

June 13, 2023

The Honorable Maria Cantwell
Chair
Senate Committee on Commerce, Science
and Transportation
U.S. Senate
Washington, DC 20510

The Honorable Ted Cruz
Ranking Member
Senate Committee on Commerce,
Science, and Transportation
U.S. Senate
Washington, DC 20510

Dear Chair Cantwell and Ranking Member Cruz:

As you prepare to markup Federal Aviation Administration (FAA) reauthorization legislation, we strongly urge you to raise the FAA's mandatory retirement age for commercial airline pilots from 65 to 67. Thousands of highly skilled and experienced pilots exited the industry during the pandemic, primarily at the largest airlines, exacerbating an existing pilot shortage. These airlines replenished their pilot workforce by hiring pilots in unprecedented numbers from smaller air carriers that provide air service to small-and medium-sized airports. Without a sufficient supply of pilots, service to these airports has collapsed across the country despite robust passenger demand. Raising the retirement age is the only near-term solution that will help restore air service and provide time for longer-term workforce solutions to take effect.

Congress increased the retirement age from 60 to 65 in 2007, with no negative impact on aviation safety. Existing regulations require two pilots on the flight deck, and no other profession is assessed as extensively or frequently as pilots who must undergo mandatory medical examinations every six months and with an EKG every 12 months. All pilots have their skills regularly evaluated in flight simulators to ensure proficiency, utilizing historic data to present almost every kind of dangerous scenario a pilot could face. Additionally, Part 135 operators are not subject to a retirement age, and pilots over the age of 65 are currently providing safe, scheduled, passenger service safely through the Essential Air Service Program.

Absent immediate policy action by Congress, the shortfall of pilots could reach over 38,000 by 2030, including 15,000 mandatory retirements over the next five years alone.¹ According to the U.S. Government Accountability Office (GAO), 61 percent of qualified pilots must retire within the next two decades, and over this same period 4,300 ATP holders will reach the mandatory retirement age each year on average.² If these pilots are allowed to continue to fly, it will slow down the domino effect of attrition, equipment changes, and retraining that start with the retirement of a senior pilot, which ultimately culminates in the hiring of a pilot from a smaller air carrier. By moderating this attrition, smaller air carriers will be able to stabilize their workforce. This in turn will help create the environment where lost air service can return.

Despite increased FAA pilot certifications in 2022, there are not enough pilots qualified for hire. Though 9,491 new pilots qualified in 2022—the highest number on record—it fell far short of the 13,128 hired by just one subset of the airline industry last year.³ And pilot hiring this year hasn't slowed either and

¹ <https://wefly4you.com>, *Pilot Scarcity - 2022, What Did Not Happen, May 2023, Slides 10 and 15*.

² GAO-23-105571, *Aviation Workforce: Current and Future Availability of Airline Pilots and Aircraft Mechanics* Published: May 17, 2023.

³ <https://fapa.aero/hiringhistoryarchive.asp?year=2022>.

will continue to be robust because of the coming tsunami of pilot retirements. Currently more than 500 regional aircraft are parked, and aircraft remaining in service are being operated between 20-40% less than their usual operation.⁴ Today, 321 airports in the contiguous United States, or 75 percent, have lost on average 26 percent of their flights.⁵ Sixteen airports have lost all their service. From a state-by-state air service perspective, 43 of 50 states have less air service today than they did pre-pandemic. Additionally, comparing July 2019 departures to announced July 2023 schedules, network carriers have exited 73 markets, with almost all exits representing a loss of regional lift.⁶

The shortage of pilots is an immediate crisis that will continue to force major and regional airlines to significantly reduce capacity and growth for the remainder of the decade and beyond.⁷ Consumers will ultimately pay the price in the form of higher fares and reduced service options, including more frequent flight delays and cancellations. In addition, the loss of air service has many other adverse economic consequences, including stifling workforce development for businesses, increasing costs for manufacturers, reducing trade and tourism opportunities, and shrinking local revenues from taxes. Further, reduced air service threatens important funding streams for airports, such as AIP entitlement funding which are apportioned based on enplanements. The shortage also negatively impacts timely delivery of air cargo to rural areas and supply chain resiliency.

Lastly, nine countries currently have retirement ages above 65, and the International Civil Aviation Agency is in the process of reviewing best practices used by these countries as it considers an update to its own age standards.⁸ In the event the U.S. raises the retirement age, some pilots who wish to continue flying will have to transition to domestic routes where they will likely return to aircraft they have already flown. While this requires retraining, it is significantly less burdensome, complex, and time-consuming than what is required to train new pilots when a senior pilot retires.

Raising the retirement is a safe, practical solution for restoring air service and will also keep experience and expertise on the flight deck. We are counting on Congress to take the lead to address this vital issue, and we stand ready to assist you in your efforts. Thank you in advance for your consideration of our request.

Sincerely,



Raise the Pilot Age



Regional Airline Association

⁴ <https://www.flightglobal.com/fleets/nearly-500-regional-jets-parked-in-usa-cirium-fleets-data/152859.article>.

⁵ OAG published schedules July 2019 vs. July 2023.

⁶ OAG published schedules July 2019 vs. July 2023.

⁷ *Supra* note 1 at Slide 13.

⁸ 9 countries include Australia, Austria, Brazil, Canada, Costa Rica, New Zealand, Russia, Senegal, Ukraine



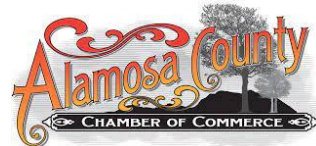
National Air Carrier Association



Regional Air Cargo Carriers Association



International Air Transport Association



Alamosa County Chamber of Commerce



Abraham Lincoln International Airport



Boise Metro Chamber



Casper Natrona County International Airport



Central Wyoming Regional Airport



Chippewa Valley Regional Airport



Dayton Area Chamber of Commerce



Dayton International Airport



Dubuque Regional Airport



Duluth Airport Authority



Duluth Area Chamber of Commerce



Eastern Iowa Airport



England Airpark



Golden Triangle Regional Airport



Greater Springfield Chamber of Commerce



Hilton Head Island Airport



Iowa Public Airports Association



Johnstown-Cambria Airport Authority



Keweenaw Economic Development Alliance



LaCrosse Regional Airport



Lake Charles Regional Airport



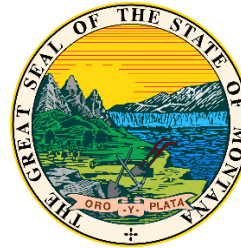
Mason City Municipal Airport



MHIRJ



Monroe Regional Airport



Montana Essential Air Service Task Force



New York Aviation Management Association



Northeast Wyoming Regional Airport



Oklahoma City Airports



Range Regional Airport



Rock Springs Chamber of Commerce



Salisbury Regional Airport



Santa Maria Valley Chamber



Sidney Richland Regional Airport Authority



Sioux Gateway Chamber



Siouxland Chamber of Commerce



Southwest Wyoming Regional Airport



Visit Boise



Washington County Chamber of Commerce



Williamsport Regional Airport



Williamsport/Lycoming Chamber of Commerce



The Longview Chamber



Alaska Air Carriers Association

CC:

Members of the Senate Committee on Commerce, Science, and Transportation