



NATIONAL MEDIATION BOARD

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

In the Matter of the Application of
INTERNATIONAL ASSOCIATION OF
MACHINISTS AND AEROSPACE
WORKERS

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

involving employees of

ALASKA AIRLINES, INC./
HAWAIIAN
AIRLINES, INC.

52 NMB No. 42

CASE NO. R-7665
(File No. CR-7264)

FINDINGS UPON
INVESTIGATION – SINGLE
CARRIER DETERMINATION

June 6, 2025

This determination addresses the application filed by the International Association of Machinists and Aerospace Workers (IAM or Organization). The IAM asks the National Mediation Board (NMB or Board) to 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 Clerical, Office, Stores, Fleet, and Passenger Service Employees.

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 April, 17, 2025, the IAM filed an application alleging a representation dispute involving the craft or class of Clerical, Office, Stores, Fleet, and Passenger Service Employees at the Combined Carrier.

The Clerical, Office, Fleet, and Passenger Service Employees craft or class is represented by the IAM at Alaska under the Board's certification in NMB Case No. R-4416.¹ The IAM also represents the Clerical, Office, Stores, Fleet, and Passenger Service Employees craft or class at Hawaiian under the Board's certification in NMB Case No. R-2726.²

The Board assigned Eileen M. Hennessey to investigate and requested that the Carriers provide information regarding their operations. On May 1, 2025, the Carriers provided the information requested by the Board and an initial position statement. The IAM filed a position statement with its application and filed an additional statement on May 8, 2025 in response to the Carriers' May 1, 2025 submission.

ISSUE

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

CONTENTIONS

The IAM and the Carriers state that the NMB's requirements for finding of a single transportation system for the craft or class of Clerical, Office, Stores, Fleet, and Passenger Service Employees have been met. The Organization notes that the NMB has already found the Carriers to be operating as a single transportation system for the Flight Attendants craft or class in *Alaska*

¹ The IAM was certified to represent Clerical, Office, Fleet, and Passenger Service Employees on Alaska in NMB Case No. R-4416 on March 8, 1974. On May 8, 2017, the Board certified the IAM as the representative of the entire craft or class of Clerical, Office, Fleet and Passenger Service Employees at Alaska resulting from Alaska's merger with Virgin America. *Alaska Airlines/Virgin America*, 44 NMB 97 (2017) (NMB Case No. R-7484).

² On September 15, 1953, the IAM was certified to represent the Clerical, Office, Stores, Fleet, and Passenger Service Employees at Hawaiian. NMB Case No. R-2726.

Airlines/Hawaiian Airlines, 52 NMB 112 (2025), and for the Pilots craft or class in *Alaska Airlines/Hawaiian Airlines*, 52 NMB 143 (2025).

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.

The IAM is a labor organization and/or representative as defined in 45 U.S.C. § 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

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 Department of Transportation, the parties closed their Merger Agreement.

The employees in Alaska's Clerical, Office, Fleet, and Passenger Service craft or class are subject to two collective bargaining agreements (CBAs) currently in effect between Alaska and the IAM. One CBA covers Clerical, Office and Passenger Service employees and the other covers Ramp and Stores employees. Both become amendable on September 27, 2026. Hawaiian's Clerical, Office, Stores, Fleet Service and Passenger Service employees are covered by one CBA that is amendable on February 15, 2027.

According to the Combined Carrier, as of April 28, 2025, the number of employees covered by the CBAs at Alaska is 5,851. The total number of employees covered by the CBA at Hawaiian is 1,710.

Alaska, Hawaiian, and the IAM entered into Merger Transition Protocol Agreement ("MTP"), and agreed to begin negotiations for joint CBAs (JCBAs) no later than April 28, 2025. The Combined Carrier and the IAM have scheduled six, three-day bargaining sessions for purpose of negotiating the JCBAs. These sessions are scheduled to take place during the second half of 2025. Alaska, Hawaiian, and the IAM also agreed to forgo Section 6 negotiations for the three existing CBAs if the parties remain in JCBA negotiations after those CBAs become amendable. The MTP also provides a process for integration of the pre-merger Alaska and Hawaiian employees' seniority lists that is consistent with the IAM's Merger Policy.

Common Corporate Ownership

As a result of the implementation of the Merger Agreement, Alaska and Hawaiian are wholly owned subsidiaries of AAG, which has a single Board of Directors. Common shares of AAG are traded on the New York Stock Exchange under the ticker symbol "ALK." HHI shares are no longer listed on the NASDAQ Global Select Market. The Combined Carrier has a common investor relations, media and customer website – www.localcareglobalreach.com.

