



AMFA–Southwest Airlines AMT Contract Negotiations Update

Update #72 February 3, 2019

Dear AMFA Brothers and Sisters:

After six and a half years of negotiations and a tentative agreement rejected by the membership, Southwest Airlines continues to delay and obstruct as opposed to negotiate in good faith.

As you will recall from Update #71, your Negotiating Committee delivered a comprehensive information request to the Company at the conclusion of our last session, which was designed to elicit all relevant information in the Company's possession regarding its newly expressed desire to, once again, send maintenance to international vendors.

On Friday, February 1, your Negotiating Committee received the Company's response to our information request, which included zero documents and not a single point of data, thus preventing our economist the ability to cost and evaluate the Company's proposal to return offshore with our maintenance work. Would Southwest make a million-dollar business decision without analyzing the cost of that decision in advance? We think not. We advised the Company, in no uncertain terms, we could not negotiate over this proposal in the dark – without the data and information needed to properly evaluate the cost of the Company's proposal and its effect on you, the membership.

We have included our original information request followed by the Company's non-response for your review. We are confident once you review, you will draw the same conclusion as your Committee – here we are, no raises for 6.5 years and the games continue. Enough is enough – Southwest must stop the games and start negotiating in good faith.

Sincerely,

Your Negotiating Committee



AIRCRAFT MECHANICS FRATERNAL ASSOCIATION
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Tel: 303.752.AMFA (2632) • Fax: 303.362.7736

January 25, 2019

Mr. Adam Carlisle
Sr. Director, Labor Relations
Southwest Airlines Co.
2702 Love Field Drive
Dallas, TX 75235

**Sent via E-mail [Adam.Carlisle@wnco.com]
and Hand Delivery**

Re: Information Request in Support of Collective Bargaining

Dear Mr. Carlisle:

On January 24, 2019, Southwest Airlines (“SWA” or “Company”) proposed a complete deletion of Paragraph 9, Article II of the AMFA-SWA CBA. In connection with the Company’s proposal, Southwest advised AMFA it desired to have aircraft maintenance performed by international vendors, including but not limited to the Aeroman facility in El Salvador.

AMFA explained to the Company Committee that it would need detailed information related to the Company’s proposal. Therefore, AMFA requests that Southwest provide the following information no later than close of business on **Friday, February 1, 2019**.

1. Any and all Requests for Pricing (“RFP”) issued by Southwest to any and all Maintenance Repair Organization (“MRO”), Aircraft Essential Maintenance Providers (“AEMP”) or any and all third-party maintenance providers from January 1, 2015 until present;
2. Any and all responses from MRO’s, AEMP’s or any and all third-party maintenance providers issued in response to Southwest RFP’s from January 1, 2015 until present;
3. Any and all contracts and/or agreements entered into between Southwest and any and all MRO’s, AEMP’s or any and all third-party maintenance providers from January 1, 2015 until present whether said contracts and/or agreements were entered into prior to January 1, 2015 or otherwise;
4. Any and all MRO, AEMP or any and all third-party maintenance provider semi-annual review document(s) and/or presentation(s) produced by Southwest Field Services Department and/or any other Southwest department from January 1, 2015 until present;
5. Any and all documents, which detail Southwest’s forecast plan for the Company’s internal and/or external maintenance footprint, which includes but is not limited to, any and all forecasted heavy lines of maintenance;
6. Any and all documents and/or presentations utilized internally and/or externally by Southwest that relate to the Company’s actual or intended use of any and all MRO’s

AEMP's or any and all third-party maintenance providers from January 1, 2015 until present.

The AMFA-Southwest Negotiating Committee reserves the right to add to and/or supplement this request for information as it may determine additional and/or supplemental needs for information related to this issue. This information is vital to the AMFA-Southwest Negotiating Committee's ability to analyze and evaluate the Company's current proposal; and therefore, we respectfully request the Company respond promptly and in a comprehensive fashion so as to not further delay the collective bargaining process.

Sincerely,



Earl Clark
Region I Director
Negotiating Committee Co-Chair



Will Abbott
Region II Director
Negotiating Committee Co-Chair

Cc: Lucas K. Middlebrook, Esq., AMFA Counsel [By e-mail]
Bret Oesterich, National Director, AMFA [By e-mail]
Peter Manikowski, AMFA Economist [By e-mail]
Craig Hamlet, Local 11 ALR [By e-mail]
Wayne Lampley, Local 18 ALR [By e-mail]
Ken Patrick, Local 32 ALR [By e-mail]
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February 1, 2019

Via Email

Earl Clark and Will Abbott
AMFA Negotiating Committee Co-Chairs
7853 E. Arapahoe Court, Suite 1100
Centennial, CO 80112

Re: *Information Request dated January 25, 2019*

Dear Mr. Clark and Mr. Abbott:

I write this letter in response to your letter dated January 25, 2019, in which you request a number of documents and other information.

As an initial matter, and as I am sure you are aware, we have no obligation under the Railway Labor Act or otherwise to produce the documents and information identified in the requests. Moreover, the requests seek documents and information that are proprietary and confidential – not only to Southwest, but to our vendors. For this reason, a significant portion of the documents and information sought are governed and protected by non-disclosure agreements.

Additionally, after carefully considering the substance of the requests, they appear to seek documents and information that are not relevant or necessary to evaluate our proposal, and they are overly broad and unnecessarily burdensome. For example, it is not apparent to us why the entirety of “any and all contracts” with every maintenance vendor for the previous three years, in addition to all requests for proposals and responses to same, are necessary in order to place a value upon our proposal related to outsourcing to international vendors.

That said, we are happy to continue to discuss with you the reasons for and help you to understand the value associated with our proposal related to international outsourcing, and we certainly anticipate addressing the relevant topics identified by the request. As a result, we plan on making our subject matter experts in this area available at our next negotiation meetings scheduled for February 7th and 8th to provide you with further context and insight into the information that will be helpful in order for you to better understand and properly evaluate our proposal. Of course, if after those meetings you have any additional questions or need additional specific information, we will be happy to continue discussions and consider any such requests at that time.

Please let me know if you have any questions or if you would like to discuss this further in advance of our February 7th and 8th meetings. We look forward to returning to the bargaining table and continuing to work to together to come to an agreement that is satisfactory to both sides.

Sincerely,

A handwritten signature in black ink, appearing to read 'Eddie Berbarie', with a long, sweeping horizontal stroke extending to the right.

Eddie Berbarie

cc: Mediator Catherine McCann, *via email*
Lucas Middlebrook, *via email*