

The date that the letter will be postmarked.

January 27, 2014

Your representative's name and address.

The Honorable **Firstname Lastname**  
Address 1  
Address 2  
Washington, DC 20510 /5

**Congressman**  
**Congresswoman**  
or  
**Senator**

Re.: Hiring of air traffic controllers, cancellation of CTI/AT-SAT consideration

Dear **Salutation Lastname**,

Your name

My name is **Firstname Lastname**. I am writing today concerning sudden, costly changes in the FAA's hiring plan for new air traffic controllers, with specific regard to the abrupt disregard for CTI students. At **Name of School**, I have spent the past **X** years—and thousands of dollars—in the FAA's Air Traffic-Collegiate Training Initiative (AT-CTI) program. The CTI program has, for a quarter of a century, been the primary means for the preparation of aspiring controllers. Solid proof has been given on numerous occasions—both through FAA reports and third-party studies—that the CTI program produces qualified, capable controllers who go on to experience great success in careers as controllers with the FAA. Nevertheless, on December 30<sup>th</sup>, 2013, the FAA announced, without warning, that they were abandoning this method of hiring almost entirely, by announcing a new off-the-street hiring program. The reasons behind this change are suspicious, and the change itself is contrary to a great wealth of information which suggests that it cannot be of benefit to the government, the applicant, or the nation.

In brief, the new off-the-street hiring will not consider whether a person is a graduate of a CTI school, and will not consider the applicant's score on an aptitude test (the AT-SAT) which was specifically designed to determine—and has been shown to be an excellent predictor of—the suitability of applicants. Rather, a "biographical questionnaire" is to be introduced. These changes are pursuant to a Barrier Analysis which was conducted in recent years—itsself an odd notion. If you refer to Page 44 of the FAA's *A Plan for the Future 10-Year Strategy for the Air Traffic Control Workforce 2013-2022*, you will find that the FAA's goal is to maintain a pool of 2000-3000 applicants at any given time. At the end of FY2012, that pool contained more than 5000 persons—many of them CTI graduates. What, then, motivated the Barrier Analysis which prompted the new hiring protocols?

The Barrier Analysis was the latest attempt of many, over the years, to understand why the air traffic workforce is less diverse than is ideal. In so attempting, the conclusion appears to have been reached that the FAA should seek out new applicants **explicitly** on the basis of race, *et alia*. To quote from page 152 of the Barrier Analysis itself, "[Race and National Origin] and gender diversity should be explicitly considered when determining the sources for the applicants..."

This recommendation resulted from the analysis' finding that 4 of 7 hiring phases resulted in adverse action against minorities. But adverse action is not a term to be used lightly. It is, specifically, any action taken in the employment process which **results** in discriminatory hiring practices. One of several mistakes made by Dr.s Outtz and Hanges in the Analysis (a report

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*Be sure to go through the entire letter! There is some red text on pages 2 and 3!*

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which concludes, on page 155, by stating that the Analysis “was rendered unacceptable” due to extreme time limitations) was to confuse correlation for causation. Yes, there are problems with diversity; no, the FAA’s hiring process is not the cause of them. As the Analysis itself shows, as Page 16 of the *FAA Independent Review Panel on the Selection, Assignment and Training of Air Traffic Control Specialists* clearly expresses (an air traffic control trainer urging, “Please do not send me any more public hires”) and as can be found in **any** of the investigations into the validity of the AT-SAT battery of aptitude tests, the existing hiring process of utilizing CTI schools coupled with AT-SAT testing produces highly successful and qualified candidates who invariably outperform off-the-street hires and even persons with veterans referrals. It is quantifiably, unmistakably, outstandingly clear that the CTI program is successful, that the AT-SAT is an outstanding predictor of excellence, and that there are thousands of qualified candidates ready and waiting to be hired from this combination.

And yet, the FAA has chosen, for all intents and purposes, to abandon all of this.

**Sir/Madam**, it is a noble goal to ensure diversity in the workplace. The new hiring program appears to be a last-ditch effort at achieving this diversity against all odds. I do not know why diversity is problematic, but I do know three things:

Firstly, the AT-SAT exams and CTI schools are not the causes of problems in diversity. Attempt after attempt to modify hiring processes and reweight test scores have failed because, in the final product, when it comes to only hiring those who, when all is said and done, are most capable, the adverse impact still remains. Something cultural—something fundamental—is the cause of these problems, not FAA hiring policy.

Secondly, I have spent tens of thousands of dollars going to school because it was made very clear that that was the preferred, and at times only, method of becoming an air traffic controller. The 36 CTI schools have invested millions of dollars in designing curricula, hiring instructors (often former controllers) installing simulators and equipment, and coordinating internships with ATC facilities. Now, all of that investment appears to have been for naught.

Thirdly, “explicitly” considering applicants on the basis of race, national origin, or gender—and especially when doing so instead of on the basis of their relevant educational background or aptitude test scores—is not only discriminatory, but potentially dangerous, inasmuch as it aims to diversify a workforce by looking at non-relevant traits before, and instead of, those which have been shown, over and over, to matter significantly.

Please look into these matters, please encourage the FAA to provide preferential treatment for CTI graduates as they have in the past, and please consider the following points in so doing:

- Off-the-street hiring has been shown, repeatedly and concretely, to be less effective than hiring CTI graduates.
- Off-the-street hiring is more expensive for the FAA, as it must train new hires “from scratch”, including costs sunk in those who fail the training program.

- Without requiring a college degree, as the CTI program now does, the new hiring scheme lowers standards in general. A person who failed out of college in the CTI program is now eligible, provided they have three years of work experience.
- The FAA's website has, for years, made very clear that the only paths into air traffic control are prior experience or the CTI program. This clearly implies some significance to the CTI program and has, thus, been enormously misleading for the thousands of students who have invested in that program—most of them borrowing huge sums of money from the federal government to finance their educations (in other words, the result of this new hiring scheme is direct, quantifiable, and substantial harm to thousands of young Americans).
- The FAA misled the 36 CTI schools, who now find that substantial portions of their educational frameworks serve no purpose. The cancellation of a program is not, in itself, offensive. Doing so without advanced notice, and for reasons not only dubious but, indeed, proven to be ineffective, is strikingly unethical and distasteful.
- The Barrier Analysis contains numerous mathematical and typographical errors, likely due to the aforementioned acknowledgement by the analysis' authors that it was rushed and that such hurrying compromised its usefulness.
- The Barrier Analysis, in finding adverse impact, appears to omit several enormously important considerations. It refers to and appears only to consider 4-year degrees or 4-year schools, yet 15 of the 36 CTI schools offer two-year degrees (which the FAA has found perfectly suitable for hiring) and many are community colleges. In other words, the diversity represented in CTI schools is greater than the Analysis indicates.
- The new hiring scheme was presented without consulting stakeholders. In itself, this suggests underhanded dealings, as it is clear that had involved and invested parties been participants in the discussion, the myriad concerns and problems mentioned here would have been brought to light sooner.
- It very much appears that some small contingency within the FAA, or some party presenting external pressure, has influenced the decision-making process in an irrational, irresponsible, and legally questionable manner. The new hiring scheme is clearly targeted at meeting racial quotas, which, otherwise known as racism, is patently immoral and quite likely impermissible.

Sincerely,

Firstname Lastname