

Grievance Resolutions

(Included with Contract 2019 TA)

General

- ALPA and the Company agree to the resolution of the below-described grievances and disputes *contingent on the ratification of **Contract 2019 TA***.
- If the TA fails membership ratification, then all resolutions (settlements and withdrawals) are null and void, and ALPA is free to pursue these grievances/disputes.
- The withdrawals of any grievances/disputes described below are *without prejudice to ALPA's interpretation of the PWA* in the underlying disputes and may not be used as evidence against ALPA in any future proceeding.

COVID/NFLY Grievances

- *Grievance 21-15: PDS & Sick*
 - ALPA withdraws this grievance and may not re-file it in the future.
 - This resolution is limited to the COVID-19 vaccine booster **ONLY**.
 - It may not be used as evidence against ALPA in any similar (but non-COVID-related) dispute in the future.
- *Grievance 21-19: Rotations while under Quarantine (also resolving individual grievances 20-22 and 20-23)*
 - The Company will pay a lump sum not to exceed \$262,500 as full settlement
 - \$262,500 is based on \$250/day for 7 days for an estimated 150 pilots.
 - Pilots that have already contacted ALPA are eligible
 - ALPA will notify the Company of the affected pilots entitled to receive a share
 - Normal deductions will be applied (taxes, dues, etc.)
 - Pilots will be paid \$250/day (excluding any days they had an underlying trip for which the pilot was pay protected) for the length of their quarantine.
 - A cap on the number of days paid may become necessary to remain within \$262,500.
 - This settlement will be non-precedential and non-referrable.
- *Grievance 21-24: GRU/LHR*
 - The Company will pay 12 of the 23 instances as a settlement on a non-precedential, non-referrable basis
 - The Company will not pay for the other 11 instances in which pilots previously pay protected for Brazil trips that were removed
 - Company agrees this does not constitute a pilot or ALPA waiving PWA pay protection.
 - It is non-precedential and non-referrable in any future disputes.
- *Grievance 22-07: Removal from NFLY*
 - ALPA will provide a list of affected pilots who submitted issue forms/DARTS to Contract Administration believing they were improperly removed from NFLY and placed on sick ("disputed sick credit hours")
 - Disputed sick credit hours confirmed as the result of being removed from NFLY and placed on sick, such hours will not count towards the pilot's sick leave verification lookback under **Section 14 F. 2. & F. 6**.
 - Example: if an affected pilot has disputed sick credit hours totaling 15:45, those sick hours will not count towards the 120-hour trigger in **PWA Section 14 F. 2**.

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Scope Grievance

- *Grievance 21-02: 76-seat aircraft violation*
 - ALPA will withdraw the grievance and may not re-file a grievance over such violation for the time period from March 1, 2020, to March 1, 2023

Scope Disputes

- ALPA agrees not to pursue the following disputes for the respective measurement periods:
 - “Force majeure” disputes for AF, KL, VS, KE (***PWA Sections 1 E. 2., 1 E. 3., and 1 E. 8.***) for the period from March 1, 2020, to March 1, 2023.
 - “Force majeure” dispute for Pacific Block hour floor (***PWA Section 1 E. 2. e.***) for the period from March 1, 2020 to March 1, 2023
 - Dispute regarding Company’s alleged noncompliance with ***PWA Section 1 E. 7.*** in all theaters and all JVs for the period from March 1, 2020, to March 1, 2023.
- ALPA agrees not to pursue the following “pre-grievance” disputes:
 - Dispute regarding ***PWA Section 1 E. 10.*** not being applicable regarding ***Section 1 P. 4. Notes one and two***
 - Dispute regarding ***PWA Section 1 E. 10.*** not being applicable to the VS JV amendment.
 - Dispute regarding the LATAM JV and ***PWA Section 1 E. 7.***
 - ALPA agrees that this language will not apply to Paraguay until such time as there is nonstop service between Paraguay and CONUS on a JV partner.
- ***If similar disputes occur in the future, ALPA is not prevented from pursuing a grievance at that time.***
- ***Delta cannot use ALPA’s decision not to pursue the above Scope disputes as evidence against ALPA in any future proceeding.***