

INTERNATIONAL BROTHERHOOD OF TEAMSTERS



Pete Buttigieg

U.S. Secretary of Transportation

1200 New Jersey Avenue SE

Washington, District of Columbia 20590

Dear Mr. Buttigieg,

On behalf of the Pilots of Allegiant Air and the Executive Board of The Allegiant Pilots Association Teamsters Local 2118, we would like to express our concerns regarding Docket DOT OST-2021-0152. Representing more than 1150 Allegiant Air Pilots and being a major stakeholder in this submission, we implore you to consider our position. In unity, we vigorously oppose the joint venture between Viva Aerobús and Allegiant Air and oppose granting Allegiant's request for Anti-Trust immunity by the DOT pursuant to this joint venture and its pursuit of offshoring American Jobs.

We are currently in the middle of negotiations with the management of Allegiant Air, who are steadfastly unwilling to agree to anything close to industry standard work rules, benefits, and compensation commensurate to our peers. For years, we have operated under a sub-par Collective Bargaining Agreement and, predictably, Allegiant management has sought for cheaper alternatives to employing American pilots rather than negotiating fair and equitable terms. Allegiant already benefits from significantly lower labor costs than any other comparable industry peer and has every intention of keeping it that way. This proposed joint venture is a further attempt by Allegiant management to circumvent rising labor standards and market pressures for increased wages for airline pilots in America. Simply put, Allegiant isn't willing to pay the market rate for American pilots. Approving this Anti-Trust Immunity request will significantly undermine the capacity for our Union to protect American jobs and improve the working conditions of our membership.

Furthermore, we believe that this joint venture would disrupt the industry and provide an unfair competitive advantage to Allegiant in possible violation of Anti-Trust laws. There is nothing in Allegiant's request for anti-trust immunity that indicates that Allegiant pilots will receive equitable work in comparison to the proposed foreign pilots. We are convinced that the intention is to replace American airline pilot jobs with those of Mexican pilots whose salaries are approximately five to six times lower than our members' negotiated salaries, which are already far below the industry standard. No doubt, this would give Allegiant an unfair competitive advantage over all other US Carriers.

We believe that the American people overwhelmingly oppose any joint ventures that result in "off-shoring" American jobs. Therefore, we believe the Department of Transportation would be acting against the will of most Americans by granting Anti-Trust immunity to and approval for the Allegiant Air-Viva Aerobús joint venture.

Allegiant Pilots Association | Teamsters Local Union No. 2118

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www.apa2118.org

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INTERNATIONAL BROTHERHOOD OF TEAMSTERS



Respectfully,

The Allegiant Pilots Association

Teamsters Local 2118 Executive Board

A stylized, handwritten signature in black ink, consisting of a large, sweeping 'A' followed by a series of connected loops and a final horizontal stroke.

Captain Andrew Robles

President

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Ryan Fogelsanger

Vice President

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Erick Valenzuela

Secretary-Treasurer

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Kurt Hanson

Trustee

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Michael Cawley

Trustee

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Ryan Joseph

Trustee

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Joshua Rockwood

Recording Secretary

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