



Docket Management Facility
U.S. Department of Transportation
1200 New Jersey Ave. SE,
West Building Ground Floor, Room W12-140
Washington, DC 20590-0001

Re: Traveling by Air with Service Animals, RIN No. 2105–AE63

To Whom It May Concern:

On behalf of the Asthma and Allergy Foundation of America (AAFA), I am pleased to comment on the notice of proposed rulemaking regarding Traveling by Air with Service Animals. AAFA is the leading patient organization advocating for people with asthma and allergies, and the oldest asthma and allergy patient group in the world. Overall, we support the proposal, which balances the needs of people who rely on service animals, including psychiatric service animals, with the health and safety of other passengers and crew. However, we also ask the Department of Transportation (DOT) to go further in requiring airlines to accommodate the needs and rights of asthma and allergy travelers.

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. Animal dander is one of the most common allergens, and can also trigger asthma attacks in those living with asthma.

To best capture the asthma and allergy community’s experience with air travel, we are currently fielding an online survey of adults who have, or care for a family member who has, asthma and/or environmental allergies (such as animal dander). The survey is open to any patient or caregiver with a self-reported diagnosis, regardless of whether they have ever experienced an asthma exacerbation or allergic reaction on a commercial airline. Although the survey remains open, interim results from 274 qualified respondents have been included in our comments on this proposed rule.

Among total respondents, 87% report diagnosis of asthma and 86% report diagnosis of environmental allergies (including 84% reporting diagnosis of both). Nearly three-quarters (75%) identify “furry or feathery animals” as a known trigger for the individual’s asthma and/or allergy. All respondents report having traveled on a commercial airline since diagnosis, with two-thirds (65%) having experienced at least one asthma exacerbation or allergic reaction on a plane since being diagnosed.

Accommodating Passengers with Allergies or Asthma

In implementing this proposal, we urge the Department to ensure accommodation of people with asthma and allergies. 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.



Quantitative data from our survey supports the notion that distancing measures may help reduce the number of reactions on planes. Over half (59%) of all respondents report having been on a flight with an animal in the cabin, with 22% of those individuals having experienced an asthma exacerbation or allergic reaction while the animal was on board. In 75% of cases, these animal-triggered reactions occurred when the individual was seated within 10 rows of the animal that caused the reaction. Providing simple and reasonable accommodations—such as flight crew compliance with risk-reduction measures like distancing—can help ensure that passengers with asthma and allergies feel safer while flying.

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

Stories like this are supported by qualitative data from our survey. In numerous cases, people with asthma and allergies report failed attempts in requesting health-specific accommodations from airlines and flight crews. One survey respondent was told by an airline that “it’s not within their right to ask people with animals to move even a few rows away.” Another respondent said “I asked to move seats when I saw that I would be sitting near a dog. The flight attendant humiliated me, yelled at me 'that passengers are not allowed to move seats' and when I kept telling her I was going to have an asthma attack, she threatened to kick me off the plane for being a problem. When we were taking off, she finally moved me.”

Fear of such backlash has resulted in increased reluctance to request support from airlines. One survey respondent tells us: “My 94-year-old mother and I were in the front row because she obviously needed help. The woman sitting next to me had a dog on her lap. I asked the flight attendant what I could do, and she became very rude and said that there were two seats in the last row we could move to. I have many stories of being treated horribly. That is why I don’t say anything to anyone, and I bring lots of medication and pray that the flight isn’t delayed so I wouldn’t have to sit there longer than planned.” Similarly, another respondent shared: “I have tried everything and tell airline that I will move if there is an animal nearby. They are not cooperative. It is amazing. I am not a difficult person but do have medical necessities that airlines do not help with.”

These anecdotes help rationalize why 26% of total survey respondents report avoiding air travel specifically because of asthma and allergies. For these individuals, their worlds have too-frequently “shrunk to driving distance.” We believe that taking steps to better accommodate health-related needs may help alleviate fears among passengers who have felt marginalized.

We, therefore, ask that DOT include in the final rule a requirement that airlines provide reasonable accommodations for passengers with documented allergies or asthma necessitating distance from any service animals, pets, or, for airlines that choose to permit them, emotional support animals in an airplane cabin.



Support for the Core Proposal

We support the flexibility that the proposal would give airlines to treat emotional support animals the same way as pets because we believe it will likely reduce the risk of animals triggering asthma attacks or severe allergic reactions.

We understand that if an airline chooses to treat emotional support animals as pets, there will still be animals on flights, namely service animals and pets for which people choose to pay the appropriate fee. However, it appears likely that the regulation would reduce the number of animals in a cabin, as well as the number that are openly on laps. Though the proposal will not *eliminate* the risk of allergic reactions or asthma attacks, we anticipate that it will mitigate risk, while respecting the rights of those with a documented need for a true service animal.

Quantitative survey data supports this hypothesis. Among instances of animal-related asthma/allergy reactions on planes, only 3% were triggered by a “service animal,” compared to 22% triggered by a “comfort animal” and 52% triggered by a personal pet. In remaining 23% of instances, the classification of the animal believed to have triggered the reaction was not known. This preliminary data suggests a positive correlation between in-flight asthma/allergy episodes and untrained, non-service animals.

We also support treating psychiatric service animals the same as other service animals, in the interest of promoting parity and diminishing burden and stigma for people who rely on them.

Conclusion

Accommodating the needs of people with animal allergies or asthma triggered by dander is only one component of keeping passengers healthy. AAFA supports requiring airlines to stock epinephrine autoinjectors on all flights, and we also support meaningful accommodation of passengers’ food allergies. But the proposed rule does reflect one important opportunity to take steps to promote health and safety for our patient community when they fly, and we support it with the addition of explicit accommodations for people with animal allergies.

Thank you very much for your time and attention. AAFA would be happy to work with DOT and other stakeholders to develop a framework that appropriately balances the rights and health of people with service animals, travelers with pets, and those living with asthma and allergy. If you have any questions, please contact

Sincerely,

Kenneth Mendez
President and CEO
Asthma and Allergy Foundation of America