



March 23, 2026

Docket Operations, M-30
U.S. Department of Transportation (DOT)
1200 New Jersey Avenue SE, Room W12-140, West Building Ground Floor
Washington, DC 20590-0001
(Submitted Electronically to Regulations.gov and Reginfo.gov)

Re: Docket No. FAA-2025-1704, Section 353 Survey to Evaluate Airport Ramp Worker Safety

Airports Council International-North America (ACI-NA) is pleased to submit these comments regarding the FAA's proposal for information collection efforts to evaluate airport ramp worker safety in accordance with Section 353 of the *FAA Reauthorization Act of 2024*.¹ An initial notice and request for comments regarding this FAA information collection activity was published by the Federal Aviation Administration (FAA) on September 24, 2025.² A second notice and request for comments was published on February 20, 2026.³

ACI-NA represents entities that own and operate commercial service airports in the United States and Canada. Our more than 300 member airports are proud to work alongside FAA to ensure the safe, secure, and efficient movement of goods and passengers across our country and the world. ACI-NA supports the Federal Aviation Administration's efforts to improve airport ramp worker safety and reduce accidents related to ingestion zones and jet blast zones. We also understand the FAA's need to collect information that supports these goals. However, we also believe that the collection effort outlined in the two Federal Register notices requires additional details to facilitate airport and aviation industry review and support.

Specific areas where we believe additional information is required regarding this proposed data collection effort are as follows:

- Sample sizes for the data collection effort should be sufficient for the statistical analyses plans to perform on the data as well as the conclusions FAA expects to utilize the data to support. We are concerned that the FAA's estimate of 100 responses across an array of different airports, positions, experience levels, and organizations will be insufficient for meaningful analyses or conclusions. Such a small sample size increases the risk of biased responses from those that may have specific agendas or outcomes they would like to see from this data collection effort. Accordingly, we request that the FAA review its sampling plan and assess the number of responses that will be necessary to provide meaningful insight into ramp safety issues.

¹ *FAA Reauthorization Act of 2024*, Pub. L. No. 118-63, 138 Stat. 1112-1113 (2024).

² 90 Fed. Reg. 46457 (Sept. 26, 2025).

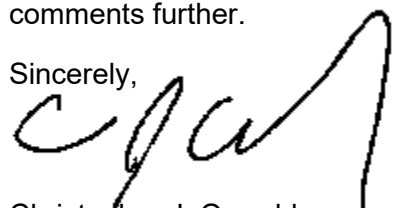
³ 91 Fed. Reg. 8294 (Feb. 20, 2026).

- The notice does not specify how and by whom data collection efforts will be implemented. We urge the FAA to provide details about how it will implement its data collection efforts and the role that it expects airport sponsors to play in this process.
- Safety data sensitive information, particularly for flight operators, and the FAA should address how the identity of respondents and the data they provide will be protected from inappropriate disclosure. Without such protections, we believe it will be difficult to collect reliable data in this effort.
- Finally, the notice does not discuss the data collection instrument itself. We believe that the effort would benefit from the FAA engaging key industry stakeholders—including airport operators, airlines, and third-party ground handlers—in the review of the data FAA plans to collect and the survey questions and other means FAA plans to utilize to collect it.

* * * * *

ACI-NA appreciates this opportunity to provide comments on the FAA's proposed survey to evaluate airport ramp worker safety. We are committed to working with FAA to continue to enhance safety at our nation's airports. Please contact me if you have any questions or would or comments further.

Sincerely,



Christopher J. Oswald
Senior Vice President, Safety & Regulatory Affairs

cc: Kelvin K. Ampofo, Acting Manager-Airport Safety & Operations, FAA