



NATIONAL MEDIATION BOARD

1301 K St NW, Suite 250E
Washington, DC, 20005

In the Matter of the Application of

ASSOCIATION OF FLIGHT
ATTENDANTS-CWA,
AFL-CIO

alleging a representation dispute
pursuant to Section 2, Ninth, of the
Railway Labor Act, as amended

involving employees

ALASKA AIRLINES, INC./
HAWAIIAN
AIRLINES, INC.

52 NMB No. 29

CASE NO. R-7651
(FILE NO. CR-7258)

FINDINGS UPON
INVESTIGATION – SINGLE
CARRIER DETERMINATION

March 6, 2025

This determination addresses the application filed by the Association of Flight Attendants–CWA, AFL-CIO (AFA-CWA). AFA-CWA requests the National Mediation Board (NMB or Board) investigate whether Alaska Airlines, Inc. (Alaska) and Hawaiian Airlines, Inc. (Hawaiian) (collectively the Carriers or Combined Carrier) are operating as a single transportation system for the craft or class of Flight Attendants.

The investigation establishes that Alaska and Hawaiian constitute a single transportation system.

PROCEDURAL BACKGROUND

On November 5, 2024, pursuant to the NMB’s Merger Procedures and NMB Representation Manual (Manual) Section 19.3, the Carriers notified the Board that, on September 18, 2024, Alaska Air Group, Inc. (AAG), parent of Alaska, and Hawaiian Holdings, Inc. (HHI), parent of Hawaiian, implemented their December 2, 2023 Agreement and Plan of Merger (Merger Agreement), resulting in “AAG’s acquisition of 100 percent of the outstanding shares of [HHI].” On November 18, 2024, AFA-CWA filed an application alleging a representation dispute involving the craft or class of Flight Attendants at the Combined Carrier.

The Flight Attendants craft or class is represented by AFA-CWA at Alaska under the Board’s certification in NMB Case No. R-3477.¹ The AFA-CWA also represents the Flight Attendants craft or class at Hawaiian under the Board’s certification in NMB Case No. R-3515.²

The Board assigned John S.F. Gross to investigate and requested that the Carriers provide information regarding their operations. On December 3, 2024, the Investigator granted the Carriers’ request for a one-week extension of time to submit a position statement and the information requested by the Board. On December 4, 2024, the Carriers submitted the requested information, and on December 13, 2024 submitted a position statement. AFA-CWA filed a position statement with its application and filed an additional statement on December 27, 2024 in response to the Carriers’ December 13, 2024 submission.

ISSUE

Are Alaska and Hawaiian operating as a single transportation system? If so, what are the representation consequences?

CONTENTIONS

AFA-CWA

AFA-CWA states that the Carriers satisfy the NMB’s requirements for a single transportation system for the craft or class of Flight Attendants.

¹ In 1961, the Air Line Pilots Association, International (ALPA) was certified to represent Flight Attendants on Alaska in NMB Case No. R-3477. The Board transferred that certification in R-3477 to AFA and later transferred that certification to AFA-CWA in 2004. *Alaska Airlines*, 31 NMB 151 (2004). In 2017, AFA-CWA’s certification in R-3477 was extended by the Board to cover the Flight Attendants craft or class on the single transportation system resulting from Alaska’s merger with Virgin America. *Alaska Airlines/Virgin America*, 44 NMB 63 (2017) (NMB Case No. R-7478).

² In 1961, the Air Line Pilots Association, International (ALPA) was certified to represent the Flight Attendants at Hawaiian. (NMB Case No. R-3515). On November 16, 1977, the Board transferred the certification in R-3515 to AFA. In 2004, the certification issued to AFA in R-3515 was transferred to AFA-CWA. *Hawaiian Airlines*, 31 NMB 213 (2004).

The Combined Carrier

The Combined Carrier states that, while complete integration of flight operations will not be possible until the Federal Aviation Administration (FAA) issues a single operating certificate (expected by October 2025, according to the Combined Carrier), it has substantially integrated operations, financial control, and labor and personnel functions, and therefore constitutes a single transportation system within the meaning of the Board's case law.

FINDINGS OF LAW

Determination of the issues in this case is governed by the Act, as amended, 45 U.S.C. § 151, et seq. Accordingly, the Board finds as follows:

I.

Alaska and Hawaiian are common carriers as defined in 45 U.S.C. § 181, First.

II.

