



Airline Dispatchers Federation
2020 Pennsylvania Avenue, NW #821
Washington, D.C. 20006

August 3, 2020

Via email transmission

Administrator Steve Dickson
Federal Aviation Administration
800 Independence Avenue, SW
Washington, D.C. 20591

Re: Request to cease approval allowing CFR 14 Part 121 Dispatching from Home

Dear Administrator Dickson:

The Airline Dispatchers Federation stands in strong opposition to the recent approval granted to CFR 14 Part 121 Carriers allowing FAA Certificated Aircraft Dispatchers to work from home while exercising joint operational control. We fully understand and support air carriers looking for creative solutions to address unimagined challenges, however, dispersing Aircraft Dispatchers from a secure centralized facility to isolated and potentially unsecured private dwellings introduces a level of risk that is unacceptable.

This move is contrary to best practices established to ensure the highest level of aviation safety. The compromise to DRM and situational awareness, two elements critical to safe, efficient, and timely decision making, is insupportable. Basic fundamental functions are compromised enough to jeopardize safety. Concerns include security, inadequate back up support, internet and communications suitability and continuity, distraction management and lack of rapid and reliable access to additional personnel and resources. The risk of complacency increases without the sensory input from the activity of the Dispatch office. Distraction has been listed as the number one concern on the NTSB's Most Wanted Top Ten List. The number of potential distractions increases exponentially with the Dispatch from home model.

In an effort to limit Covid-19 exposure and ensure employee health and safety, some of our nation's major airlines have investigated this option and have come to the conclusion it is simply not feasible to ensure airlines can operate with an acceptable level of safety with Aircraft Dispatchers working from home. It is hard to understand how appropriate SMS evaluations, trials and testing would come to a different conclusion.

We ask the FAA to reconsider its support of this practice. Much like a flight in crisis, during challenging times we need to refocus on established best practices and protocols that support safest operations. Understanding we are in an extraordinarily challenging place; this is not the time for compromise.

The Airline Dispatchers Federation is adamant in our stance that the practice allowing Certificated Aircraft Dispatchers to exercise joint operational control from home does not support the unparalleled level of safety the American public deserves and has come to expect.

Sincerely,

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About ADF

The Airline Dispatchers Federation is the only national organization representing the professional interests of the Dispatch profession. ADF's constituency is comprised of licensed aircraft dispatchers and operational control professionals from aerospace companies, regional and cargo carriers and every major U.S. airline. ADF's membership as of January 2020 stood at 2,154 members. The vast majority of airline passengers traveling each day in the United States, do so under the watchful eye of ADF members.