office of Management and Budget and the FAA for this opportunity to recommend these improvements and look forward to working with the FAA to find slot transfer solutions.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Doug Mullen", written over a horizontal line.

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Dated: May 17, 2021