



MEMORANDUM

To: All American Mechanic and Related, Stores, and Fleet Service Employees
Represented by the TWU/IAM Association

From: Joshua M. Javits, Neutral

Date: December 27, 2016

Subject: Seniority Integration Report and Recommendations and Proposed
Integrated Lists

Based on my investigation and analysis, I am submitting my Report and Recommendations regarding the integration of seniority lists for Mechanic and Related, Stores, and Fleet Service employees of pre-merger American Airlines (“LAA”) and US Airways (“LUS”) which is attached together with the proposed integrated seniority lists. As explained in my Report, I believe that the accompanying integrated lists achieve a fair and equitable seniority integration consistent with the law and the parties’ Agreement Regarding Seniority List Integration dated April 24, 2013 (“SLI Agreement”). The attached chart summarizes the recommendations contained in my Report.

The Report and Recommendations reflect the information and insight gained through my investigation, including the fact-finding/mediation sessions I conducted with representatives from the TWU/IAM Association, as well as the over 800 written comments I received from members. I am pleased to report that the vast majority of employees involved in this seniority integration process should see little, if any, change in their seniority status as a result of the merging of seniority lists. As set forth in the attached chart and explained in detail in my Report, in most instances employees will continue to use the same date that they currently use for bidding purposes. In accordance with the SLI Agreement, to the fullest extent possible, employees have been integrated based upon their date of entry into their classification, which is equivalent to the Occupational Seniority date for LAA employees and the Classification Seniority date for LUS employees.

My Report also addresses how to break ties between LAA and LUS employees who share the same date of entry into classification. Applying the principles agreed to in the 2013 SLI Agreement, a tie between a single LAA employee and a single LUS

employee is broken first by hire date and, if necessary, by the last four digits of each employee's social security number. In the case of ties involving multiple LAA and LUS employees, a ranking method based upon the last four digits of employees' social security numbers has been adopted in order to preserve the current tie-breaking order at each pre-merger Carrier. This method is explained in detail in my Report at pages 31-34 and was used to integrate the accompanying lists.

Although date of entry into classification has been used to integrate seniority for the vast majority of employees, in a few circumstances the fair and equitable integration of seniority required a different approach. I found that the integration of seniority for Mechanic and Related and Stores employees working in premium or crew chief/lead classifications could not be resolved simply through the integration of dates of entry into classification. At LAA, employees working in premium or crew chief positions used their basic classification dates for bidding purposes. However, LUS Mechanic and Related and Stores employees established separate seniority dates when they first worked in a premium or lead classification and used this date for bidding purposes. Given the very different approach to the use of premium seniority at the two pre-merger Carriers, I determined that the fairest way to integrate seniority for the purpose of bidding in premium positions is to first rank all employees according to their basic classification dates and then second to place LUS employees in this ranking in the order which they currently use for bidding in premium positions so that the relative position among them remains unchanged. This ranking method is described fully on pages 34-39 of my Report and is reflected on the applicable lists.

I also adopted a similar ranking method in order to integrate the seniority of some LAA employees who became union-represented for the first time as a result of the merger. As explained in my Report at pages 39-44, seniority for these previously unrepresented LAA employees was determined by Company policy and was generally based upon length of service with the Company, not date of entry into classification. Through the use of a ranking method, the previously unrepresented employees can be integrated using their current seniority dates without disadvantaging other employees in the same work groups.

Lastly, my report responds to some of the comments that I received from individual members, including a number of former TWA employees, requesting adjustments to their seniority dates to correct for past seniority practices which they view as unfair. As I explain at pages 45-58, it would be inappropriate to make such adjustments to seniority as part of the present integration process. To attempt to restore seniority now would require rewriting history and would upset the settled expectations of other employees with their own unique histories, whose relative position on the seniority lists would be impacted.

As agreed between the TWU/IAM Association and the Company, affected employees may submit for my determination individual protests regarding their placement on the integrated seniority lists by no later than February 10, 2017. All protests should be sent by mail or email addressed as follows:

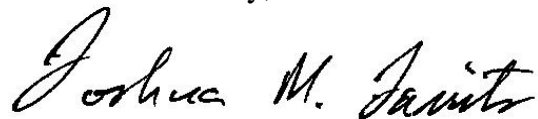
Attn: Neutral Joshua M. Javits
c/o Guerrieri, Clayman, Bartos & Parcelli, P.C.
1900 M Street, N.W., Suite 700
Washington, DC 20036

JavitsSeniority@geclaw.com

Each protestor must include the following information: full name, employee number, job title, station, and a clear statement of the basis for the protest. The failure to include this information may prevent me from conducting a complete investigation of the protest. Employees should also include any documents which they believe are relevant. I will consider all timely and complete protests and issue a final and binding determination with respect to each. At the conclusion of the protest process, I will issue final integrated seniority lists, incorporating any necessary changes resulting from my protest determinations.

