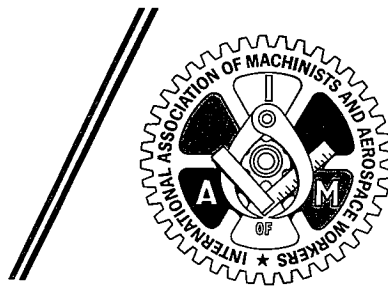


**International  
Association of  
Machinists and  
Aerospace Workers**



9000 Machinists Place  
Upper Marlboro, Maryland 20772-2687

Area Code 301  
967-4500



OFFICE OF THE INTERNATIONAL PRESIDENT

November 20, 2009

The Honorable Raymond H. (Ray) LaHood  
Secretary of Transportation  
U.S. Department of Transportation  
1200 New Jersey Avenue, S.E., 9<sup>th</sup> Floor  
Washington, DC 20590

Mr. J. Randolph Babbitt, Administrator  
Federal Aviation Administration  
800 Independence Avenue, S.W., Room 1010  
Washington, DC 20591

**RE: THE IAM'S STRONGEST URGING FOR  
RECONSIDERATION OF THE FAA DECISION TO DOWNSIZE  
THE AUTOMATED FLIGHT SERVICE STATIONS (AFSS)  
SYSTEM**

Dear Secretary LaHood and Administrator Babbitt:

On behalf of the membership of the International Association of Machinists and Aerospace Workers, (IAMAW), I am writing today to express our gravest concerns about a proposal to further downsize the Automated Flight Service Stations (AFSS) system. We are distressed about the continued downsizing of high wage, high skill jobs at a time in our history when our nation can least afford more job losses, especially when the cuts will endanger public safety and put the safety first reputation of the U.S. air transportation system at risk.

AFSS, an arm of the Air Traffic Control system, provides preflight weather briefings, in-flight radio services, issues notices to airmen (NOTAMs), handles flight plans for general aviation and initiates search and rescue when needed.

AFSS, is the largest non-defense service contract ever awarded by the Federal government. The service contract went to Lockheed Martin in 2005. Lockheed Martin aggressively downsized AFSS from 2,100 employees in 2002 to 810 in 2009 and from 58 facilities in 2005 to 13 in 2009. On November 17, 2009, Lockheed Martin announced the closure of an additional seven facilities across the country. This proposal will bring AFSS down to 600 employees and six facilities, a further reduction of 18 percent.

One need not look far to recognize the importance to the system after the events that occurred yesterday, November 19, 2009, when events led to AFSS Functioning as the backup to Commercial Air Traffic Control (ATC). Flights over much of the eastern United States were delayed by a failure in an ATC communications system. As a result, ATC was unable to accept flight plans from the airlines. This was the fourth major system wide disruption attributed to the

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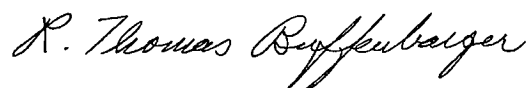
The Honorable Raymond H. (Ray) LaHood  
Mr. J. Randolph Babbitt

communications system, which the Federal Aviation Administration began putting into service earlier in this decade as a way to cut costs and assure reliability. During the four hours that the system was inoperable, AFSS was swamped with calls and flight service specialists picked up the slack and kept traffic moving under the difficult circumstances.

Yesterday's occurrence is just one of several examples that militate our concern. We have attached a thoughtful briefing with more examples entitled "The Case for Safety: AFSS Downsizing Counterpoints". Once again, please find this correspondence as our strongest urging for reconsideration of the FAA decision to downsize the Automated Flight Service Stations (AFSS) SYSTEM.

If you have any questions, please contact Legislative and Political Action Director Matthew McKinnon at (301) 967-4575.

Sincerely,



R. Thomas Buffenbarger  
International President

Attachment

cc: The Honorable John D. (Jay) Rockefeller IV, Chairman  
U.S. Senate Committee on Commerce, Science and Transportation

The Honorable Byron L. Dorgan, Chairman  
Sub-Committee on Aviation Operations, Safety and Security  
Sub-Committee, U.S. Senate Committee on Commerce, Science and Transportation

The Honorable James L. Oberstar, Chairman  
Committee on Transportation and Infrastructure  
U.S. House of Representatives

The Honorable Jerry F. Costello, Chairman  
Sub-Committee on Aviation, Committee on Transportation and Infrastructure  
U.S. House of Representatives



## Background

AFSS, an arm of the Air Traffic Control system, is the largest non-defense service contract ever awarded by the Federal government. The contract went to Lockheed Martin in 2005. AFSS provides preflight weather briefings, in-flight radio services, issues notices to airmen (NOTAMs), handles flight plans for general aviation and initiates search and rescue when needed. Lockheed Martin aggressively downsized AFSS from 2,100 employees in 2002 to 810 in 2009 and from 58 facilities in 2005 to 13 in 2009. On November 17, 2009, Lockheed Martin announced the closure of an additional seven facilities across the country. This proposal will bring AFSS down to 600 employees and six facilities, a further reduction of 18 percent.