AFA-CWA is a labor organization and/or representative as defined in 45 USC § 151, Sixth, and § 152, Ninth.

III.

45 U.S.C. § 152, Fourth, gives employees subject to its provisions, "the right to organize and bargain collectively through representatives of their own choosing. The majority of any craft or class of employees shall have the right to determine who shall be the representative of the craft or class for purposes of this chapter."

IV.

45 U.S.C. § 152, Ninth, provides that the Board has the duty to investigate representation disputes and to designate who may participate as eligible voters in the event an election is required. In determining the choice of the majority of employees, the Board is "authorized to take a secret ballot of the employees involved or to utilize any other appropriate method of ascertaining the names of their duly designated and authorized representatives . . . by the employees without interference, influence, or coercion exercised by the carrier."

STATEMENT OF FACTS

Background

Prior to the merger, Alaska was a wholly-owned subsidiary of AAG, headquartered in Seattle, Washington. It was the fifth largest airline in the United States. Alaska and its regional partners served 125 destinations across the U.S. and the Bahamas, Belize, Canada, Costa Rica, Guatemala, and Mexico. Alaska operated from hubs in Seattle, San Francisco, Los Angeles, Portland (Oregon) and Anchorage.³ Hawaiian was a wholly-owned subsidiary of HHI, headquartered in Honolulu, Hawaii. Hawaiian was Hawaii's biggest and longest-serving airline, offering approximately 150 daily flights within the Hawaiian Islands, and nonstop flights between Hawaii and 16 U.S. gateway cities as well as service connecting Honolulu and American Samoa, Australia, Cook Islands, Japan, New Zealand, South Korea and Tahiti.⁴

On December 3, 2023, AAG and HHI announced they had entered into an agreement under which Alaska would acquire and merge with Hawaiian. On September 18, 2024, following approval of the transaction by the U.S. Department of Transportation, the parties closed their Merger Agreement.

As noted above, AFA-CWA is the certified representative of the Flight Attendants craft or class at both Alaska and Hawaiian. The collective bargaining agreement (CBA) currently in effect between Alaska and AFA-CWA became amendable on December 17, 2022; and the current CBA between Hawaiian and AFA-CWA will become amendable on April 2, 2025. In connection with the merger transaction, AFA-CWA, AAG, Alaska, HHI, and Hawaiian negotiated a Merger Transition Process (MTP) agreement that establishes a process to reach a Joint Collective Bargaining Agreement (JCBA) governing the terms and conditions of employment of the flight attendants at the Combined Carrier. The MTP also provides a process for integration of the pre-merger Alaska and Hawaiian Flight Attendant seniority lists in a manner consistent with AFA Merger Policy.

According to the Combined Carrier, as of December 3, 2024, there were 9,124 Flight Attendants covered by AFA-CWA's application – 6,942 at Alaska and 2,182 at Hawaiian.

Common Corporate Ownership

As a result of the implementation of the Merger Agreement, Alaska and Hawaiian are now wholly-owned subsidiaries of AAG. Common shares of AAG

³ See oneworld.com/members/alaska-airlines; AAG 2023 Annual Report at news.alaskaair.com/investor-relations/financials/.

⁴ See <https://news.alaskaair.com/company/alaska-airlines-and-hawaiian-airlines-to-combine-expanding-benefits-and-choice-for-travelers-throughout-hawaii-and-the-west-coast/>

are traded on the New York Stock Exchange (NYSE) under the ticker symbol “ALK.” As of September 18, 2024, HHI shares were de-listed and ceased trading on the NASDAQ Global Select Market. AAG has a single board of directors currently comprised of the following members: Patricia Bedient, James Beer, Raymond Conner, Daniel Elwell, Kathleen Hogan, Adrienne Lofton, Ben Minicucci, Helvi Sandvik, J. Kenneth Thompson, and Eric Yeaman.⁵

Common Management

According to the Combined Carrier, it currently has in place common corporate management of the two pre-transaction carriers. In a September 18, 2024, press release, Alaska announced that AAG’s Chief Executive Officer (CEO) and President Ben Minicucci will lead the Combined Carrier, and he is currently doing so in that capacity. It was also announced that Joe Sprague, previously Alaska’s Regional President Hawaii/Pacific will serve as the CEO of Hawaiian until the FAA grants a single operating certificate for the Combined Carrier. Sprague is currently responsible for leading all aspects of Hawaiian’s operations. In addition, Daniel Chun, Alaska’s former Regional Vice President (RVP) Hawaii, is now RVP Hawaii of Hawaiian.

