



Airlines for America®

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April 9, 2026

Co-Chair Jon Koznick
Transportation Finance and Policy Committee
Minnesota House of Representatives
2nd Floor Centennial Office Building
St. Paul, MN 55155

Co-Chair Brad Tabke
Transportation Finance and Policy Committee
Minnesota House of Representatives
5th Floor Centennial Office Building
St. Paul, MN 55155

Co-Vice Chair Lucy Rehm
Transportation Finance and Policy Committee
Minnesota House of Representatives
5th Floor Centennial Office Building
St. Paul, MN 55155

Co-Vice Chair Andrew Myers
Transportation Finance and Policy Committee
Minnesota House of Representatives
2nd Floor Centennial Office Building
St. Paul, MN 55155

Re: Minnesota Bill No. 4180 (H.F. No. 4180)

Dear Co-Chairs Koznick and Tabke and Co-Vice Chairs Rehm and Myers:

Airlines for America (A4A) is the trade association for the leading U.S. airlines.¹ We advocate on behalf of our members to shape crucial policies and measures that promote safety, security and a healthy U.S. airline industry. We write to respectfully remind the State of Minnesota that the Federal government exclusively governs the services of air carriers and that the regulation of air carrier services in House bill 4180 (HF4180) is Federally preempted.

As currently proposed, the HF4180 would regulate the airlines' services – whether directly, or indirectly through our service providers – including but not limited to: flight crew obligations, retention of forms, the services provided to an aircraft necessary for the provision of air transportation (including the refueling of aircraft) and conditions on the provision of air transportation services at Minnesota airports.

When Congress deregulated the airline industry in 1978, it included a provision to “ensure that the States would not undo federal deregulation with regulation of their own.”² Specifically, the ADA provides that the U.S. government exclusively governs air carriers' prices, routes or services—“a State, political subdivision of a State, or a political authority of at least 2 States **may not** enact or enforce a law, regulation or other provision having the force and effect of law **related to** a price, route or **service** of an air carrier that may provide air transportation”³ In sum, state regulation relating to airline services, such as HF4180, is unenforceable against air carriers. Accordingly, we request that HF4180 be withdrawn.

¹ See A4A's members are Alaska Air Group, Inc.; American Airlines Group, Inc.; Atlas Air Worldwide Holdings, Inc.; Delta Air Lines, Inc.; FedEx Corp.; JetBlue Airways Corp.; Southwest Airlines Co.; United Airlines Holdings, Inc.; and United Parcel Service Co. Air Canada is an associate member.

² *Morales v. Trans World Airlines, Inc.*, 504 U.S. 374, 378 – 379 (1992).

³ 49 U.S.C. § 41713 (emphasis added). In alignment, the U.S. Supreme Court held that the ADA has a “broad preemptive purpose” and any state law having “a connection with, or reference to, airline ‘rates, routes, or services’ is preempted under the ADA.” *Morales v. Trans World Airlines, Inc.*, 504 U.S. 374, 383–85 (holding that the ADA preempted state regulation of airline disclosures and advertising); see *American Airlines, Inc. v. Wolens*, 513 U.S. 219, 229 (1995) (“States may not seek to impose their own public policies or . . . regulation on the operations of an air carrier.”). See also *Air Transp. Ass'n of Am. v. Cuomo*, 520 F.3d 218 (2d Cir. 2008) (recognizing and enforcing exclusive Federal jurisdiction, enjoining New York from implementing or enforcing New York State's Passenger Bill of Rights because it regulated airline prices, routes and services).

We also note, as a reminder, that the State of Minnesota is already obligated to “comply with all applicable Federal laws” as an assurance for its Federal grant agreements.⁴ The State’s failure to comply with the Grant Assurances could lead to a loss of tens-of-millions of dollars in FAA capital grants.

We appreciate you considering this request. Please do not hesitate to e-mail me at jsaltzman@airlines.org.

Sincerely,



Joshua M. Saltzman
Senior Vice President, Global Government Affairs
Airlines for America

⁴ FAA, *Assurances, Airport Sponsor* (Apr. 2025) available at https://www.faa.gov/airports/aip/grant_assurances/assurances-airport-sponsors-2025.