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Office of the Air Transport Territory General Vice President

November 25, 2025

Anthony M. Butters, Manager
Airport Safety Policy Branch, Office of Airports, Safety and Standards
Federal Aviation Administration
800 Independence Avenue, SW
Washington, DC 20591

RE: Agency Information Collection Activities: Requests for Comments; Clearance of a New Approval of Information Collection: Section 353 Survey to Evaluate Airport Ramp Worker Safety Docket No. FAA-2025-1704

Mr. Butters:

On behalf of the 600,000 active and retired members of the International Association of Machinists and Aerospace Workers (IAM Union), the largest air transport union in the United States, I write to you today in response to the formal request for public comments regarding a survey by the Federal Aviation Authority (FAA) to evaluate airport ramp worker safety.

The IAM Union is a staunch advocate for improving the health and safety of ramp workers, who make up a large portion of the 100,000 members we represent in air transport. We strongly endorsed the FAA Reauthorization Act of 2024 (H.R. 3935), now law, which includes the provision that set a ramp worker safety "call to action." This directs the agency to bring stakeholders together to share best practices and implement actions to address airport ramp worker safety and ways to minimize or eliminate ingestion zone and jet blast zone accidents.

This call to action is much needed, as ramp workers face dangerous working conditions across various roles. We've witnessed the steady string of such tragic events for years. This year is no different, as we've witnessed increased incidents like in February, an IAM member employed by United Airlines was seriously injured in a collision between a plane and a tug vehicle, a tragic incident that came just days after an IAM member employed by American Airlines was killed at Charlotte Douglas International Airport after being hit by an aircraft tug on the tarmac.

These are just a snapshot of what is a growing number of tragic incidents impacting ramp workers across the country. We believe the number of injuries is rising because the system is stretched, disorganized, and overly focused on operational performance rather than safety. There are also communication lapses, equipment issues, inconsistent training, weak accountability, and ignored hazards that contribute directly to preventable events.

We see the FAA's proposed voluntary questionnaires as a good step forward toward improving safety, but there needs to be greater data capture and a broader research scope to ensure improvements for all ground workers. For that, I want to highlight the IAM Union Reporting System, which has been

instrumental in our union's push for improving the health and safety of the air transport workers we represent.

The IAM Union Reporting System was developed under the leadership of International President Brian Bryant and General Vice President Richie Johnsen, in close coordination with safety representatives, data experts, and labor stakeholders. Built over two decades, it stands as a nationally recognized platform for capturing, analyzing, and applying occupational safety data to protect workers on the ramp and in airline maintenance roles.

Unlike isolated surveys, the IAM Union Reporting System is a comprehensive, operational tool. It collects OSHA logs from major U.S. airlines as required under OSHA regulations and integrates this with member-submitted reports. Each incident record includes detailed information on equipment, accident location, causation, and severity. There are additional features that further create data integrity and transparency through what we call "Information Equality."

This platform supports:

1. **Industry-wide trend identification** across injury types, accident locations, and root causes
2. **Predictive modeling** to preempt emerging hazards
3. **Real-time problem solving** through targeted safety interventions
4. **Secure information sharing** with IAM Union districts and locals to scale best practices

What sets our platform apart is its actionable scope—it goes beyond counting incidents to driving real change: revised safety protocols, improved equipment standards, and enhanced worker training. It should also be noted that ground handling is the only sector of aviation without a federal oversight standard.

Our goal is straightforward: to improve worksite safety for all through data-driven analytics and shared data. We believe this IAM model could serve as a valuable asset to the FAA's ramp safety initiative and would welcome the opportunity to present the IAM Union Reporting System to your team. We're also happy to arrange a discussion with the IAM Air Transport Territory that helped build this initiative alongside International President Bryant and General Vice President Johnsen.

We join other labor unions with suggestions that there needs to be a broadened scope of respondents, in addition to measures to ensure anonymity of workers who participate, allowing them to speak truthfully without fear of being retaliated against by their employer.

Thank you for your leadership on this issue. We look forward to exploring meaningful collaboration to protect the safety and dignity of all ramp workers.

Best,

A handwritten signature in black ink, appearing to read "Richie Johnsen", with a long horizontal flourish extending to the right.

Richie Johnsen
GENERAL VICE PRESIDENT