The following Alaska senior executives and senior management currently have or will soon assume responsibilities for the Combined Carrier: Constance Von Muehlen, Executive Vice President (EVP) & Chief Operating Officer (COO), oversees all labor relations functions for the Combined Carrier; Kyle Levine, General Counsel and Senior Vice President (SVP) Legal, has responsibility for legal functions; Andrea Schneider, SVP People, will assume responsibility for human resources functions at both carriers in the third quarter of 2025; Kirsten Amrine, Vice President (VP) of Revenue Management and Network Planning, has responsibility for the revenue management and network planning functions; Charu Jain, SVP of Merchandizing and Innovation, has responsibility for E-commerce and distribution functions; Vikram Baskaran, VP of Information Technology, has responsibility for all employee and operational technology, as well as cyber security; Emily Halverson, VP Finance Controller and Treasurer is also Treasurer of Hawaiian; Ryan St. John, VP of Finance, Planning, and Investor Relations, has responsibility for managing the budget, financial forecast, synergy capture, integration expense tracking, investor relations, and frontline staffing plans; and Allie Wittenberger, Assistant Corporate Secretary, is also Corporate Secretary of Hawaiian.

In connection with the merger, Alaska established an Integration Management Office (IMO), consisting of over 100 Alaska and Hawaiian employees. The executive sponsors of the IMO are Tiffany Dehaan (Alaska VP of Strategy) and Sprague. The IMO reports to a steering committee comprised of

⁵ See www.news.alaskaair.com.

Minicucci and a number of Alaska EVPs and SVPs representing various corporate and operational departments. To date, the IMO has developed a comprehensive integration plan and established over 50 functional integration teams representing the areas of Commercial, Guest Focus, Operations and Business Support.

Seattle, Washington, the location of Alaska's headquarters, will serve as the headquarters location for the Combined Carrier. The Hawaiian offices in Honolulu, Hawaii now function as a regional headquarters for the Combined Carrier.

Financial Integration

On September 18, 2024, AAG made its first filing with the Securities and Exchange Commission as parent of both Alaska and Hawaiian. That filing, a Form 8-K, included a description of the closing of the merger. AAG has reported its financial results on a consolidated basis, with separate reporting for each of its subsidiary carriers, including Alaska and Hawaiian. For instance, AAG reported third quarter 2024 consolidated results on a combined basis, including for Alaska and for 13 days of Hawaiian results (there were 13 days of AAG ownership of Hawaiian in that quarter). For the quarter, the Combined Carrier reported consolidated capacity (available seat miles), total unit revenue, unit cost excluding fuel, economic fuel cost per gallon, adjusted pretax income, adjusted earnings per share, and other metrics. In January 2025, AAG will report full-year 2024 results on a consolidated basis, with separate reporting for each subsidiary carrier.

At AAG's Investor Day on December 10, 2024, AAG presented an investor update, sharing information about the Combined Carrier's hubs, expanded network, improved schedule options to and from Hawaii, brand strength, transactional value, loyalty programs, market investments, and cargo business.

The Combined Carrier is currently working to finalize its 2025 budget, which will be fully combined and aligned across both Alaska and Hawaiian. Most back-office finance responsibilities have been combined and are the sole responsibility of a single Alaska senior executive (Shane Tackett, Alaska's EVP Finance and Chief Financial Officer), to ensure consistency between Alaska and Hawaiian from a financial oversight perspective.

A common investor relations, media and customer website for AAG and the Combined Carrier has been created and is available at www.localcareglobalreach.com. That website includes a link to Alaska's Investor Relations page where one can access various financial information, including the Combined Carrier's current stock price, 2024 Investor Day presentations, earnings releases, and financial results and filings.

Centralized Control of Labor Relations

Since the closing of the merger, Alaska's EVP and COO Von Muehlen assumed responsibility and direction for all labor relations at the Combined Carrier. The Combined Carrier's labor relations management team, all of whom report to Von Muehlen, is structured as follows: Elizabeth Ryan, Managing Director (MD), Labor Relations, has responsibility for the Pilot and Dispatcher workgroups at the Combined Carrier; Carmen Williams, MD, Labor Relations, has responsibility for the Flight Attendant workgroup at the Combined Carrier; Sonia Alvarado, MD, Labor Relations, has responsibility for the Mechanics and Related, Clerical, Office, Passenger Service, Ramp and Stores, and Fleet Service workgroups at the Combined Carrier; and Justin Doane, Hawaiian's VP Labor and People Relations, and his team continue to serve in their pre-merger roles throughout the merger transition and JCBA processes, partnering with Ryan, Williams, and Alvarado.