Common Management

The Combined Carrier currently has in place common corporate management of the two pre-transaction carriers. AAG's Chief Executive Officer (CEO) and President Ben Minicucci leads the Combined Carrier, and Joe Sprague, previously Alaska's Regional President Hawaii Pacific, serves as President and CEO of Hawaiian. In addition, Daniel Chun, Alaska's former Regional Vice President (RVP) Hawaii, is RVP Hawaii of Hawaiian.

The following Alaska executives are responsible for the Combined Carrier's labor relations and human resources functions: Constance Von Muehlen, Executive Vice President (EVP) & Chief Operating Officer (COO), oversees all labor relations functions for the Combined Carrier; and Andrea Schneider, Senior Vice President (SVP) People, is responsible for human resources functions

at both carriers. Other Alaska SVPs and Vice Presidents (VPs) are responsible for the Combined Carrier's legal functions; revenue management and network planning functions; E-commerce and distribution functions; and employee and operational technology and cyber security. In addition, Alaska's VP Finance Controller and Treasurer is also Treasurer of Hawaiian; Alaska's 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 for the Combined Carrier; and Alaska's Assistant Corporate Secretary is also Corporate Secretary of Hawaiian.

In connection with the merger, Alaska established an Integration Management Office, consisting of over 100 Alaska and Hawaiian employees. The executive sponsors of the office are Tiffany Dehaan (Alaska VP of Strategy) and Sprague and it reports to a steering committee comprised of Minicucci and a number of Alaska EVPs and SVPs representing various corporate and operational departments. To date, the office 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, serves 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). In January 2025, AAG reported 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 has finalized its 2025 budget, which is fully combined and aligned across both Alaska and Hawaiian. First quarter 2025 and

Full Year 2025 financial guidance to investors was provided on a combined basis. Most back-office finance responsibilities have been combined and are the sole responsibility of a single Alaska senior executive 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 is available at www.localcareglobalreach.com.

Centralized Control of Labor Relations

As noted above, Alaska's EVP and COO Von Muehlen is responsible 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, Labor Relations, has responsibility for the Pilot and Dispatcher workgroups; Carmen Williams, Managing Director, Labor Relations, has responsibility for the Flight Attendant workgroup; Sonia Alvarado, Managing Director, Labor Relations, has responsibility for the Mechanics and Related, the Clerical, Office, Passenger Service, Ramp and Stores, and the Fleet Service workgroups; 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.

Labor Protection Provisions and Interim Agreements for Other Employees

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

On March 6, 2025, the Board issued a decision finding a single transportation system for the craft or class of Flight Attendants at the Combined Carrier. *See Alaska Airlines/Hawaiian Airlines*, 52 NMB 112 (2025). At that time, Association of Flight Attendants-CWA (AFA-CWA) was the collective bargaining representative of the pre-merger Alaska flight attendants under a certification in NMB Case No. R-3477. AFA-CWA was also the collective bargaining representative of the pre-merger Hawaiian flight attendants under a certification in NMB Case No. R-3515. On April 11, 2025, the Board certified AFA-CWA as the representative of the Flight Attendants craft or class at the Combined Carrier. *See Alaska Airlines/Hawaiian Airlines*, 52 NMB 133 (2025). AFA-CWA, AAG, Alaska, HHI, and Hawaiian negotiated a Merger Transition Process (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 a process for integration of the pre-merger Alaska and Hawaiian flight attendant seniority lists consistent with AFA Merger Policy.

Pilots

The Air Line Pilots Association (ALPA) represented Pilots at both pre-merger Alaska and pre-merger Hawaiian. On May 2, 2025, the Board issued a decision finding a single transportation system for the craft or class of Pilots at the Combined Carrier. *See Alaska Airlines/Hawaiian Airlines*, 52 NMB 143 (2025). On June 4, 2025, the Board certified ALPA as the representative of the Pilots craft or class at the Combined Carrier. *See Alaska Airlines/Hawaiian Airlines*, 52 NMB 160 (2025). ALPA, AAG, Alaska, HHI, and Hawaiian have negotiated a Transition and Process Agreement (TPA), which establishes a process to reach a JCBA governing the terms and conditions of employment of 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 in a manner consistent with the ALPA 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. *See 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. *See 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.

Mechanics and Related Employees

Alaska's Mechanics and Related Employees are represented by the Aircraft Mechanics Fraternal Association (AMFA) *Alaska Airlines*, 25 NMB 318 (1998) (R-6572). 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. On May 14, 2025, AMFA filed an application requesting the Board investigate whether the Combined Carrier is operating as a single transportation system for the craft or class of Mechanics and Related Employees (NMB File No. CR-7265).

Common Personnel Policies and Employee Communications

As mentioned above, Schneider currently serves as the single executive responsible for Human Resources at the Combined Carrier. 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.

Personnel Policies. The Combined Carrier has been conducting a “side-by-side” comparison of personnel policies at both carriers, and has changed some policies to create a single policy (by topic) across the Combined Carrier. Currently, changes to personnel policies are available to employees on each Carrier’s intranet. 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. The Combined Carrier expects that a new performance management process will be incorporated into the 2025 performance management cycle applicable to both carriers.

