



National Air Carrier Association

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Honorable John Thune
Chairman
Committee on Commerce, Science,
and Transportation
United States Senate
Washington, D.C. 20510-6125

Honorable Bill Shuster
Chairman
Committee on Transportation and
Infrastructure
U.S. House of Representatives
Washington D.C. 20515-6256

Honorable Bill Nelson
Ranking Member
Committee on Commerce, Science,
And Transportation
United States Senate
425 Hart Senate Office Building
Washington, D.C. 20510

Honorable Peter A. DeFazio
Ranking Member
Committee on Transportation and
Infrastructure
U.S. House of Representatives
2164 Rayburn House Office
Building
Washington D.C. 20515

Dear Chairmen Thune and Shuster, Ranking Members Nelson and DeFazio:

National Air Carrier Association (NACA)¹ represents the interests of sixteen scheduled and non-scheduled United States passenger and cargo airlines. Our member airlines operate domestically and in every part of the world on behalf of the U.S. military and commercial customers. Three NACA members - Allegiant Air, Spirit Airways, and Sun Country Airlines – fly daily scheduled flights throughout the U. S. and to international points.

It has come to our attention that a proposal regarding minimum dimensions for passenger seat width and pitch (distance between seat rows) is being considered by some members of

¹ NACA Members: Air Transport International, Allegiant Air, Atlas Air, Eastern Air Lines, Everts Air Cargo, Kalitta Air, Lynden Air Cargo, Miami Air International, National Airlines, Northern Air Cargo, Omni Air International, Southern Air, Spirit Airlines, Sun Country Airlines, USA Jet Airlines, Western Global Airlines.

Congress. Our passenger airlines would have significant concerns about such a proposal and would strongly oppose its adoption in the Federal Aviation Administration (FAA) Reauthorization Act.

The federal government has an important role to play in helping to keep airlines operating safely and securely. FAA regulations currently require manufacturers and airlines to install seating configurations in aircraft that permit evacuation of passengers in a prescribed number of minutes in the event of an emergency. Federal Air Regulations part 25 Sec. 25.803 (governing aircraft manufacturers) and part 121 Sec 121.291 (governing airlines) specify that an emergency evacuation be accomplished within ninety (90) seconds at full seating capacity, including crew members, and with no more than fifty percent (50%) of emergency exits and slides deployed.

There are practical minimum requirements, therefore, governing size of seats, seat pitch, and width of aisles since evacuation times must be met. All U.S. airlines operate aircraft that comply with these regulations.

Individual airlines make marketing-based decisions regarding size of seats, seat pitch, and width of aisles greater than what is required to meet FAA's regulations. Airlines, further, make different seating options available to their passengers, depending on size of aircraft, points being served, length of flights, and fare classes. The public is free to make travel decisions by choosing which airline best meets their needs based on customer service, schedules, fares, seat comfort, and cabin service. The general rule is that an airline is able to offer lower fares (only one of the options) when it installs more seats on its aircraft (subject to evacuation regulations). That airline is able to divide the cost of flying a segment into smaller pieces – thus, lower fares.

Size of seats in the main cabins of U.S. carriers flying domestically has not changed in many years. Aircraft manufacturers supplying U.S. airlines compete, in fact, to offer the *widest* seat possible not the *narrowest*, given the cross section of the aircrafts' cabins. One must recognize that Boeing and Airbus sell to U.S. legacy and ultra-low-cost (ULCC) carriers, and Bombardier and Embraer supply the regional carriers. Boeing and Airbus produce aircraft with wider cross-sections than Bombardier and Embraer, so seats in Boeing and Airbus aircraft will be wider.

Regionals fly 45% of domestic passengers and provide the only scheduled service to 65% of U.S. airports, so, it has been a gradual shift over the years from service by legacy to regional carriers, resulting in smaller seats. (Regional aircraft are, generally, between 44 and 100 seats, and legacy and ULCC aircraft are above 100 seats.) But, communities all over America now have jet service where they used to have turboprop and have responded with increased numbers of passengers flying – albeit in smaller seats.

Boeing and Airbus customers have maintained the same number of seats per row in main cabins, and the two manufacturers compete based on seat width: which has the *widest* seat. Both Boeing and Airbus continually work on redesigns of cabins to reduce the width of window reveals side bulkheads to *increase* seat and aisle size.

Manufacturers and airlines cannot be held responsible for the increased size and weight of the average American male (30 pounds over the last 50 years) and female (26 pounds). This maybe the real cause behind the call by some for larger seats. Initiation of steps to reverse the trend toward heavier passengers is, clearly, outside the aviation industry's remit – which steps would bring immediate relief for the traveling public.

The matter of seat pitch is also in discussion. Seat pitch in main cabins of U.S. airlines has been reduced over the years. (One must remember to distinguish between legacy and ULCC carriers, on the one hand, and regional carriers, on the other, since regionals fly smaller aircraft.) But, seat manufacturers have invested in new designs with modern ergonomics and lighter and stronger materials. These advances have resulted in less absolute space between seats without a concomitant perception of reduced space. And, an airline's ability, through technology, to increase the number of rows in a given aircraft leads to lower fares. Passengers have the ability to choose which carrier to fly based on the tradeoff between lower fares and less seat pitch. This is a *plus* for passengers not a negative.

Passengers would lose their ability to choose lower fare options if the federal government were to mandate minimum seat pitch and seat size, because numbers of seats in a cabin would have to be reduced. The impact of this mandate would disproportionately affect middle to low income individuals and families. Such a mandate from the federal government would likely require some airlines take out multiple rows of seats, which would force them to raise their prices as less seats would be available on the aircraft. This move could compel some airlines to raise their fares by \$10, \$20, or higher per segment, depending on the aircraft-type and route. This could make all the difference for a college student, senior citizen, or family with a modest income making a decision whether to travel by air.

We request that you continue to let customers make their ultimate decisions as to which airline, along with their seats, best meets their traveling needs. Do not try to regulate customer choice.

Sincerely,

A handwritten signature in black ink that reads "A. Oakley Brooks". The signature is written in a cursive, slightly slanted style.

A. Oakley Brooks
President