Labor Protection Provisions and Interim Agreements

According to the Combined Carrier, and as reflected below, Alaska and Hawaiian have transition agreements in place with most of the labor organizations representing their employees to determine, or to expedite the process for determining, common terms and conditions of employment for employees at the Combined Carrier.

Flight Attendants

As noted above, AFA-CWA represents flight attendants at both Alaska and Hawaiian. AFA-CWA, AAG, Alaska, HHI, and Hawaiian negotiated a MTP agreement that establishes a process to reach a JCBA governing the terms and conditions of employment of the flight attendants at the Combined Carrier. The MTP also provides various job protections for both flight attendant groups during the merger transition and operational integration, and a process for integration of the pre-merger Alaska and Hawaiian flight attendant seniority lists consistent with AFA Merger Policy.

Pilots

ALPA is the collective bargaining representative of the pre-merger Alaska pilots pursuant to certification in NMB Case No. R-3548.⁶ ALPA is also the recognized representative of the pre-merger Hawaiian pilots. The CBAs currently in effect between Alaska and ALPA and Hawaiian and ALPA have an amendable

⁶ On June 5, 2017, the Board extended ALPA's certification in R-3548 to cover the entire craft or class of Pilots at Alaska resulting from Alaska's merger with Virgin America. *Alaska Airlines/Virgin America*, 44 NMB 152 (2017) (NMB Case No. R-7492).

date of March 2, 2027. ALPA, AAG, Alaska, HHI, and Hawaiian have negotiated a Transition and Process Agreement (TPA), which establishes a process to reach a JCBA covering the pilots at the Combined Carrier. The TPA also provides a timeline and process for integration of the pre-merger Alaska and Hawaiian pilot seniority lists consistent with ALPA Merger Policy.

*Clerical, Office, Passenger Service, Ramp Service and Stores,
and Fleet Service Employees*

Alaska's Clerical, Office, and Passenger Service employees are represented by the International Association of Machinists and Aerospace Workers (IAM) pursuant to certification in Case No. R-4416. Hawaiian's Clerical, Office, and Passenger Service employees are included in a combined craft or class with Stores and Fleet Service employees, all of whom are represented by IAM pursuant to certification in NMB Case No. R-2726. Alaska's Fleet Service Employees group, which includes Ramp Service and Stores employees, are represented by the IAM pursuant to certification in NMB Case No. R-4416. IAM, AAG, Alaska, HHI, and Hawaiian negotiated an MTP agreement that establishes a process to reach JCBA's covering the above employees. The MTP also provides a process for integration of the pre-merger Alaska and Hawaiian employees' seniority lists in a manner consistent with IAM Merger Policy.

Dispatchers

Alaska's Dispatchers are represented by the Transport Workers Union of America (TWU) pursuant to certification in NMB Case No. R-6020. *Alaska Airlines*, 18 NMB 207 (1991). The CBA currently in effect between Alaska and the TWU has an amendable date of March 24, 2027. TWU is also the collective bargaining representative for Hawaiian's Flight Dispatchers pursuant to certification in NMB Case No. R-4695. *Hawaiian Airlines*, 6 NMB 166 (1977). The CBA currently in effect between Hawaiian and the TWU has an amendable date of April 21, 2027. Both CBAs contemplate negotiation of a JCBA, although the timing of that has yet to be determined.

Mechanics and Related Employees

Alaska's Mechanics and Related Employees are represented by the Aircraft Mechanics Fraternal Association (AMFA) pursuant to certification in NMB Case No. R-6572. *Alaska Airlines*, 25 NMB 318 (1998). The CBA currently in effect between Alaska and AMFA has an amendable date of October 17, 2028. The IAM is the collective bargaining representative of the pre-merger Hawaiian Mechanics and Related Employees pursuant to certification in NMB Case No. R-2401. The CBA currently in effect between Hawaiian and IAM has an amendable date of February 15, 2027.