Performance-Based Pay. Beginning in 2025, all Alaska and Hawaiian employees participate in the same performance-based pay plan, which is an incentive and company performance plan. Under these plans, employees at Alaska and Hawaiian are working together toward the same set of company performance metrics.

Personnel and Payroll Systems. By January 1, 2026, the Combined Carrier expects to have completed integration of payroll and personnel systems and related technologies.

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.

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 implemented a joint landing page for recruiting the week of March 17,

2025. The Combined Carrier's employees are 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.

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. The Combined Carrier intends to support all human resource-related questions through the People Resource Line by the fourth quarter of 2025.

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. Hawaiian employees already have full access to certain portions of Team Alaska Air Group.

Employee Calendars and Email. Hawaiian employees have been added to Alaska's electronic directory and have calendar visibility into Alaska employee's calendars. 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 was used during an all-employee Combined Carrier meeting held in January 2025 to share the Combined Carrier's 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 merger with a 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 during the summer of 2025, with plans to bring all employees together in 2026 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 Federal Aviation Administration (FAA) issues a single operating certificate to the Combined Carrier, which it expects by October 2025. 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. 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 has approved. The Combined Carrier submitted Revision Cycle 2, 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.

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 and 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. The Combined Carrier also announced detailed combined cargo operations plans. Flying for "Phase One" of the combined spring network schedule began on March 19, 2025.

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; as of December 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; as of December 2024, Alaska frequent flyer miles became redeemable for Hawaiian flights using Alaska's reservations department or through alaskaair.com; 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, in November 2024, the Combined Carrier launched a new State of Hawaii resident program ("Huaka'i by Hawaiian") that includes unique discounts and benefits on the Combined Carrier exclusively for Hawaii residents.

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.

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, San Diego, Phoenix, and Los Angeles International Airports, Hawaiian's ticket counters, kiosk locations, gates, and employee spaces are now consolidated with Alaska's. Portland (Oregon), San Jose, Sacramento, Salt Lake City, Las Vegas, Oakland,

Maui, Kona, and Lihue airports are projected to be consolidated in the third quarter of 2025; John F. Kennedy International Airport is projected to be consolidated in the fourth quarter of 2025. The Combined Carrier has posted directional signage at airports served by both carriers that are not yet consolidated.

Passenger Service System/Ticketing. The Combined Carrier projects it will implement a single Passenger Service System (PSS) in the first half of 2026. This will include the integration of reservations centers. Sabre was selected as the PSS vendor for the Combined Carrier. Tickets are being sold to passengers across both carriers and many partners through both the Hawaiian and Alaska websites.

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. In addition, a large "Change Management" initiative ensures customers and employees are fully supported during the integration.

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

Standardized Uniforms

The Combined Carrier has issued its employees a commemorative pin. The Combined Carrier is designing a new uniform that will preserve the distinctiveness of each brand's uniform while also creating a common base that will enable employees to work across airline brands during any given period. The Combined Carrier is conducting an extensive listening tour to ensure the

Combined Carrier understands employees' 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. *See 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 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. *See, e.g., Alaska Airlines/Virgin America*, 44 NMB 25 (2017); *Delta Air Lines/Northwest Airlines*, 36 NMB 36 (2009); *Burlington N. Santa Fe Ry.*, 32 NMB 163 (2005). 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. *See Precision Valley Aviation/Valley Flying Serv.*, 20 NMB 619 (1993). The Board's criteria for substantial integration of operations do not require total integration of operations. *See, e.g., 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).

The Board has already found that Alaska and Hawaiian are a single transportation system with regard to the Flight Attendants and Pilots crafts or classes in *Alaska Airlines/Hawaiian Airlines*, 52 NMB 112 (2025) and *Alaska Airlines/Hawaiian Airlines*, 52 NMB 143 (2025), respectively, and since those decisions the Combined Carrier has taken additional steps to further integrate its operations. There is no reason not to find a single transportation system for the employees at issue in this case.

As the Board found previously, the integration of the Carriers is substantial. The corporate merger became effective on September 18, 2024. The Carriers are commonly owned by AAG, and Seattle, Washington serves as the headquarters location for the Combined Carrier. The Carriers have common management at the highest levels, and single officers are 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 the IAM, 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 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; and has taken 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 for the Clerical, Office, Stores, Fleet, and Passenger Service Employees 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, the IAM's application in File No. CR-7264 is converted to NMB Case No. R-7665. Pursuant to Manual Section 19.6, the investigation will proceed to address the representation of the craft or class of Clerical, Office, Stores, Fleet, and Passenger Service Employees. 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.



Maria-Kate Dowling
General Counsel