## Impact Systemwide

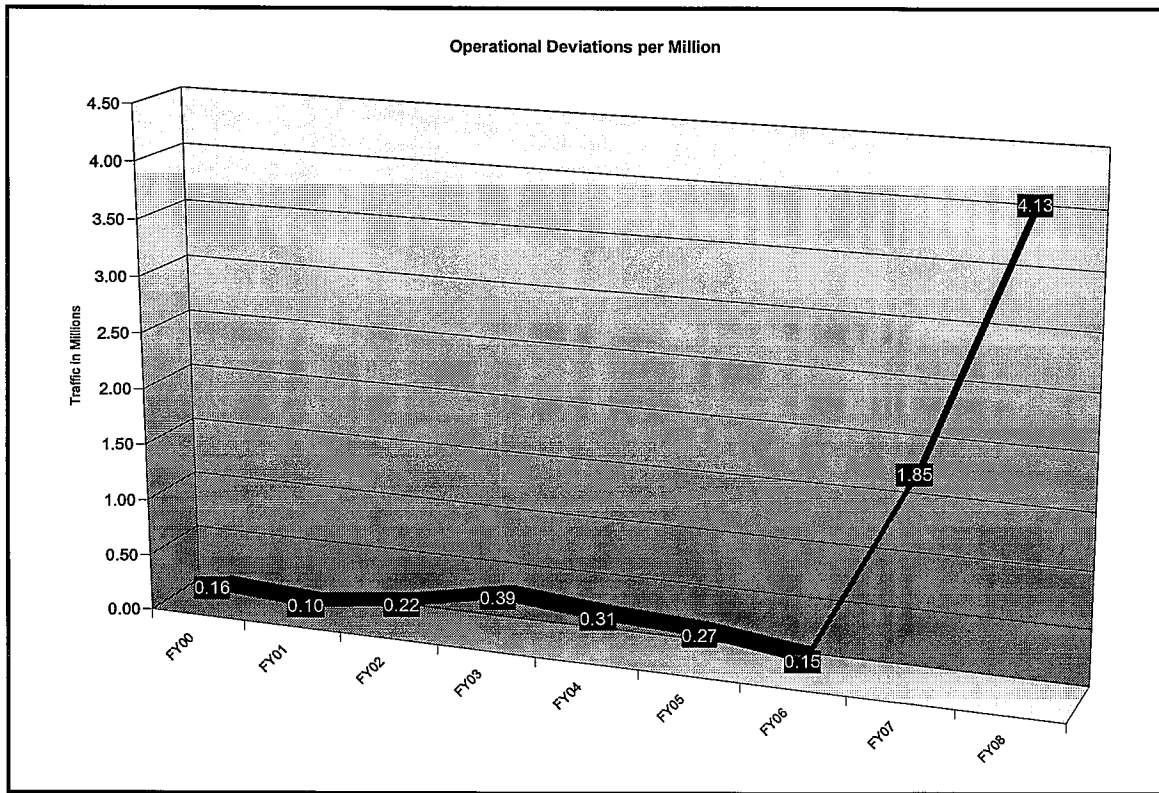
- 1) “C-Site” Employees are the Most Experienced Group of Flight Service Specialists – Most C-Site specialists have more than twenty years on the job. This invaluable institutional knowledge will be lost in the proposed downsizing.
- 2) AFSS Functions as a Backup to Commercial ATC – On November 19, 2009, Flights over much of the eastern United States were delayed by a failure in an ATC communications system. As a result, ATC was unable to accept flight plans from the airlines. This was the fourth major systemwide disruption attributed to the communications system, which the Federal Aviation Administration began putting into service earlier in this decade as a way to cut costs and assure reliability.<sup>1</sup> During the four hours that the system was inoperable, AFSS was swamped with calls and flight service specialists picked up the slack and kept traffic moving under the difficult circumstances.
- 3) Good Jobs are Critical to America’s Future – With billions of dollars going to stimulate the economy and create good paying jobs, it seems the Government’s largest civilian service contract (AFSS at \$2.1 billion) should serve the same goal. Downsizing the AFSS workforce is not about saving the Government money. It’s about increasing profits for the largest Government contractor, Lockheed Martin, which expects to earn \$45.2 billion in 2009 and \$46.9 billion in 2010.<sup>ii</sup>
- 4) Operational Deviations (ODs)<sup>iii</sup> – Since 2000, AFSS traffic has declined and ODs have increased. The trend lines are particularly disturbing since contracting out in October 2005 and especially since “consolidation” in 2007. The following data is taken from the *FAA Administrators Fact Book, Lockheed Traffic Count Reports* (Alaska not included). The report was titled February 2009 Comparison.