Common Personnel Policies and Employee Communications

As mentioned above, Schneider will serve as the single executive responsible for Human Resources at the Combined Carrier beginning in the third quarter of 2025. Examples of the steps the Combined Carrier has taken or will soon take to implement common personnel policies and practices and common employee communications are set forth below. The Combined Carrier is in the process of harmonizing other personnel policies and procedures, and will implement additional common policies as they are developed. Details of policy changes are made available to employees on each carrier's intranet.

Personnel Policies. The Combined Carrier has been conducting a "side-by-side" comparison of personnel policies at both carriers, and has already changed some policies to create a single policy (by topic) across the Combined Carrier. For example, it has aligned in substance the rules of conduct and other policies governing employee behavior applicable to all of its employees. In addition, other common policies including an "open door" policy are now in place across both carriers. The Combined Carrier expects to have a single employee handbook in late 2025 or early 2026.

Performance Management. Alaska's performance management (annual review) process, which applies to management and other non-represented employees, is currently under review by Alaska. The Combined Carrier expects that a new performance management process will be incorporated into the 2025 performance management cycle applicable to covered employees at both carriers.

Personnel and Payroll Systems. By January 1, 2026, the Combined Carrier expects to have completed integration of payroll and personnel systems and related technologies. It is currently undertaking a request for proposals (RFP) process with vendors specific to the projects' requirements.

Employee Benefits. All back-office employees of the Combined Carrier are expected to participate in a single enrollment period for 2026 health and welfare benefits coverage. The Combined Carrier is currently in the process of evaluating the different state law requirements with respect to health and welfare benefits (e.g., in the States of Hawaii and Washington), and expects to undertake an RFP process with vendors/providers some time in 2025.

Employee Travel Policies. Qualified Alaska employees and their travel-eligible dependents can travel on Hawaiian through a zero-fare interline agreement, and they travel at a higher priority than any other airline's employees except for Hawaiian. The same is true for qualified Hawaiian employees and their travel-eligible dependents traveling on Alaska. The Combined Carrier anticipates it will have a fully integrated travel program by the time it integrates passenger service systems.

Recruiting. Long-term employment offers at Hawaiian are already going through the Alaska job classification and compensation framework. The Combined Carrier plans to shortly implement a joint careers page for job candidates. The Combined Carrier's employees are currently able to apply as internal candidates for positions at both carriers. All of the Combined Carrier's recruiting functions will be combined in the fourth quarter of 2025.

Employee Identification Numbers (EINs). The Combined Carrier will have an integrated EIN system in the third quarter of 2025. At that time, employees of both Alaska and Hawaiian will receive new Alaska EINs. Hawaiian employees will keep their historical Hawaiian EIN until January 1, 2026, at which time that number will be discontinued.

People Resource Line. The Combined Carrier has implemented a people resource hotline for Hawaiian employees to contact with questions about their employment at the Combined Carrier. The line's scope will be expanded to support broader human resources-related questions.

Intranet. Alaska's intranet system — www.teamaag.com (Team Alaska Air Group) — will be the intranet resource for the Combined Carrier's employees. Until then, identical updates and news are posted on both carriers' legacy systems and administrators of both systems are coordinating with regard to topics of common interest and posting the same on both carriers' systems.

Employee Calendars and Email. Hawaiian employees have been added to Alaska's electronic directory. They also have calendar visibility into Alaska employees' calendars. Further, they have unified communications (email, instant messaging, conferencing, and collaboration) with Alaska employees. It is anticipated that full calendar and email integration on a single platform will begin for the Combined Carrier in the third quarter of 2025.

Leadership Summits, Employee Meetings, Surveys, and Focus Groups. In October 2024, the Combined Carrier conducted a leadership summit with senior leaders from both carriers. Information from the summit has been and will continue to be circulated to supervisors across the Combined Carrier. The Combined Carrier has plans to hold an all-employee meeting in January 2025 to share the vision for its future business and culture. In addition, the Combined Carrier has conducted comprehensive employee surveys and focus groups and established two employee culture guide groups—one from Hawaiian and one from Alaska—to guide its future culture. On October 15, 2024, the Combined Carrier commemorated the combination of Alaska and Hawaiian with a special ceremony, marked by the introduction of a symbol designed by a Native Hawaiian artist. The shared cultural framework will be finalized and communicated to the Combined Carrier's employees in early 2025, with plans to bring all of its

employees together later in the year for training and immersion into the Combined Carrier's new, shared values.