I look forward to continuing to work with the TWU/IAM Association to successfully finalize this seniority integration process.

Yours truly,

A handwritten signature in black ink that reads "Joshua M. Javits". The signature is written in a cursive, flowing style.

Joshua M. Javits

TWU/IAM ASSOCIATION SENIORITY INTEGRATION
JAVITS REPORT - SUMMARY CHART

<u>Classification</u>	<u>Basic Seniority</u>	<u>Premium Classification Seniority</u>
Aircraft Maintenance Technician (“Title I”)	Integrated by date of entry into classification, which is equivalent to LAA employees’ Occupational Seniority date and LUS employees’ Classification Seniority date. <i>Report at 29-30.</i>	LAA and LUS employees working in premium classifications (<i>i.e.</i> lead/crew chief or inspector) first placed in order of Occupational Seniority dates and Basic Classification Seniority dates. Then LUS employees slotted into integrated list in pre-merger order of Premium Classification dates. <i>Report at 34-39.</i>
Ground Service Equipment and Plant Maintenance (“Title II”)	Integrated by date of entry into classification, which is equivalent to LAA employees’ Occupational Seniority date and LUS employees’ Classification Seniority date. <i>Report at 29-30.</i>	LAA and LUS employees working in premium classifications (<i>i.e.</i> lead/crew chief) first placed in order of Occupational Seniority dates and Basic Classification Seniority dates. Then LUS employees slotted into integrated list in pre-merger order of Premium Classification dates. <i>Report at 34-39.</i>
Utility	Integrated by date of entry into classification, which is equivalent to LAA employees’ Occupational Seniority date and LUS employees’ Classification Seniority date. <i>Report at 29-30.</i>	LAA and LUS employees working in premium classifications (<i>i.e.</i> lead/crew chief) first placed in order of Occupational Seniority dates and Basic Classification Seniority dates. Then LUS employees slotted into integrated list in pre-merger order of Premium Classification dates. <i>Report at 34-39.</i>
Maintenance Control Technician	Integrated by date of entry into classification, which is equivalent to LAA employees’ Occupational Seniority date and LUS employees’ Classification Seniority date. <i>Report at 29-30.</i>	Not applicable.
Maintenance Training Specialist	LUS MTS, LAA Technical Crew Chiefs performing MTS work, and previously unrepresented LAA MTS first placed in order of Company Seniority dates. Then LUS MTS and LAA Technical Crew Chiefs slotted into integrated list in pre-merger order of Classification Seniority/Occupational Seniority dates. <i>Report at 43-44.</i>	Not applicable.

Quality Assurance	LUS QAs and previously unrepresented LAA QAs first placed in order of Company Seniority dates. Then LUS QAs slotted into integrated list in pre-merger order of Classification Seniority dates. <i>Report at 42-43.</i>	Not applicable.
Planner/Technical Document Specialist	LUS Planners and Tech Docs and previously unrepresented LAA Planners and Tech Docs first placed in order of Company Seniority dates. Then LUS Planners and Tech Docs slotted into integrated list in pre-merger order of Classification Seniority dates. <i>Report at 42-43.</i>	Not applicable.
Stores	Integrated by date of entry into classification, which is equivalent to LAA employees' Occupational Seniority date and LUS employees' Classification Seniority date. <i>Report at 29-30.</i>	LAA and LUS employees working in premium classifications (i.e. lead/crew chief or inspector) first placed in order of Occupational Seniority dates and Basic Classification Seniority dates. Then LUS employees slotted into integrated list in pre-merger order of Premium Classification dates. <i>Report at 34-39.</i>
Fleet Service	Integrated by date of entry into classification, which is equivalent to LAA employees' Occupational Seniority date and LUS employees' Classification Seniority date. Previously unrepresented LAA Weight and Balance Planners and Tower Planners integrated using Employment Seniority dates. <i>Report at 29-30, 40-41.</i>	Not applicable.

Tie-Breaking: When a single LAA and a single LUS employee share the same seniority date, the tie is broken first by date of hire and, if necessary, by the last four digits of the employees' social security numbers. For ties involving multiple LAA and LUS employees, tied employees are first placed in order of the last four digits of their social security numbers and then slotted into the integrated list in their respective pre-merger tie-break orders. *Report at 31-34.*