



March 13, 2020

The Honorable Rick Larsen
Chair, Subcommittee on Aviation
U.S. House of Representatives
Washington, DC 20515

The Honorable Garrett Graves
Ranking Member, Subcommittee on
Aviation
U.S. House of Representatives
Washington, DC 20515

Dear Chair Larsen and Ranking Member Graves,

On behalf of the Asthma and Allergy Foundation of America (AAFA), thank you for holding the hearing on the Airline Passenger Experience on March 3rd. AAFA is the leading patient organization advocating for people with asthma and allergies, and the oldest asthma and allergy patient group in the world.

We were pleased to see that the hearing included a focus on passengers with disabilities. I am writing to encourage you to ensure that the committee's continued work in this area takes into account the experiences of passengers with asthma or allergies, both disabilities requiring accommodation.

According to the Centers for Disease Control and Prevention (CDC), over 25 million Americans have asthma, and over 50 million have allergies. Like anyone else, this sizable portion of the population often travels by air for business, family visits, or pleasure. Travel by plane can be particularly risky for these passengers, particularly if they experience an asthma attack or allergic reaction mid-flight. AAFA has supported many common-sense policy goals to help protect the safety and lives of children and adults with allergies and asthma as air travelers:

- AAFA supports the recent Department of Transportation (DOT) Traveling by Air with Service Animals Notice of Proposed Rulemaking allowing airlines to limit the boarding of emotional support animals.¹ Animal dander is one of the most common allergens, and can also trigger asthma attacks in those living with asthma. We support the use of trained service animals for documented medical needs, but the proliferation of non-service animals in the cabin on flights has created increased risk for people living with allergies and asthma.
- AAFA also urged the DOT to ensure that the health needs of people with asthma and allergies are also accommodated. Specifically, people with medical documentation of severe allergies to animals, or of asthma triggered by animal dander, should be able to access seating a specific distance from any animal on a flight. This common-sense measure is not always provided. For example, we heard from a member of our community, who had a letter from her physician requiring a 30-foot distance from

¹ Traveling by Air with Service Animals Notice of Proposed Rulemaking:
<https://www.regulations.gov/document?D=DOT-OST-2018-0068-4724>



animals on the plane. In this case, a flight crew informed her that her needs would only be met if a seat was available. This is not an acceptable approach: someone with severe allergies on a plane is entitled to protection of her rights and health, and airlines should be required to provide this reasonable accommodation.²

- AAFA supports the availability of epinephrine auto-injectors in the main cabin of commercial flights. Currently, epinephrine is only required to be present in the locked cockpit, and is typically available on in a vial that must be drawn out with a syringe – a task that can be impossible for laypeople, and difficult even for medical professionals if turbulence is present. Auto-injectors such as “epi-pens” are easier to use, but not all people with allergies have their own on hand. Both children and adults can have new or undiagnosed allergies that first manifest on a flight. We have therefore urged the FAA to issue regulations requiring airplanes to include epinephrine auto-injectors in adult and pediatric dosages in all onboard emergency medical kits, so that they can be easily accessed and administered in an anaphylactic emergency.³

As these examples illustrate, for passengers with asthma or allergies, the passenger experience is still fraught with too many risks. We urge the Committee to affirmatively include people with these potentially fatal conditions in your work on the passenger experience, so that we can reduce the risk of preventable serious injury and death. AAFA would be happy to work with the Committee on these important issues.

Thank you very much for your time and attention.

Sincerely,

Kenneth Mendez
President and Chief Executive Officer
Asthma and Allergy Foundation of America

² *Id.*

³ AAFA Letter to Administrator Dickson, March 9, 2020. <https://www.aafa.org/media/2626/aafa-letter-faa-urging-airplane-regulations-require-epinephrine-autoinjectors-onboard.pdf>