FAA Operating Certificate and Integrated Operations

According to the Combined Carrier, complete operational integration of all functions at the Combined Carrier, including flight operations, will occur after the FAA issues a single operating certificate to the Combined Carrier, which it expects by October 2025. Until that time, and to the maximum extent feasible, the Combined Carrier plans to take steps to integrate operational functions. Below are some of the changes it has made or intends to make to integrate Alaska's and Hawaiian's operations:

FAA Operating Certificate/Transition Plan. The Carriers are working toward obtaining their single operating certificate from the FAA. In furtherance of that goal, the Combined Carrier submitted its Transition Plan to the FAA Joint Transition Team (JTT), and the JTT accepted that plan in early November 2024. It also submitted to the JTT Revision Cycle 1 to combine operating processes and manuals, which the JTT is currently reviewing. Alaska's Flight Operations Manual and Boeing 737 procedures and Hawaiian's Airbus 330, 330F, 321, and Boeing 787 and 717 procedures will be used for the Combined Carrier. The Combined Carrier is actively working on Revision Cycle 2, which it plans to submit to the JTT in early February 2025.

Codeshare Agreement. A codeshare agreement at the Combined Carrier went into effect on September 18, 2024. The agreement permits each carrier to market and place its airline designator code on flights operated by the other carrier. Codeshare flights became available for sale on September 25, 2024. The Combined Carrier intends for codesharing to continue until it obtains a single operating certificate from the FAA.

Network and Schedule Planning. The Combined Carrier has begun changing the individual carrier's networks and combining schedules to better meet the Combined Carrier's and passengers' and cargo customers' needs. For example, on December 10, 2024, the Combined Carrier released its combined spring/summer 2025 schedule. The Combined Carrier also announced additional spring/summer departures from key combined hub cities and the deployment of Hawaiian wide-body aircraft to operate directly from Seattle to Asia (instead of only Hawaiian wide-body aircraft from Honolulu to Asia) and from Seattle to Anchorage (instead of only Alaska narrow-body aircraft from Seattle to Anchorage). The Combined Carrier further announced the spring/summer adjustment of flying to Alaska-only and Hawaiian-only routes in order to begin executing on its combined network strategy, as well as changed departure times to better serve the combined network. On the same day, the Combined Carrier announced detailed combined cargo operations plans.

Emergency Response Procedure. The Combined Carrier already has built links between parts of their emergency response programs. It is anticipated the Combined Carrier will have the same emergency response program by October 2025.

Frequent Flyer Programs

With the closing of the merger, the Combined Carrier has taken or has plans to soon take steps with respect to the Alaska and Hawaiian loyalty programs. For example, as of September 26, 2024, the Combined Carrier's customers were able to transfer miles between Alaska Mileage Plan and HawaiianMiles at a 1:1 ratio at no charge; at the end of 2024, frequent flyers at the Combined Carrier received a status match or status upgrade in both loyalty programs based on their combined year-to-date activity in both programs; at the end of 2024, Alaska frequent flyer miles became redeemable for Hawaiian flights using Alaska's reservations department or through alaskaair.com (Hawaiian miles were already transferrable to Alaska's plan and redeemable for flights on Alaska or its global partners); and, as of January 2025, frequent flyers are able to earn miles when traveling on the other carrier's flights.

The Combined Carrier expects to fully combine the Alaska and Hawaiian frequent flyer programs in 2025. Separately, the Combined Carrier plans to launch by January 2025 a new State of Hawaii resident program ("Huaka'i by Hawaiian") that will include unique discounts and benefits on the Combined Carrier exclusively for Hawaii residents.

Communications regarding the Carriers' frequent flyer programs have been made available publicly at alaskaair.com, and the Combined Carrier plans to communicate more details on the combined frequent flyer program around mid-2025.

Holding out to the Public

Following the announcement of the merger in December 2023, the Combined Carrier issued a news release titled "Alaska Airlines and Hawaiian Airlines to Combine, Expanding Benefits and Choice for Travelers Throughout Hawai'i and the West Coast" and is using the website www.LocalCareGlobalReach.com to provide information about the integration process, including fact sheets about the merger, FAQs for investors, customers, employees, and communities, and links to each carrier's websites – for investor contacts, media contacts, and customer service contacts.

On September 18, 2024, after the merger closed, the Combined Carrier issued another news release titled "Alaska Airlines completes acquisition of Hawaiian Airlines, expanding benefits and choice for travelers" that outlines

expanded benefits for customers. Also, on that date Alaska's President and CEO Minicucci sent an email and video to all Alaska and Hawaiian frequent flyer members outlining what they could expect with the merger.

