



October 9, 2019

Mr. Barry K. Biffle
Chief Executive Officer
Frontier Airlines
4545 Airport Way
Denver, CO 80239

Dear Mr. Biffle,

32 million Americans suffer with life-threatening food allergies. We would like to open a dialogue between FARE and Frontier Airlines about serious safety issues [impacting passengers](#) with food allergies during air travel. We ask that each carrier adopt simple policies to ensure that whenever these passengers fly, they can do so secure in the knowledge that reasonable steps have been taken to prevent or treat life-threatening allergic reactions.

This is not an abstract concern-lives are at risk. Earlier this summer, an airline passenger began experiencing [a life-threatening allergic reaction to food ingested 30,000 feet above the Atlantic Ocean](#). There was no epinephrine auto-injector on-board. Had it not been for a doctor stepping forward who was trained to administer vialed epinephrine, the passenger may not have received the care required to survive. [There has also been reporting in the recent days about airplanes flying without any epinephrine on board at all.](#)

FARE Wants to Work Collaboratively with the Airline Industry

While addressing these issues through legislation, as some members of Congress have discussed, is one option, FARE's clear preference at this stage is to engage in a constructive, good faith dialogue so we can collectively and cooperatively develop voluntary policies and procedures to accommodate food allergy passengers.

We ask that you take the following actions:

1. Stock an epinephrine auto-injector on board every plane. We are aware that some airlines have cited the recent shortage of auto-injectors as a reason not to take this step, but this reflects a lack of understanding about the growing competition in the market. In fact, a number of new branded and/or generic epinephrine auto-injector products have been recently approved by the FDA, and we believe that the market is well positioned to provide access and availability to these life-saving, easy to administer products; and,
2. Comply with a recent Department of Transportation ruling that requires airlines to permit persons with life-threatening food allergies to pre-board to wipe down seating surfaces and tray tables and reduce exposure to lingering allergens.



Food allergies in the United States have reached epidemic proportions. This public health crisis now affects more than **32 million** Americans—roughly 10 percent of the population. According to FARE research, insurance claims with diagnoses of life-threatening anaphylactic food reactions rose nearly 400 percent nationwide between 2007 and 2016. It should be especially worrisome to airlines that a recent paper published in JAMA Network Open found 10 percent of adults in the U.S. — over 26 million — are estimated to have food allergy, and about half of those said they developed at least one new food allergy as an adult that they didn't have as a child!

Given the many risks to so many of our fellow citizens, we should do everything possible to protect those with food allergies, and airlines need to do their part. Adopting the policies above fulfills that obligation and makes airline travel safer for all passengers.

All Airplanes Must Stock Epinephrine Auto-Injectors

As you know, the FAA has issued guidance advising airlines that they are permitted to carry epinephrine auto-injectors on-board aircraft. However, most airlines only stock vials of the drug and not the easy-to-use, precisely dosed auto-injectors. This practice raises two significant problems that could prove fatal. First, epinephrine vials often contain dosages that are inconsistent with what is needed to treat an anaphylactic food allergy reaction. And second, most Americans do not know the proper dose of epinephrine to administer, nor do they know how to safely and properly do so without an auto-injector which administers the exact dosage needed to prevent an anaphylactic reaction. Unfortunately, these are no substitute for auto-injectors and, indeed, if there is not a trained medical professional on board who knows how to adapt these vials to administer the precise dose required to neutralize an anaphylactic reaction, the results could be fatal.

FARE understands that some airlines had to make adjustments to their practices when we faced a shortage of epinephrine auto-injectors. The good news is that the FDA has fast tracked more auto-injector options with sufficient market supply and FARE would be happy to assist you to engage with the manufacturers. In addition, our understanding is that there are about 7,200 aircraft in the entire U.S. commercial airline fleet. With current expanded options and availability, we believe it is feasible for each carrier to acquire the relatively small number of epinephrine auto-injectors required to meet our goal. FARE is also writing to each manufacturer asking them to join this voluntary, cooperative dialogue as we believe joint efforts can lead to a speedy solution that works for all parties, but especially the 32 million Americans with food allergies.



All Airlines Must Allow Those Impacted by Life-Threatening Food Allergies to Pre-Board

As you also know, in 2019, the U.S. Department of Transportation issued an order indicating that passengers with life-threatening food allergies are considered qualified passengers with a disability for purposes of the Air Carrier Access Act (AACAA), and that they must be allowed to preboard to allow extra time to wipe down seating surfaces. We request that you respond to this letter with explicit information on how your carrier plans to comply with this order, and that you publish these guidelines on your website. We stand ready to help you develop these policies.

Next Steps:

We ask that you agree to start this conversation with the goal of 1) complying with Department of Transportation order and, 2) implement a policy to ensure epinephrine auto-injectors are on board all your planes before the busy holiday travel season begins. Now is the time to take steps to prevent the worst-case scenario from happening: a fatal anaphylactic reaction on an airplane due to the lack of proper medical equipment.

I look forward to working with you on this request and appreciate the opportunity to move forward to ensure 32 million airline passengers can fly safely. If you have any questions, please feel free to call me anytime at 703-563-3074.

Sincerely,

Lisa Gable
Chief Executive Officer
Food Allergy Research & Education (FARE)

cc: Trista Miller- Director of Consumer Service