

September 1, 2020

The Honorable Elaine Chao  
Secretary of Transportation  
U.S. Department of Transportation  
1200 New Jersey Avenue, SE  
Washington, DC 20590

**RE: Support for FlyersRights.org’s petition for an Emergency Final Rule requiring all air carriers and airport operators to require all persons to wear protective face masks or coverings at all times at airports and on airplanes (docket number DOT-OST-2020-0135)**

Dear Secretary Chao:

The undersigned consumer advocacy, workers’ rights, science, research, public health, disability rights, LGBTQ+ social justice, and business organizations respectfully urge you to immediately grant the FlyersRights.org’s August 4, 2020, petition for an Emergency Final Rule that would require all air carriers and airport operators to require all persons to wear protective face masks or coverings at all time at airports and on airplanes.

The emergency rule requested by FlyersRights.org is a simple, commonsense measure for mitigating the spread of the severe acute respiratory syndrome coronavirus 2 (SARS-CoV-2), the novel virus that causes coronavirus disease 2019 (COVID-19), among airplane passengers and crew members, airport workers, and other airport visitors.

The COVID-19 pandemic represents an ongoing public health crisis in the U.S. To date, more than 6 million Americans have been infected with SARS-CoV-2, and more than 183,000 have died from COVID-19. Dr. Robert Redfield, Director of the Centers for Disease Control and Prevention (CDC), has stated that “Cloth face coverings are one of the most powerful weapons we have to slow and stop the spread of the virus – particularly when used universally within a community setting. All Americans have a responsibility to protect themselves, their families, and their communities.”<sup>1</sup>

The CDC specifically recommends that everyone wear a mask over their nose and mouth when in public, including during travel. The CDC further highlights that air travel requires spending time in security lines and airport terminals, which can bring airplane travelers and others into close contact with other people. Finally, the CDC points out that although most viruses do not spread easily on flights because of how air circulates and is filtered on airplanes, social distancing is difficult on crowded flights, and sitting within six feet of others, sometimes for hours, may increase the risk of being infected with SARS-CoV-2.<sup>2</sup>

Consistent with the CDC’s recommendations, the U.S. Departments of Transportation, Homeland Security, and Health and Human Services also recommend that everyone — with

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<sup>1</sup> Centers for Disease Control and Prevention. CDC calls on all Americans to wear masks to prevent COVID-19 spread. July 14, 2020. <https://www.cdc.gov/media/releases/2020/p0714-americans-to-wear-masks.html>. Accessed August 31, 2020.

<sup>2</sup> Centers for Disease Control and Prevention. Travel during the COVID-19 Pandemic. August 21, 2020. <https://www.cdc.gov/coronavirus/2019-ncov/travelers/travel-during-covid19.html>. Accessed August 31, 2020.

limited exclusions — correctly wear a mask or cloth face covering over their nose and mouth *at all times* in the passenger air transportation system, which includes both at airports and on airplanes.<sup>3</sup> The limited exclusions include children under age two and anyone who has a medical condition that causes trouble breathing, is unconscious and unable to be awakened, or is otherwise unable to remove the mask without assistance; reasonable accommodations also should be made for persons with disabilities or ailments who cannot wear masks or cloth face coverings.

But only recommending mask-wearing at all times in the passenger air transportation system is not sufficient. This critical preventative public health measure must be mandated by enforceable federal regulations that apply to all airlines and airports subject to the jurisdiction of the U.S. Department of Transportation. Such regulatory action would better protect all airplane passengers and crew members, airport workers, and other airport visitors from the threat of COVID-19.

Thank you for your prompt attention to this urgent public health matter.

Sincerely,

Annie Appleseed Project  
Business Leaders for Health Care Transformation  
Center for Science in the Public Interest  
Center for Social Epidemiology  
Citizens' Environmental Coalition  
Coalition of Labor Union Women  
Consumer Action  
Consumer Federation of America  
Empire State Consumer Project  
Equality North Carolina  
KidsAndCars.org  
MomsRising  
National Black Gay Men's Advocacy Coalition  
National Disability Rights Network (NDRN)  
National Women's Health Network  
Philaposh  
Protect All Children's Environment  
Public Citizen  
SafeWork Washington  
Sciencecorps  
U.S. PIRG Education Fund  
Woodymatters  
Worksafe

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<sup>3</sup> U.S. Departments of Transportation, Homeland Security, and Health and Human Services. Runway to Recovery: The United States Framework for Airlines and Airports to Mitigate the Public Health Risks of Coronavirus. July 2020. [https://www.transportation.gov/sites/dot.gov/files/2020-07/Runway\\_to\\_Recovery\\_07022020.pdf](https://www.transportation.gov/sites/dot.gov/files/2020-07/Runway_to_Recovery_07022020.pdf). Accessed August 31, 2020.