



## CONTINUATION OF CERTAIN AIR SERVICE

Docket DOT-OST-2020-0037

The JetBlue Master Executive Council of the Air Line Pilots Association, International (the MEC) answers in strong support of the May 5, 2020 request of JetBlue Airways Corporation (JetBlue or the Company) for an exemption. As explained in detail by the Company, the routes at issue involve long, thin Western markets that are outside of JetBlue's natural sphere of service, which is centered on the East Coast with primary hubs at JFK and Boston. Requiring JetBlue to continue service to distant Western points for which there is no current demand serves no identifiable public interest purpose, and is putting the financial health of the Company and the physical health of JetBlue pilots at risk.

The MEC appreciates the Department's efforts to strike an appropriate balance between the need to maintain the integrity of the National Air Transportation System, while at the same time allowing carriers the necessary flexibility to reduce services that are not "reasonable or practicable." This has been an iterative process, starting with the

Department's initial Orders,<sup>1</sup> and refining eligibility criteria as operating experience is gained in the Covid19 environment. The MEC applauds the Department's decision to relax exemption criteria for smaller carriers at large hub airports that continue to maintain abundant service and high connectivity.<sup>2</sup>

The MEC respectfully requests the Department to apply similarly relaxed exemption criteria to allow smaller carriers to be exempted from markets where (i) there is a proven insufficiency of demand, (ii) adequate service levels will be maintained by other carriers, and (iii) the point is more than 1,000 miles from a smaller carrier's primary hub. Doing so will not only benefit smaller carriers that are unfairly burdened by such service; it will also benefit the remaining carriers by allowing them to capture a larger share of the extremely limited demand that exists in today's environment.

The MEC therefore urges that five Western airports where the Company has requested exemptions (Albuquerque, Bozeman, Palm Springs, Reno and Sacramento) be granted such relief. Due to exceedingly low loads<sup>3</sup> JetBlue has been forced to implement undesirable and inefficient "tag" operations on its transcon flights to maintain required minimum service levels at these points. This degrades the quality of

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<sup>1</sup> Order 2020-3-10; Order 2020-4-2.

<sup>2</sup> Cape Air NOAT; Spirit NOAT; Frontier NOAT; JetBlue NOAT.

<sup>3</sup> Generally less than 10 passengers, and sometimes as few as 3 per flight on 156 seat aircraft. *See*, JetBlue May 5 exemption application.

its nonstop transcon flights, and adds enormously to the cost of operating them, since an entire additional take-off and landing cycle is required.

JetBlue pilots are dedicated professionals and are committed to providing service when and where needed. The MEC is, however, opposed to unnecessary service at unsustainable loads, which only serves to weaken our Company, threatens the long-term viability of pilot jobs, and puts the personal health of pilots at risk.

JetBlue pilots have risen to the occasion to keep passengers, vital medical personnel and supplies moving throughout the United States. It bears note that JetBlue's largest hub and headquarters are in New York, which lies at the epicenter of the Covid19 crisis. The Company, together with the pilots that operate these critical flights, have gone above and beyond in the line of service<sup>4</sup> and to honor and appreciate our medical professionals.<sup>5</sup>

The personal risk to JetBlue's pilots is no exaggeration. Already across our ranks at ALPA-International nearly 300 of our brethren have been sickened and three have died. As reported by the New York Times, just this week, projected mortality rates have nearly doubled to 135,000 Americans.<sup>6</sup> It is one thing to ask pilots to fly in needed service for the Company and the Country. It is quite another to ask pilots to put

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<sup>4</sup> <http://blog.jetblue.com/doingourpart/>

<sup>5</sup> <http://mediaroom.jetblue.com/investor-relations/press-releases/2020/05-06-2020-163003272>

<sup>6</sup> <https://www.nytimes.com/reuters/2020/05/04/us/04reuters-health-coronavirus-usa.html>

themselves at risk for unnecessary flights, for which there is no demand, and which serves to weaken our Company and undermines the long term viability of our jobs.

The JetBlue MEC and the 4,000 pilot members across our ranks remain committed to providing vital and needed services in this time of crisis. For the foregoing reasons, we respectfully request that the Department grant the limited and well justified exemption relief requested by the Company.

Respectfully Submitted,

A handwritten signature in black ink, appearing to read 'Chris Kenney', with a long, sweeping horizontal line extending from the end of the signature.

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Chris Kenney  
Chairman  
JetBlue Master Executive Council  
Air Line Pilots Association, International

### CERTIFICATE OF SERVICE

I, Antoinette Cleveland, hereby certify that on May 8, 2020, the foregoing document was served on the following persons via email in accordance with the Department's Rules of Practice:

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