

## Mandatory Pilot Retirement Age

Leading up to the **FAA Reauthorization Act of 2024 (HR 3935)** that was signed into law on May 16, 2024, Congress debated raising the mandatory pilot retirement age for Part 121 Airline Pilots to assist in the temporary pilot shortfall that occurred after COVID-19. Ultimately, the provision to raise the retirement age was not included in the final bill for multiple reasons we outline below. We applaud Congress for listening to the FAA, ICAO and many voices advocating against an unjustifiable age increase. However, recently, some Senators and Members of Congress have vowed to reopen the debate.

**PILOT SUPPLY ALREADY EXCEEDS DEMAND.** Raising the pilot retirement age would provide little to no benefit to overall workforce strength. In 2024 Spirit furloughed 330 pilots and downgraded 120 Captains back to First Officer; JetBlue is furloughing 130 pilots and downgrading 120 Captains to First Officer by January 2025; and all three major airlines (American, Delta, and United) slowed or stopped pilot hiring in 2024. This conclusively points to the current oversupply of pilots in the Part 121 system. Raising the retirement age was initially a solution to a 2022 pilot demand that exceeded supply post-COVID, when air travel demand went up significantly. ***This pilot shortage no longer exists in 2024.*** Raising the pilot retirement age is a solution in search of a problem.

**“DOMESTIC-ONLY” PILOTS.** Many pilots approaching retirement age are also the most senior pilots in their company. At American Airlines, just under half of all pilots ages 60-65 fly wide-body aircraft on international routes. ICAO rules prohibit pilots ages 65-67 from flying outside the 48 contiguous United States. This restriction would require retraining these senior international wide-body pilots at age 65 to fly narrow-body aircraft domestically only for the final hypothetical 24 months of their careers until age 67. These additional training events could exceed the capacity of the existing training systems. Note that the restriction on international flying even applies to Canada, Mexico, and the Caribbean, destinations largely served by narrow-body aircraft, further limiting age 65+ pilot productivity. Even if ICAO changed their age standard, that rule-making process would take several years. ***In 2007 when the US changed the pilot retirement age to 65 from 60, we did this to align our nation with the corresponding increase by ICAO that had already happened.*** To do this in the opposite order would create training chaos and an unnecessary funding burden on Part 121 airlines.

**INCREASED RATES OF LONG-TERM DISABILITY.** As an additional productivity consideration, current pilot workforce trends indicate a sharp, linear increase in the rate of absences for medical reasons beginning at age 55. At American Airlines for example, 71% of the total number of pilots on long term disability are over age 55, and 84% of them are over 50. Health problems increase as we age, and we see this in the reduced productivity of older pilots.

**COGNITIVE FUNCTION DECLINES AND RISK OF PILOT INCAPACITATION INCREASES AS PILOTS AGE.** Raising the retirement age would introduce additional risk due to age-related cognitive decline and potential for incapacitation. Cognitive performance declines throughout every person’s life, negatively affecting reaction time, spatial orientation, and problem-solving ability. A mandatory retirement age in

principle acts as a barrier to mitigate the risk that these symptoms of decline in pilots could become a threat to flight safety. While there is no inflection point in any of these metrics at age 65, the two years from 65 to 67 still represent an increase in risk for little return in pilot productivity. The European Union Aviation Safety Agency (EASA) recommended keeping the current retirement age because EASA found pilots older than 65 would create a burden due to additional required risk-mitigation measures and tests. Additionally, the risk of pilot incapacitation from age-related conditions such as heart attack and stroke also increases with age. Several recent close-call incidents at airports around the country point to the stress on our commercial aviation sector due to reduced Air Traffic Controller manning and increased throughput at major airports. These incidents suggest that adding even marginal risk into our system would be unwise.

**NO FAA DATA EXISTS TO SUPPORT THIS AGE INCREASE.** Current pilot flight time, duty time, and rest rules (FAR 117) are data-based for a pilot group with a maximum age of 65. The flight time, duty time, and rest rules in Part 117 of the Federal Aviation Regulations — as with many aviation rules — are “written in blood,” based on lessons learned from past fatal accidents. FAR 117 was written using multiple studies to determine safe maximum duty times with respect to likelihood of fatigue. Without further research toward updating FAR 117 rules to accommodate an increased retirement age, we would be “flying blind” and introducing added risk to the system. Additionally, according to the EASA, allowing pilots older than 65 years in multi-pilot commercial air transport (CAT) operations would require additional risk-mitigation measures such as specific tests to support the aeromedical decision on the individual applicant’s fitness to fly.

**NO INCREASE IN SERVICE TO RURAL COMMUNITIES.** Raising the retirement age would have little to no effect on air service to rural communities, which is driven primarily by economic factors. The primary factor at play to determine network service is economics, and the airlines themselves say so. “You can’t afford to be flying people someplace where it costs you more to fly them than you’re getting paid for it,” Nick Calio, president and CEO of Airlines for America, said in September 2022 during a CBS News town hall. Relics of a non-viable business model, the 50-seater regional jets that have historically served the smallest communities, are unpopular with passengers and airlines alike, and many are being permanently parked. Congress may look at expanding the Essential Air Service program to return service to some markets. However, pilot staffing cannot and will not drive the economic calculus employed in route planning. To wit, even if airlines had more pilots, they would likely use them to add capacity to their most profitable routes. Blaming the lack of air service to rural communities on a pilot shortage that no longer exists is misleading and harmful, as it distracts and deters small community leaders from addressing alternative access concepts.

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