# The Case for Safety: AFSS Downsizing Counterpoints

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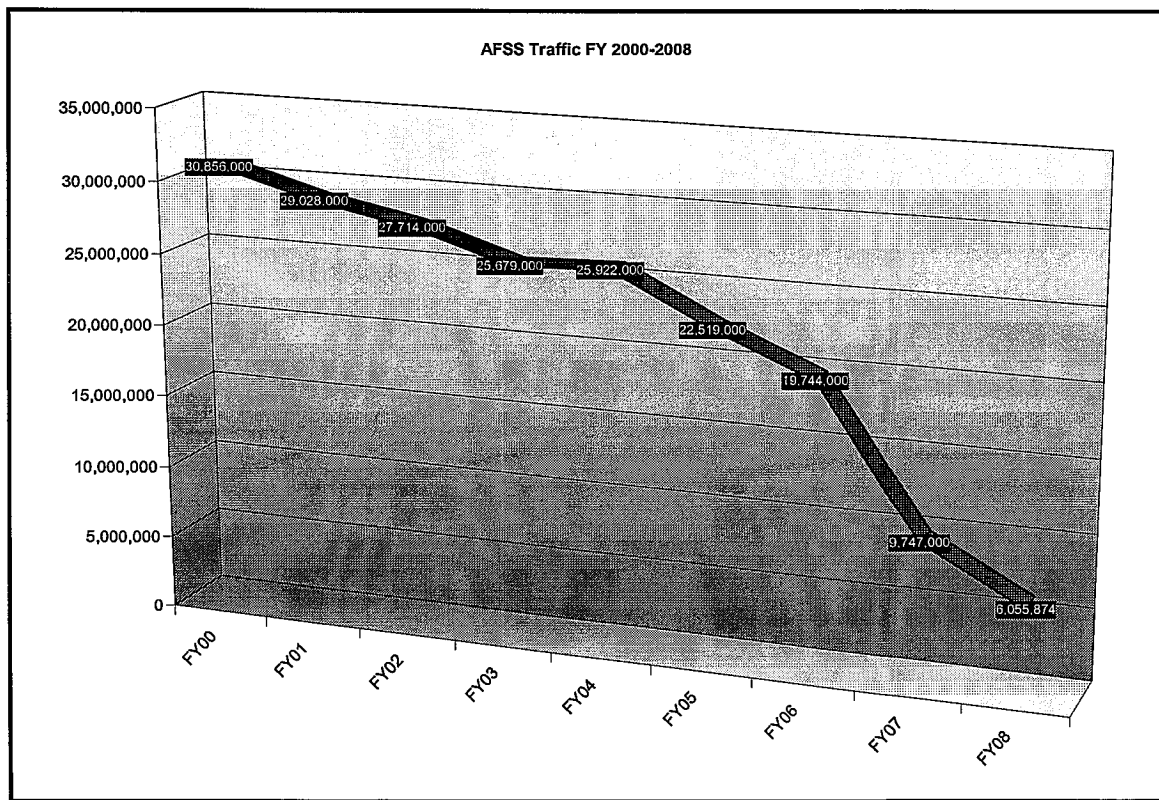
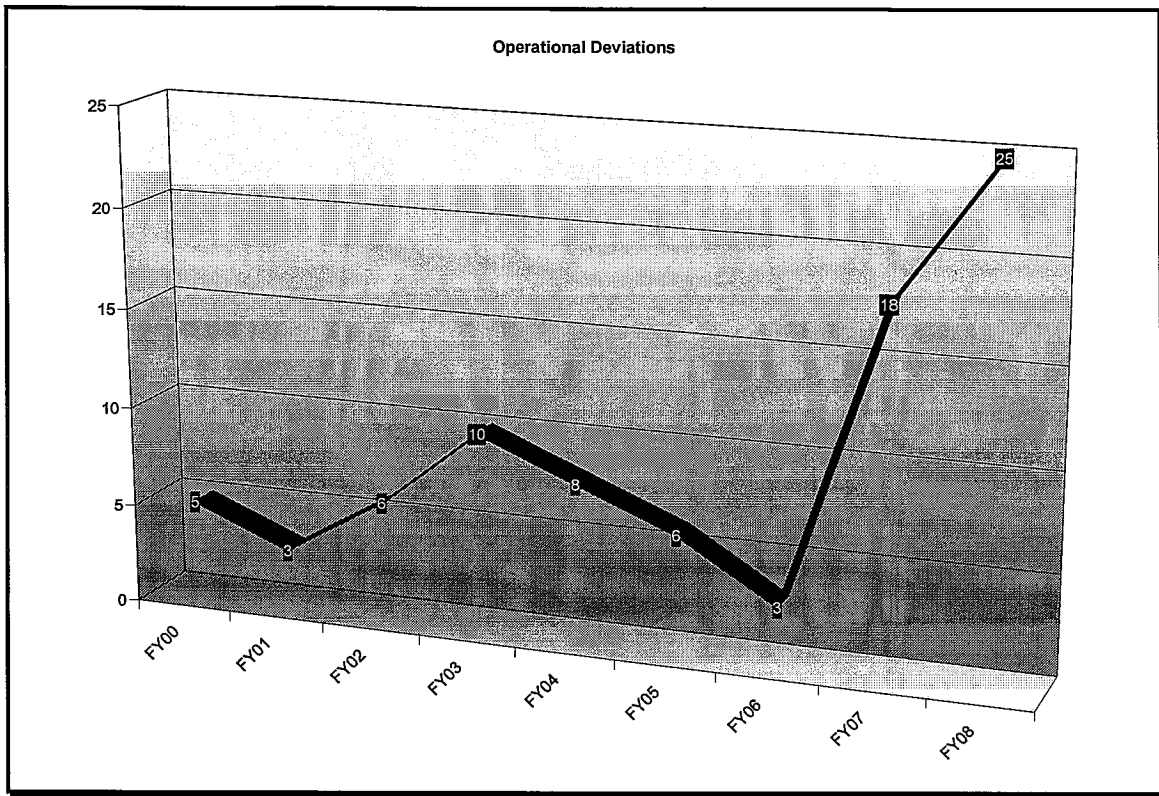


