January 29, 2021

Mr. Jeffrey Zients
COVID-19 Recovery Team Coordinator
The White House
1600 Pennsylvania Ave., NW
Washington, D.C. 20500

Dear Mr. Zients:

Thank you for your work on the Executive Order *Promoting COVID-19 Safety in Domestic and International Travel*. As representatives of America's aviation, travel and tourism industries, we share President Biden's commitment to saving lives and allowing all Americans to travel and work safely. We believe the only way to achieve these goals is through data-driven, risk-based and feasible public health measures that reduce COVID-19 transmissions and allow travel and economic growth to safely resume. Our continuing partnership with relevant Federal agencies has played a critical role in developing and implementing policies that enhance the safety of flying. The aviation industry is committed to partnering with the COVID-19 response team, and we urge you to work together with us to continue these efforts and to continue providing industry an opportunity to participate meaningfully in discussions about transportation and travel restrictions.

To that end, we strongly support many aspects of the Executive Order, such as the Federal mask mandate for interstate travel and pre-departure testing for international arriving passengers. However, we are concerned by recent media reports that the Centers for Disease Control and Prevention (CDC) is considering a pre-departure testing requirement for domestic air travel. The industry remains committed to supporting risk-based, scientific approaches to contagion mitigation.

Since the beginning of this pandemic, the health and safety of workers and traveling public have been the aviation and travel industries' top priority. In April, representatives across the entire travel ecosystem partnered with public health officials to develop uniform health and safety guidance to reduce the risk of COVID-19 transmission throughout the travel process.[1] This science-driven, layered approach aligns with CDC's own guidance and includes recommendations on universal mask wearing, physical distancing, enhanced sanitization and

[1] https://www.ustravel.org/toolkit/industry-guidance-promoting-health-and-safety-all-travelers

more. U.S. airlines have implemented multiple layers of protection to prevent virus transmission onboard the aircraft, including strict face covering requirements, pre-flight health forms, enhanced disinfection protocols, hospital-grade filtration systems and air exchanges that remove viruses. Likewise, airports have augmented efforts to clean and sanitize their facilities, upgraded their air filtration systems, promoted physical distancing, provided facial coverings for those in need and expanded touchless technology options to reduce the likelihood of the virus being transmitted to travelers or workers in these facilities.

According to a growing body of rigorous scientific research, these health and safety protections have significantly reduced the risk of COVID-19 transmission onboard an aircraft. In November, a Harvard Aviation Public Health Initiative study found that air travel is as safe as — or substantially safer than — other routine activities, such as eating out and grocery shopping.[2] Similarly, US TRANSCOM[3] conducted 300 tests over six months with mannequins to reproduce breathing and coughing to determine how particles moved within the cabin when a mask was on or off. The study concluded that when masks are worn, there is a 0.003 percent chance that particles exhaled by a passenger can enter the breathing space of passengers sitting next to them. Therefore, it's not surprising that data published by the International Air Transport Association (IATA) shows that, of the 1.2 billion airline passengers who traveled since the beginning of 2020, only 44 cases of in-flight COVID-19 transmission have been reported. And the vast majority of cases occurred before face covering were universally required.[4]

Given the strong scientific evidence that the risk of COVID-19 transmission onboard an aircraft is very low, we believe that a testing requirement for domestic air travel is unwarranted. Further, public health and economic data indicate that this policy would disproportionately prevent low-income travelers and rural Americans in small communities from travel. They may have less access to testing facilities, which could cause further job loss and economic harm to the most devastated sectors of the economy, who will need air service to take part in recovery. Therefore, the costs and consequences of a testing requirement for domestic air travel would far outweigh any potential benefits.

In fact, a pre-departure testing mandate for domestic air travel would divert testing and financial resources away from more pressing public health priorities. For example, based on January 2021 data, a testing requirement for domestic air travel would necessitate a 42 percent increase in daily testing capacity nationwide.[5] Although testing production is expected to increase, there is no question that a mandate of this magnitude would syphon public health resources away from more vulnerable populations such as nursing homes, medical facilities and schools. Singling out air travel also would not effectively capture movement from state to state since travelers are likely to simply drive, take a bus or a train, all conveyances which do not have the measures in place that make air travel uniquely safe. Both the WHO and European CDC have noted that when community spread is as prevalent as it is now these types of restrictions and mandates simply aren't that effective. As a country we need to focus on the behaviors and activities that are driving transmissions and double down on mask wearing, social distancing and hand washing.

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[2] See https://npli.sph.Harvard.edu/resources-2.
[3] See https://www.ustranscom.mil/cmd/panewsreader.cfm?ID=C0EC1D60-CB57-C6ED-90DEDA305CE7459D&yr=2020
[4] See https://www.iata.org/contentassets/a1a361594bb440b1b7ebb632355373d1/iata-cabin-safe.pdf

[5] Data compares TSA throughout for January 2021 and daily reported COVID-19 tests for January 2021: https://www.tsa.gov/coronavirus/passenger-throughput and https://covidtracking.com/data/charts/us-daily-tests

We look forward to continuing our partnership with COVID-19 response team and relevant Federal agencies to develop and implement risk-based, data-drive public health measures that enhance the safety of flying. We urge you to seek input from aviation and travel stakeholders before implementing any additional measures to ensure that implementation will be feasible and effective for defeating the health and economic consequences of the virus.

Again, thank you for your focus on protecting the United States from the health and economic damage inflicted by COVID-19. We look forward to continuing our work together to safely and responsibly restore domestic and international air travel.

*Air Line Pilots Association, International*
*Aerospace Industries Association*
*Airlines for America*
*Airline Passenger Experience Association*
*Airport Council International – North America*
*American Association of Airport Executives*
*American Hotel and Lodging Association*
*American Society of Travel Advisors*
*Asian American Hotel Owners Association*
*Association of Flight Attendants – CWA*
*Cargo Airlines Association*
*Global Business Travel Association*
*International Air Transport Association*
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