EXHIBIT 14

BAPTISTE & WILDER, P.C.

ATTORNEYS AT LAW

ROBERT M. BAPTISTE
rbaptiste@bapwild.com

ROLAND P. WILDER, JR.
rpwilderjr@bapwild.com

JAMES F. WALLINGTON
jwallington@bapwild.com

WILLIAM R. WILDER
wwilder@bapwild.com

STEPHEN J. FEINBERG
sfeinberg@bapwild.com

February 28, 2014

Via Electronic Mail

Mr. Daniel Rainey
Chief of Staff
National Mediation Board
1301 K Street, NW, Suite 250E
Washington, DC 20572

Re: Request of US Airline Pilots Association for panel of arbitrators under Section 13(a) of the Allegheny-Mohawk Labor Protective Provisions

Dear Mr. Rainey:

In accordance with the direction of the National Mediation Board through your letter dated February 27, 2014, the US Airline Pilots Association ("USAPA") responds to the letters submitted to the Board by American Airlines, Inc., US Airways, Inc. ("the Carriers") and the Allied Pilots Association ("APA") asserting that the NMB should not issue the panel of arbitrators requested by USAPA under Section 13(a) of the Allegheny-Mohawk Labor Protective Provisions due to a dispute among the parties concerning their obligation to resolve the ongoing seniority list integration dispute between the pilots of American and the pilots of US Airways under Section 13(a). Since the NMB performs only a ministerial function under Section 13(a) to issue the panel of arbitrators, it should reject the positions of the Carriers and the APA and issue the list of seven arbitrators as required under Section 13(a).

The McCaskill-Bond Amendment imposes the protections of Sections 3 and 13 of the Allegheny-Mohawk Labor Protective Provisions on the integration of seniority lists of employee groups involved in an airline merger. 49 U.S.C. § 42112, Note § 117(a). As the NMB is aware, Congress adopted the McCaskill-Bond Amendment in response to the unfair treatment of former Trans World Airlines employees by American and APA in the merger of American and TWA. Section 3 establishes a "fair and equitable" standard for integration of employee seniority lists. Section 13(a) provides in pertinent part:

> In the event that any dispute or controversy (except as to matters arising under section 9) arises with respect to the protections provided herein which cannot be settled by the parties within 20 days after the controversy arises, it may be referred by any party to an arbitrator selected from a panel of seven names furnished by the National Mediation Board for

1150 CONNECTICUT AVE., N.W.
SUITE 315
WASHINGTON, D.C. 20036
PHONE: (202) 223-0723
FAX: (202) 223-9677
www.bapwild.com

> consideration and determination. The parties shall select the arbitrator from such panel by alternatively striking names until only one remains, and he shall serve as arbitrator.

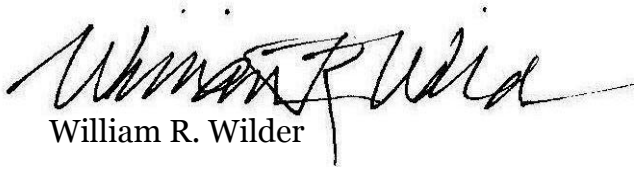
Section 13(a) entitles "any party" to a dispute under the LPPs, including Section 3, to refer the dispute to arbitration upon expiration of twenty days from the date the controversy arose. The arbitrator is to be selected from a panel of names provided by the NMB. Unlike disputes under Section 6 of the Railway Labor Act ("Act") where the parties' must reach impasse in their conferences over a dispute before the services of the Board may be invoked by a party, no impasse in the parties' negotiations over the Section 3 controversy is necessary for a party to refer the dispute to arbitration. And unlike Section 5, First of the Act, Section 13(a) of the LPPs does not give the NMB discretionary authority to evaluate the parties' dispute under Section 3 to determine if it should proffer its services to the parties. Section 13(a) simply provides that the Board is to issue a panel of arbitrators upon request of any party made more than twenty days after the controversy arose so that the dispute may be referred to arbitration for resolution. The duty of the NMB under Section 13(a) is a nondiscretionary "ministerial act" and it has no role in the resolution of the parties' Section 3 dispute. *See, e.g., New York Pub. Interest Research Group v. Whitman*, 214 F. Supp. 2d 1, 3 (D.D.C. 2006)(nondiscretionary duties of agency may be directed by a federal court as a ministerial act); *Pennsylvania v. Morton*, 381 F. Supp. 293, 298 (D.D.C. 1974)(an agency's ministerial act may be compelled by mandamus but not an action committed to agency discretion).

The controversy between USAPA, APA and the Carriers under Section 3 arose on December 9, 2013 with the closing of the merger between the Carriers. More than twenty days had expired from that date when USAPA President Hummel requested the panel of arbitrators from the NMB. Under Section 13(a), the NMB must issue that panel to the parties. The parties' dispute over their obligation to resolve the seniority list integration controversy under Section 13(a) will be resolved in federal court,[1] not before the NMB. The NMB must reject the attempts by the Carriers and APA to entangle it in their dispute with USAPA under Section 13(a) and the Board must promptly proffer the requested panel of arbitrators.

[1] The position of APA and the Carriers regarding the parties' obligations to resolve their seniority list integration dispute under Section 13(a) is without merit. USAPA filed a lawsuit against American, US Airways and APA on February 27, 2014, in the United States District Court for the District of Columbia, Civil Action No. 14-328, to compel the defendants' compliance with the Section 13(a) procedures for resolution of the pilot groups' seniority list integration dispute.

Thank you for the Board's prompt attention to this matter.

Respectfully submitted,



William R. Wilder

cc: M. Johnson
G. Hummel
B. O'Dwyer
P. Szymanski
R. Siegel
C. Hollinger
E. James
T. Senanayake
W. Kennedy