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## **IAM Responds to AMFA’s Challenges in NMB Representation Case**

Dear Sisters and Brothers:

The IAM has filed a formal reply with the National Mediation Board (NMB) addressing AMFA’s objections in the ongoing representation case involving Alaska Airlines and Hawaiian Airlines (Case No. R-7669). AMFA is attempting to exclude Hawaiian Airlines Cleaners and Line Servicemen from the voter eligibility list in the Mechanics & Related (M&R) craft or class.

The IAM’s filing strongly opposes that move, stating that AMFA’s objections are self-serving, unsupported by evidence, and inconsistent with decades of NMB precedent.

The IAM makes clear that our position is not based merely on shared contract coverage, but on functional integration, shared work conditions, and community of interest between Hawaiian Cleaners, Line Servicemen, and Aircraft Mechanics. These employees work side-by-side with mechanics on the flight line and in the hangar, follow the same maintenance-driven safety and quality assurance procedures, and perform coordinated, interdependent tasks essential to aircraft servicing and maintenance.

The filing details sworn declarations from veteran Hawaiian employees—Lead Cleaners, Lead Line Servicemen, and Lead Aircraft Mechanics—confirming that aircraft movements, cleaning, and maintenance are sequenced, carded, and verified together under the same Standard Operating Procedures. This evidence demonstrates a clear maintenance-related community of interest.

The IAM’s reply highlights several contradictions in AMFA’s filing:

- AMFA seeks to exclude Hawaiian Cleaners and Line Servicemen, yet it represents similar classifications—Fleet Service and Janitors—at pre-merger Alaska, performing nearly identical duties.

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- AMFA argues that cleaning and fueling belong to Ramp Agents, while also claiming Cleaners share more in common with Ramp than Mechanics—positions that the IAM calls internally inconsistent and unsupported by the record.
- AMFA relies on speculative outsourcing scenarios and contract labels rather than current operational facts, contrary to NMB rules, which require decisions to be based on existing work functions.

The IAM's filing cites nearly 80 years of NMB rulings confirming that cleaning, fueling, and related aircraft servicing work are integral to the Mechanics & Related craft or class. Cases cited include: National Airlines (1947), Eastern Airlines (1965), United Airlines (1977), American Airlines/US Airways (2015), and American Airlines (2021).

Under this well-established framework, Cleaners and Line Servicemen properly belong in the M&R classification.

The IAM argues that excluding these Hawaiian employees would disenfranchise them from voting in the very craft or class whose procedures and safety standards govern their daily work. The filing urges the Board to maintain their eligibility and reject AMFA's selective and outcome-driven challenges.

The IAM's reply asks the NMB to deny AMFA's request for exclusion, uphold the inclusion of these classifications on the eligibility list, and ensure that every eligible employee has a voice in choosing their representation.

Sincerely and fraternally,

John M. Coveny, Jr.  
President/Directing General Chair

JMC/td

cc: R. Johnsen, General Vice-President, Air Transport Territory  
E. Fraser, Chief of Staff, Air Transport Territory  
J. Carlson, Airline Coordinator, Air Transport Territory  
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