Year	Traffic	O.D.s	Traffic in Millions	O.D.s per Million	Note
FY00	30,856,000	5	30.86	0.16	
FY01	29,028,000	3	29.03	0.10	
FY02	27,714,000	6	27.71	0.22	
FY03	25,679,000	10	25.68	0.39	
FY04	25,922,000	8	25.92	0.31	
FY05	22,519,000	6	22.52	0.27	Contract to Lockheed
FY06	19,744,000	3	19.74	0.15	
FY07	9,747,000	18	9.75	1.85	Consolidation/Relocation
FY08	6,055,874	25	6.06	4.13	



# The Case for Safety: AFSS Downsizing Counterpoints

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- 5) Hubs are Understaffed – The three hubs are barely able to handle the in-flight radio calls and Notice to Airmen (NOTAMS) they are tasked with currently. Removing briefers will only add to waiting times and delays for pilots, especially in the busy summer months.
- 6) AFSS Eastern Service Area to be Overwhelmed – The Eastern Service Area handles as much traffic as the Central and Western Service Areas combined. After downsizing, there will only be three AFSS east of the Mississippi.

## Impact by Site BNA

- 7) Nashville Handles AFSS Overflow Traffic – At Nashville (BNA), a site that Lockheed has proposed to close, 50 percent of briefings over the past three weeks were outside of primary and secondary areas of responsibility (AORs). This means that hubs and other stations were not handling their traffic loads and BNA received their overflow. Should Lockheed Martin be allowed to close facilities while pilots' requests for service are being rerouted to flight service specialists that have neither familiarity nor certification in the area in which the pilot intends to fly?

