August 9, 2019

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

Dear Secretary Chao:

We are writing to commend the Department of Transportation (DOT) for issuing final guidance regarding support animals. DOT’s statement is a good step towards addressing the harm caused by the unconstrained growth of untrained emotional support animals (ESAs) on airplanes. In addition to the controls permitted under the interim guidance, DOT’s final guidance will give airlines further opportunity to ensure the health and safety of everyone on board, including the opportunity to evaluate ESAs in the airport lobby and the opportunity to prohibit animals that are younger than four months old (due to public behavior concerns).

In 2018, over a million passengers on U.S. airlines traveled with ESAs in the cabin, and as a result, both airports and airlines have seen a sharp increase in incidents caused by ESAs. These incidents have ranged from mauling and biting to urinating and defecating—all unacceptable behaviors on an airplane. This misbehavior not only threatens the health and safety of our passengers and crew, but also passengers with disabilities traveling with legitimate service animals. The transport of untrained animals through busy airports and fully booked aircraft may also put undue stress on the animals themselves. Online vendors have been all too willing to sell dubious credentials to passengers who are not disabled, helping spur the growth of fraudulent ESAs.

To be clear, we are not suggesting that DOT change the existing requirements for airlines to accommodate passengers with a disability and a trained service animal.

The DOT should protect the legitimate right of passengers with a disability to travel with a service animal and adopt the definition of service animal from the Americans with Disabilities Act (ADA). We thank DOT for the important work undertaken on this critical issue, recognizing that additional changes are needed to Section 382.117, and look forward to the eventual rule changes that will ensure a safer and healthier travel experience for all.

American Association of Airport Executives
American Kennel Club
American Service Dog Access Coalition
American Veterinary Medical Association
America’s VetDogs®
The Veteran’s K-9 Corps Inc.®

Air Line Pilots Association
Airlines for America
Airports Council International—North America
Allied Pilots Association
Assistance Canine Training Services
Assistance Dog International
Assistance Dogs of Hawaii
Assistance Dogs of the West
Association of Flight Attendants
Association of Professional Flight Attendants
Association of Service Dog Providers for Military Veterans
Bergin College of Canine Studies
Can Do Canines®
Canine Companions for Independence
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Canine Partners for Life
Canine Partners of the Rockies
CHAMP Assistance Dogs
Circle Tail
Duo Dogs, Inc.
Early Alert Canines
East Coast Assistants Dogs
Eyes Ears Nose & Paws
Fidelco Guide Dog Foundation, Inc.
Fidos for Freedom, Inc.
Freedom Service Dogs
Global Business Travel Association
Guide Dog Foundation
Guide Dogs for the Blind
Guide Dogs of America
Guide Dogs of Texas, Inc.
Guiding Eyes for the Blind Handi-Dogs’ Hawaii Fi-Do Service Dogs Helping Paws Indiana Canine Assistant Network International Air Transport Association International Association of Canine Professionals JLAD Service & Therapy Dog Training K9s 4 Mobility K9s for Warriors Leader Dogs for the Blind Leashes of Valor Mutts with a Mission My Blind Spot
National Air Carriers Association

NEADS World Class Service Dogs
Next Step Service Dogs
New Horizons Service Dogs, Inc.
Open Doors Organization Pacific Assistance Dogs Society (PADS)
Palmetto Animal Assisted Life Services
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Paws4people®
Paws Assisting Veterans
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Pet Industry Joint Advisory Council
Power Paws Assistance Dogs
Puppies Behind Bars Regional Airline Association Retrieving Freedom Inc.
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Service Dog Project Inc.
Smoky Mountain Service Dogs
Southeastern Guide Dogs
Southwest Airlines Pilots Association
Summit Assistance Dogs Susquehanna Service Dogs Tender Loving Canines Travelers United TWU Local 556 Union Veterans Council, AFL-CIO UDS Service Dogs Program World Institute on Disability