



**ASSOCIATION OF FLIGHT ATTENDANTS - CWA, AFL-CIO**  
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December 4, 2018

Dee Dee Caldwell, Director – Inflight Operations & Labor Relations  
Horizon Air - Flight Attendant  
System Board of Adjustment  
8070 NE Airtrans Way  
Portland, OR 97218

Liz Montgomery, AFA Horizon Flight Attendant  
System Board of Adjustment **(VIA EMAIL)**

**RE: AFA Case No: 06-99-02-21-18**

**MEC: Credit Sort**

Dear System Board of Adjustment Members:

In the Agreement between Horizon Air Industries, Inc. and the Flight Attendants in its service, as represented by the Association of Flight Attendants - CWA, AFL-CIO, covering the establishment and maintenance of a Flight Attendant System Board of Adjustment, effective May 1, 2017, there appears the following paragraph:

“Failing settlement at an earlier step, any grievance may be forwarded in writing to the Board of Adjustment within thirty (30) calendar days of its denial at the previous step, or, by mutual agreement, directly to Arbitration.”

Herewith is submitted for consideration and decision by the above-referenced Board, the grievance of the Master Executive Board.

**1. Question or Questions at issue:**

Whether the Company violated Section 7 d.3, and any and/or all related sections of the collective bargaining agreement? If so, what shall be the remedy?

Inflight management has denied the MEC grievance with the stance that the Reserve Credit Sort List is now being pushed by IT “as if as in real time.” Management does not provide a timeline on when this alleged fix took place or how often the push for the refresh occurs from IT to AIMS. Management’s response is suggestive of “real time” updates to the Reserve Credit Sort list but not stated so implicitly. Additionally, the grievance filing is noted as continuing and even if we were to accept management’s position in their grievance response, there is still the matter of the months and days that the system did not reflect real time updates to the Reserve Credit Sort list.

The MEC does not have enough information to make a threshold determination of a fix to the Reserve Credit Sort list being updated in real time nor do we have a date and time of “alleged” said fix. Additionally, management denies the grievance even though they admit in the grievance worksheet that a violation existed.

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**2. Statement of Facts:**

On November 20, 2018, the grievance was duly filed. (Submission Exhibit #1, attached.) The grievance was denied by Dee Dee Caldwell on December 3, 2018. (Submission Exhibit #2 attached). This decision being unsatisfactory, the matter is herewith submitted to the System Board of Adjustment for final hearing and determination.

**3. Position of the Union:**

It is the position of the Union that the Company's actions were without just cause, and in violation of the Collective Bargaining Agreement.

WHEREFORE, the Union requested that the Board render a decision;

- a. that the Company's actions were without just cause;
- b. that the Company is in violation of the contract;
- c. that the affected flight attendants(s) be reimbursed for all monies lost due to the Company's actions;
- d. that the grievant have such other, further, or different relief as this Board may deem just and proper.

**4. Position of the Company:**

It is presumed that the position of the Company is as set forth in the Statement of Facts as Submission Exhibit #2. If such is not the position of the Company, or if the Company wishes to amend or supplement its position, it is requested to do so in writing to this Board upon receipt of a copy of this Letter of Submission.

It is respectfully requested that this case be heard at the Board's next regular or special session.

Sincerely,



Sara Nelson  
AFA-CWA International President

SN:dl

Attach(s)

cc: Ed Hawes, MEC President & MEC Grievance Chair  
Heather Coleman, LEC 16 President  
Kirk Hansen, LEC 17 President & Grievance Chair  
Taylor Ball, Esquire  
Kimberley Chaput, Esquire - AFA Senior Staff Attorney  
Deborah Lynch, AFA Legal Department