



**Association of Professional  
Flight Attendants**

*Representing the Flight Attendants of American Airlines*

December 2, 2020

Lucretia Guia  
VP Labor Relations & Deputy General Counsel  
American Airlines, Inc  
1 Skyview Drive MD 8B500  
Fort Worth, Texas 76155

RE: SS-81-2020-APFA-2 **APFA vs American Airlines**  
*Reduction in Staffing Levels on Airbus A321T, 777-200, 77-300 and 787-9 Aircraft*

Dear Ms. Guia:

In accordance with the Joint Collective Bargaining Agreement in effect between American Airlines, Inc. (“AA” or “the Company”) and the Association of Professional Flight Attendants (“APFA” or “the Union”) (collectively, “the Parties”), APFA hereby submits the above-referenced grievance to the System Board of Adjustment (“the Board”).

**1. Questions at Issue**

Did the Company violate Sections 10.Q.1, 2 and 3 of the JCBA and any related sections by implementing new staffing formulas for the Airbus A321T and Boeing 777-200, 777-300 and 787-9 aircraft, which assign an unreasonable workload to flight attendants assigned to work on board these flights?

Did the Company violate Section 4 of the October 19, 2005 Settlement of the Presidential Grievance 2004-APFA-002 (737 Staffing) and Agreement on Flight Attendant Layover Rest and Crew Meals (“737 Staffing Presidential Grievance Settlement”) by failing to use any joint modeling program to evaluate the new staffing formulas prior to the notice of intent to change staffing levels on the Airbus A321T and Boeing 777-200, 777-300 and 787-9 aircraft?

**2. Statement of Facts**

APFA filed the grievance on October 23, 2020 (Submission Exhibit 1). On November 12, 2020, the Company denied the grievance (Submission Exhibit 2). The Union finds the Company’s decision to be unsatisfactory and therefore respectfully submits the grievance to the Board for adjudication.

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### **3. Position of the Union**

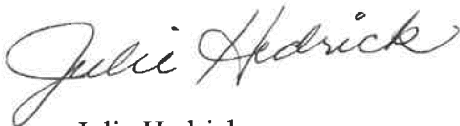
The APFA's position is that the Company violated Sections 10.Q.1, 2 and 3 and any related sections of the JCBA and Section 4 of the 737 Staffing Presidential Grievance Settlement. The Union therefore respectfully urges the Board to render a decision that (1) finds the Company's actions to be improper; (2) orders the Company to cease and desist from all violations of the JCBA and the 737 Staffing Presidential Grievance Settlement; (3) orders the Company to immediately rescind the implementation of the Airbus A321T and Boeing 777-200, 777-300 and 787-9 staffing formulas; (4) orders the Company, in consultation with the Union, to immediately adjust the Airbus A321T and Boeing 777-200, 777-300 and 787-9 aircraft staffing formulas to eliminate the unreasonable workload; (5) orders the Parties to jointly evaluate and assess flight attendant workload on the Airbus A321T and Boeing 777-200, 777-300 and 787-9 aircraft through the procedure agreed-upon in the 737 Staffing Presidential Grievance Settlement; (6) orders the Company to make whole all flight attendants adversely affected by the Company's actions, including, but not limited to, restoring all compensation and/or benefits lost; and (7) awards any other relief that the Board deems just and proper.

### **4. Position of the Company**

The Company's position is contained in its November 12, 2020 denial of the grievance (Submission Exhibit 2). Should the Company desire to amend or supplement its position, it is required to do so no later than thirty (30) days from the Commissioner's receipt of this Submission.

With reference to setting a date for the hearing of the case before the Board, your attention is directed to Sections 31.K.3 and M of the JCBA.

Sincerely,



Julie Hedrick  
National President

cc: SBA

Cindi Simone  
Managing Director  
Labor Relations



November 12, 2020

RECEIVED  
APFA

NOV 12 2020

Julie Hedrick  
President Association of Professional Flight Attendants  
1004 West Euless Blvd.  
Euless, TX 76040

System Board of Adjustment  
By 

Re: Grievance Response – 2020-APFA-2 *Reduction of Staffing Levels on Airbus A321T, 777-200, 777-300, and 787-9 Aircraft*

Dear Ms. Hedrick,

This letter serves as the Company's response to the Association of Professional Flight Attendants' ("APFA") Presidential Grievance, received October 23, 2020, regarding aircraft staffing reductions and service level changes and Joint Collective Bargaining Agreement ("JCBA") sections 10.Q.1-4 (the "Grievance"). The Grievance alleges that the Company violated the JCBA when it altered the staffing formula and, thereby, imposed an unreasonable workload on flight attendants on board the A321T, Boeing 777-200, 777-300, and 787-9 aircraft (collectively, the "Aircraft"). After careful consideration, the Company denies the Grievance because, as described more thoroughly below, the Company exercised its discretion to alter the staffing formulas and, in doing so, did not impose an unreasonable workload on flight attendants or otherwise violate the JCBA.

