



August 9, 2019

The Honorable Elaine L. Chao  
 Secretary  
 Department of Transportation  
 1200 New Jersey Ave., S.E.  
 Washington, DC 20500

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, recognition 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 Humane  
 (placeholder)  
 American Kennel Club  
 American Service Dog  
 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 Dogs  
 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  
 Canines for Service  
 Canine Partners for Life  
 Canine Partners of the  
 Rockies  
 CHAMP Assistance Dogs  
 Circle Tail  
 Duo Dogs, Inc.  
 Early Alert Canines  
 East Coast Assistants  
 Dogs  
 Educated Canines  
 Assisting with Disabilities  
 Eyes Ears Nose & Paws  
 Fidos for Freedom, Inc.  
 Freedom Service Dogs  
 Global Business Travel  
 Association  
 Guide Dog Foundation  
 Guide Dogs of Texas, Inc.  
 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  
 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  
 Patriot Paws Service Dogs  
 Paws4people®  
 Paws Assisting Veterans  
 Paws With A Cause®  
 Paws With Purpose  
 Pet Industry Joint Advisory  
 Council  
 Power Paws Assistance  
 Dogs  
 Puppies Behind Bars  
 Regional Airline  
 Association  
 Retrieving Freedom Inc.  
 Saint Francis Service Dogs  
 Service Dogs for America  
 Service Dogs of Virginia  
 Service Dogs, Inc.  
 Service Dog Project Inc.  
 Smoky Mountain Service  
 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