## Impact by Site LAN & IKK

- 8) Local Area Knowledge for the Great Lakes – The weather patterns in the Great Lakes are the most intricate in the country. With both Lansing and Kankakee closing this will eliminate local area knowledge about Great Lakes flying and weather patterns, for instance, lake effect snow. It is not reasonable to expect a briefer in North Carolina or Miami to be familiar with the level of detail necessary to provide safe and dependable briefing over the Great Lakes.
- 9) Lansing Handles Overflow – A considerable percent of the calls handled at Lansing are from across the country well outside LAN primary briefing areas. The pilots are not happy with this situation and the loss of local knowledge. The proposed downsizing will further remove pilots from local knowledge as calls are taken in North Carolina and Minnesota.
- 10) Lansing Briefs for Northeast Flight Plan Area – A general aviation pilot depends on Lansing for information on the Hudson River new Special Flight Rules Area/New York Class B airspace as well as the Boston area and mountain flying. The Lockheed alternative: A complex Flight Plan that has bounced between unfamiliar briefers.
- 11) Oshkosh Air Show – This annual event, which usually draws between 200,000 to 300,000 people and 10,000 to 15,000 aircraft, has always been primarily supported by Lansing and Kankakee AFSS.

# The Case for Safety: AFSS Downsizing Counterpoints

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- 12) Temporary Flight Restrictions – The nationwide plotting chart for TFR is produced by Lansing AFSS. Backup plans, if they exist, have not been shared with the workforce.

## Impact by Site SEA

- 13) 2010 Winter Olympics in Vancouver/Whistler, BC – There will be substantially increased air travel through Seattle and the western United States into Canada. The Seattle facility has unique knowledge of and experience with Canadian counterparts of FAA and FSS. The Seattle facility briefs most of western United States with local area knowledge that a hub based in Prescott, Arizona or Fort Worth, Texas does not have. According to an FAA Flight Advisory recently issued, pilots will be extremely limited in where and how they can fly, and accurate, timely briefings will be crucial to protect US pilots and US airspace. (See current FAA Flight Advisory.)<sup>iv</sup>
- 14) SEA Local Area Knowledge is Critical to Safety – Northwest pilots prefer Seattle briefings due to knowledge of weather conditions and geography. Briefers at hubs located thousands of miles away in Prescott, AZ; Fort Worth, TX; and Washington, DC lack expertise of unique Northwestern weather, airports, geography, and international procedures.
- 15) SEA is a Backup to the Prescott Hub – Seattle is the only facility in the Western Service Area that can back up the Arizona hub. When Seattle is closed and, in the event of a hub failure in Arizona, Western flight services are at risk.

# The Case for Safety: AFSS Downsizing Counterpoints

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## ENDNOTES

<sup>i</sup> *The New York Times*, November 20, 2009, [F.A.A. Computer Problem Snarls Flights](#), Matthew L. Wald

<sup>ii</sup> *Business Week*, Earnings & Estimates Summary - Lockheed Martin Corporation (LMT), November 20, 2009, <http://investing.businessweek.com/research/stocks/earnings/earnings.asp?ric=LMT>

<sup>iii</sup> Operational Deviations (ODs) An occurrence attributable to an element of the air traffic system in which applicable separation minimum as required by FAA Order 7110.65 or other national directive was maintained, but:

(1) Less than the applicable separation minima existed between an aircraft and adjacent airspace without prior approval; or

(2) An aircraft penetrated airspace that was delegated to another position of operation or another facility without prior coordination and approval; or

(3) An aircraft penetrated airspace that was delegated to another position of operation or another facility at an altitude or route contrary to the altitude or route requested and approved in direct coordination or as specified in a letter of agreement (LOA), pre-coordination, or internal procedure; or

(4) An aircraft is either positioned and/or routed contrary to that which was coordinated individually or; as specified in a LOA/directive between positions of operation in either the same or a different facility; or

NOTE: Does not apply to inter/intra-facility traffic management initiatives.

(5) An aircraft, vehicle, equipment, or personnel encroached upon a landing area that was delegated to another position of operation without prior coordination and approval.

<sup>iv</sup> Due to the Vancouver 2010 Winter Olympics and Paralympics Games, the FAA at the request of the Department of Homeland Security and Department of Defense as part of the airspace security measures will be placing restrictions and procedures in northwest Washington State to complement Canadian restrictions and procedures. The restrictions will coincide with the opening and closing of the Athlete Villages in Vancouver and Whistler, BC: January 29, 2010 to March 24, 2010. Additional NOTAMs may be issued and it is recommended that operators check NOTAMs frequently.

Pursuant to 49 USC 40103(B), The Federal Aviation Administration (FAA) classifies the airspace defined in the published NOTAM as "National Defense Airspace". Any person who knowingly or willfully violates the rules concerning operations in this airspace may be subject to certain criminal penalties under 49 USC 46307.