In addition, on the hawaiianairlines.com website, visitors will see information about the merger. Specifically, a "Alaska x Hawaiian" area of the site ("Two beloved brands. Taking you further.") states, "We're proud to announce Hawaiian Airlines has joined Alaska Airlines, with exciting new things coming soon." A "Learn more" link directs visitors to further information about the merger, and an additional link takes visitors to the Combined Carrier's website at news.alaskaair.com which provides additional detail and information regarding the merger.

The Combined Carrier has also taken or has plans to take the following steps with respect to how it holds itself out to the public:

Airports/Signage. Alaska has begun consolidation at airports where Alaska and Hawaiian are co-located. Specifically, at the San Francisco International Airport, Hawaiian's ticket counters, kiosk locations, gates, and employee spaces are now consolidated with Alaska's. Additionally, the Combined Carrier has posted directional signage at airports served by both carriers. The Combined Carrier will update this signage to reflect the integration progress as the Combined Carrier announces new policies.

Passenger Service System. The Combined Carrier projects it will implement a single passenger service system in the first half of 2026. This will include the integration of reservations centers.

Boarding Announcements and Processes. The Combined Carrier's boarding announcements have been aligned to accommodate both carriers' priority passengers. Additionally, the Combined Carrier has made changes to Hawaiian's boarding process to more closely align with Alaska's.

Boarding Passes. The Combined Carrier's customers who purchase Hawaiian-operated domestic flights through the Alaska website may access and print their boarding passes from the Alaska website. Similarly, the Combined Carrier's customers who purchase Alaska-operated flights through the Hawaiian website may access and print their boarding passes from the Hawaiian website.

Inflight Services. The Combined Carrier's inflight services, such as inflight announcements, are currently being made uniform between the carriers.

Customer and Employee Support. The Combined Carrier has made multiple rounds of "Day 1" training, including bulletins, group sessions, and FAQs,

available to customer-facing employees at the Combined Carrier regarding the changes taking place during the integration process.

Warm Call Transfers/Greetings. The Combined Carrier implemented a process following merger close allowing customers to be transferred between both carriers' call centers.

Brand Elements and Livery

According to the Combined Carrier, although operating as a single, integrated carrier, it will maintain Alaska and Hawaiian as two distinct brands, to be reflected on aircraft liveries, at airports, and elsewhere. In a September 18, 2024 communication announcing the completion of its acquisition of Hawaiian, for example, Alaska stated that, "In a first for a U.S. airline, we will maintain both beloved brands." In the same piece, in a communication titled, "Future of the Hawaiian Airlines Brand," it was stated that Hawaiian's "iconic brand will continue to welcome and delight guests – on aircraft, in airports and onboard, just like it is today."⁷

Standardized Uniforms

The Combined Carrier has issued to all of its employees a pin commemorating the merger of Alaska and Hawaiian, and is in the process of designing a new uniform that will preserve the distinctiveness of each brand's uniform while also creating a common uniform base that will enable employees to work across airline brands during any given period. To that end, the Combined Carrier is conducting an extensive "listening tour" to ensure it understands employees' uniform needs and incorporates thoughtful improvements to their current uniforms.

DISCUSSION

I.

The Board's Authority

45 U.S.C. § 152, Ninth, authorizes the Board to investigate disputes arising among a carrier's employees over representation and to certify the duly authorized representative of such employees. The Board has exclusive jurisdiction over representation questions under the RLA. *General Comm. of Adjustment v. Missouri-Kansas-Texas R.R.*, 320 U.S. 323 (1943); *Switchmen's Union of N. Am. v. NMB*, 320 U.S. 297 (1943). In *ALPA v. Texas Int'l Airlines*, 656

⁷ See Combined Carrier's communications, filings, and presentations at news.alaskaair.com/investor-relations; <https://news.alaskaair.com/company/alaska-airlines-and-hawaiian-airlines-to-combine-expanding-benefits-and-choice-for-travelers-throughout-hawaii-and-the-west-coast/>

F.2d 16, 22 (2d Cir. 1981), the court stated, “the NMB is empowered to . . . decide representation disputes arising out of corporate restructurings.”

II.

Single Transportation System

Manual Section 19.4 provides that: “Any organization or individual may file an application, supported by evidence of representation or a showing of interest . . . seeking a determination whether a single system of transportation exists.”

