

April 5, 2017

The Honorable Elaine Chao
Secretary
U.S. Department of Transportation
1200 New Jersey Ave, S.E.
Washington, D.C. 20590

Dear Secretary Chao:

I am writing to you on behalf of the United States Contract Weather Observing Association (USCWOA), which represents over 400 weather observers across the nation. Our trained and professionally certified weather observer members are employed through the Contract Weather Observing (CWO) Program within the Department of Transportation's (DOT) Federal Aviation Administration (FAA). Our mission is to provide, both, critical weather monitoring in real-time as weather conditions can rapidly change and augmentation and back up of the Automated Surface Observing System (ASOS) due to its' limitations at many high traffic/adverse weather airports across the United States. We strongly encourage continued support for the CWO Program and for all contract weather observers across the nation under your leadership.

Currently, professional weather observers provide critical services at 135 airports around the country. These airports include major hubs, including all three major airports in the D.C.-Baltimore area (Reagan National, BWI, and Dulles), medium-sized "spoke" airports, as well as smaller "feeder" airports that frequently experience adverse weather conditions.

In 2013, the FAA initiated a process to examine potentially eliminating these critical services at all 135 sites across the country in what was written by their Contract Tower and Weather Team as the "CWO Transition Plan". The FAA envisioned that it would shift the necessary responsibility for monitoring the skies at airports across the country from meteorological professionals to air traffic controllers in what is known as Limited Aviation and Weather Reporting Station (LAWRS). Not only does the name provide insight into the loss of needed weather data that would occur, but weather observing responsibility would solely shift in to the hands of those who have little experience and expertise to take on this as a tertiary duty, particularly and rightfully considering that their duties to move ground and air traffic must come first.

When that plan lost its' momentum, the FAA decided in 2015 to try the divide and conquer approach and "only" transfer over weather observing responsibilities at 57 of the 135 total CWO airports, which they claimed had low enough air traffic and acceptable enough weather to eliminate the contract weather observers at these locations. In either plan, the FAA did not demonstrate how they would mitigate the safety hazards and risks that would be created due to their proposals on our National Airspace System (NAS).

As a result of these concerns, Congress included a provision in the *H.R.636 - FAA Extension, Safety, and Security Act of 2016* (Public Law: 114-190) that prohibited the FAA Administrator from discontinuing the contract weather observer program at any airport until October 1, 2017. Additionally, in advance of this

provision being included in the FAA extension, many members of Congress directly raised the issue with the DOT, highlighting the negative implications of moving forward with elimination of these critical and dedicated contract weather observer services.

Today, members of USCWOA continue to provide operationally-significant weather information that supports the entire aviation community. Any loss of this dedicated safety service would create significant aviation safety hazards and result in a severe degradation of service for airports, airline operators, the National Weather Service, and the general flying public. Additionally, in the absence of dedicated weather observers, the FAA may require airports to train additional staff, or use dedicated air traffic controllers, who would then be responsible for the accuracy of real-time weather information.

Since the introduction of this idea in 2013, both, the professional weather observers and aviation groups have expressed concern that air traffic controllers may not be up to the task of keeping pilots apprised of rapidly changing weather conditions. Specifically, the Aircraft Owners and Pilots Association (AOPA), which represents 400,000 aviation pilots, has raised these specific concerns as the number one cause of general aviation fatalities is weather-related issues. Other groups, like Southwest and Delta Airlines, the United Parcel Service, and the American Association of Airport Executives (AAAE) have also expressed major concerns with the proposed elimination of the CWO Program.

In closing, the USCWOA represents more than 400 hardworking men and women across the nation. The consequences of eliminating this service would be detrimental to the aviation industry and the traveling public. We look forward to working with you to ensure that these essential services in support of aviation safety this year remain and throughout this administration.

Thank you for your consideration on this critical matter and our officers would be more than happy to sit down with you to further explain why the loss of our services would be so detrimental to the NAS.

Sincerely,



Charles Starrett
USCWOA President/Chairman



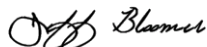
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