



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
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 Assistance Dog International
 Assistance Dogs of Hawaii



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 Association of Flight Attendants
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 Global Business Travel Association
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 Helping Paws
 Indiana Canine Assistant Network
 International Air Transport Association
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 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)
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 Travelers United
 TWU Local 556
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 UDS Service Dogs Program
 World Institute on Disability