In *Trans World Airlines/Ozark Airlines*, the Board cited the following indicia of a single transportation system:

[W]hether a combined schedule is published; how the carrier advertises its services; whether reservation systems are combined; whether tickets are issued on one carrier’s stock; if signs, logos and other publicly visible indicia have been changed to indicate only one carrier’s existence; whether personnel with public contact were held out as employees of one carrier; and whether the process of repainting planes and other equipment, to eliminate indications of separate existence, has been progressed.

Other factors investigated by the Board seek to determine if the carriers have combined their operations from a managerial and labor relations perspective. Here, the Board investigates whether labor relations and personnel functions are handled by one carrier; whether there are a common management, common corporate officers and interlocking Boards of Directors; whether there is a combined workforce; and whether separate identities are maintained for corporate and other purposes.

14 NMB 218, 236 (1987).

The Board finds a single transportation system only when there is substantial integration of operations, financial control, and labor and personnel functions. *Alaska Airlines/Virgin America*, 44 NMB 25 (2017); *Southwest Airlines/AirTran Airways*, 43 NMB 120 (2016); *Delta Air Lines/Northwest Airlines*, 36 NMB 36 (2009); *Burlington N. Santa Fe Ry. Co.*, 32 NMB 163 (2005); *Huron & Eastern Ry.*, 31 NMB 450 (2004); *Portland & Western R. R.*, 31 NMB 71 (2003). Further, the Board has noted that a substantial degree of overlapping ownership, senior management, and boards of directors is critical to finding a single transportation system. *Precision Valley Aviation, d/b/a Precision Airlines & Valley Flying Serv. d/b/a Northeast Express Reg’l Airlines*, 20 NMB 619 (1993). The Board’s criteria for substantial integration of operations do not require total integration of operations. *American Airlines/US Airways*, 41 NMB

174 (2014); *Atlantic Southeast Airlines/ExpressJet Airlines*, 38 NMB 224 (2011); *US Airways/America West Airlines*, 33 NMB 49 (2006).

In the instant case, the integration of the Carriers is substantial. The corporate merger became effective on September 18, 2024. The Carriers are now commonly owned by AAG, which has a single Board of Directors, and Seattle, Washington will serve as the headquarters location for the Combined Carrier. The Carriers have common management at the highest levels, and single officers are or will soon be responsible for the Carriers' labor relations and human resources functions. Most finance responsibilities at the Combined Carrier are the sole responsibility of a single senior executive, and the finances of the Carriers are reported on a consolidated basis. The Carriers are pursuing a single operating certificate from the FAA, a process the Carriers expect to conclude in October of 2025. As that process continues, the Carriers are continuing to integrate routes and schedules, network strategy, and customer functions and operations, including the Carriers' frequent flyer programs.

Further, since the merger the Combined Carrier has negotiated a number of merger transition agreements with representatives of its employees, including AFA-CWA, which establish processes for reaching JCBA's governing terms and conditions of employment for employees of the Combined Carrier; has implemented a number of common personnel policies applicable to employees of both Carriers; has put in place numerous common employee communication and information vehicles and resources; has regularly communicated to the public and their customers that they are combining to form a single airline (while retaining the separate Alaska and Hawaiian brands); and has taken a number of significant steps to hold itself out to the public as a single transportation system.

Based upon the application of the principles to the facts established by the investigation, the Board finds that Alaska and Hawaiian are a single transportation system for representation purposes in the Flight Attendant craft or class.

CONCLUSION

The Board finds that Alaska and Hawaiian are operating as a single transportation system for representation purposes under the RLA. Accordingly, AFA-CWA's application in File No. CR-7258 is converted to NMB Case No. R-7651. Pursuant to Manual Section 19.6, the investigation will proceed to address the representation of the craft or class of Flight Attendants. Any Intervenor has 30 days from the date of this determination to file an application supported by a showing of interest of at least 50 percent of the single transportation system in accordance with Manual Sections 19.601 and 19.603. The participants are

reminded that under Manual Section 19.7, existing certifications remain in effect until the Board issues a new certification or dismissal.

By direction of the NATIONAL MEDIATION BOARD.

A handwritten signature in black ink, appearing to read "Maria-Kate Dowling". The signature is fluid and cursive, with the first name "Maria" and last name "Dowling" clearly legible.

Maria-Kate Dowling
General Counsel