The JCBA provides "the Company may establish, at its discretion and from time to time, new staffing formulas" and "service levels." JCBA § 10.Q.3. The JCBA does not circumscribe the Company's discretion to alter staffing formulas or service levels except to require that the staffing formulas "shall be made available to Flight Attendants, and APFA shall be notified of a change forty-five (45) days prior to implementation of the new formula." *Id.* § 10.Q.3. Here, the Company appropriately exercised its discretion to alter the staffing on the Aircraft and timely complied with its obligation to notify the APFA of the anticipated changes. *See id.* § 10.Q.2-3. The Company also invited the APFA to participate in surveys and other analysis regarding the workload, but the APFA declined.

As a safeguard, the JCBA provides the APFA the right to "file a Presidential Grievance if the Company abuses its discretion by assigning an unreasonable workload to Flight Attendants." *Id.* § 10.Q.3. The APFA now invokes that right but cites no evidence to support its assertion that the changes in staffing and/or service levels have increased the workload on flight attendants at all, let alone imposed an "unreasonable" workload. Indeed, the APFA cannot establish an "unreasonable" workload, whether in today's environment—when the demands on flight attendants are considerably less than the time immediately preceding the current pandemic—or under more ordinary circumstances.<sup>1</sup>

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<sup>1</sup> Although not challenged by the instant grievance, such changes are and will continue to be reasonable if/when the Company emerges from the current COVID-19 pandemic and associated decrease in demand and/or reduced services.

Finally, the Grievance also asserts that the Company failed to comply with the 737 Staffing Presidential Grievance Settlement (the “737 Settlement”) when it failed to utilize certain modeling programs and data collections methods to analyze the workload. Importantly, the parties never incorporated the cited portions of the 737 Settlement into subsequent collective bargaining agreements or the currently applicable JCBA. Therefore, the workload analysis provisions of the 737 Settlement are not binding on the Company. Even if the workload analysis provisions of the 737 Settlement were binding, however, the Company did not violate the Settlement because the parties merely agreed to “explore” the use of particular tools and methods to analyze workloads, and neither party committed to using any particular tools/methods. Accordingly, absent a commitment and subsequent failure to do as agreed, the Company cannot be said to have violated the workload analysis provisions of the 737 Settlement.

In sum, the Company respectfully denies the Grievance. I remain available to discuss at your convenience.

Sincerely,

A handwritten signature in cursive script, appearing to read "Cindi Simone".

Cindi Simone  
Managing Director, Labor Relations



**Association of Professional  
Flight Attendants**

*Representing the Flight Attendants of American Airlines*

October 23, 2020

**BASE CASE # 2020-APFA-2**

Ms. Lucretia Guia  
*VP Labor Relations & Deputy General Counsel*  
American Airlines, Inc.  
1 Skyview Drive, MD 8B500  
Fort Worth, TX 76155

RE: *Reduction of Staffing Levels on Airbus A321T, 777-200, 777-300 and 787-9 Aircraft*

Dear Ms. Guia:

In accordance with the provisions of Sections 10.Q.1-4 and 30.B.2 of the Joint Collective Bargaining Agreement (“JCBA”) between American Airlines, Inc. (“AA” or “the Company”) and the Association of Professional Flight Attendants (“APFA” or “the Union”), APFA hereby protests the Company’s violation of Sections 10.Q.1-3 of the JCBA and any related sections as they pertain to the Company’s October 1, 2020 unilateral implementation of new staffing formulas for the Airbus A321T and Boeing 777-200, 777-300 and 787-9 aircraft. Through the new staffing formulas, the Company unfairly has assigned an unreasonable workload to Flight Attendants on board these aircraft in violation of the JCBA.

The Company’s unilateral implementation of the new staffing formulas also clearly violates Section 4 of the 737 Staffing Presidential Grievance Settlement, in which the parties agreed “to jointly explore evaluation of Flight Attendant task and workload analysis on all aircraft using the modeling program and data collection methods developed for use by APFA in the 737 Presidential Grievance.”

APFA demands that the Company immediately cease and desist from implementing the new staffing formulas until the parties can jointly evaluate and assess Flight Attendant workload on the Airbus A321T and Boeing 777-200, 777-300 and 787-9 aircraft through the procedure agreed to in the 737 Staffing Presidential Grievance Settlement.

In the alternative, APFA demands that the Company, in consultation with APFA, adjust the staffing formulas on the Airbus A321T and Boeing 777-200, 777-300 and 787-9 aircraft to eliminate the unreasonable workload.

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*Reduction of Staffing Levels on Airbus A321T, 777-200, 777-300 and 787-9 Aircraft*

APFA further demands that the Company make whole all affected Flight Attendants and grant any and all additional relief deemed appropriate.

Sincerely,



Julie Hedrick  
National President

cc: SBA