



## Airlines for America®

*We Connect the World*

March 10, 2026

The Honorable Joseph J. Solomon, Jr., Chair  
House Corporations Committee  
Rhode Island State House  
82 Smith Street  
Providence, RI 02903

The Honorable Justine A. Caldwell, Vice Chair  
House Corporations Committee  
Rhode Island State House  
82 Smith Street  
Providence, RI 02903

The Honorable William W. O'Brien, Vice Chair  
House Corporations Committee  
Rhode Island State House  
82 Smith Street  
Providence, RI 02903

### **Re: A4A's Position and Recommendation for House Bill 7847**

Dear Chair Solomon, Vice Chair O'Brien, Vice Chair Caldwell and Members of the Committee,

Airlines for America (A4A) is the trade association for the leading U.S. airlines.<sup>1</sup> We advocate on behalf of our members to shape policies and measures that promote safety, security and a healthy U.S. airline industry. We write to respectfully express our opposition to Rhode Island House Bill 7847, *An Act Relating to Commercial Law – General Regulatory Provisions – Unfair Sales Practices* (“HB 7847”), because it is federally preempted. We strongly urge the Committee to vote against a recommendation of passage.

As proposed, HB 7847 would regulate airlines to protect consumers from unfair and deceptive practices, specifically imposing: (i) records requirements with respect to airline tickets or flight vouchers; and (ii) a prohibition on service or maintenance charges or expiration dates for airline tickets or flight vouchers. While A4A supports efforts to protect consumers from unfair or deceptive conduct, including unscrupulous ticketing or voucher practices, state regulation of airline prices and services (including how tickets, vouchers, fares, and fees are set and offered) is an area that Congress has reserved exclusively for the federal government. In fact, federal law already provides robust protections for consumers:

With the Airline Deregulation Act of 1978 (“ADA”), Congress sought to place “maximum reliance on competitive market forces” to encourage “an air transportation system relying on actual and potential competition.”<sup>2</sup> To that end, Congress included an express preemption provision in the ADA to “ensure that the States would not undo federal deregulation with regulation of their own.”<sup>3</sup> Specifically, the ADA provides that a state “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.”<sup>4</sup> The U.S. Supreme Court has recognized the ADA’s “broad pre-emptive purpose” and held that state laws having “a connection with, or reference to, airline ‘rates, routes, or services’” are preempted.<sup>5</sup> In sum, HB 7847 relating to airlines’ ticket and voucher practices is federally preempted and unenforceable against airlines.

---

<sup>1</sup> 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.

<sup>2</sup> 49 U.S.C. § 40101(a)(12).

<sup>3</sup> *Morales v. Trans World Airlines, Inc.*, 504 U.S. 374, 378–79 (1992).

<sup>4</sup> See 49 U.S.C. § 41713(b)(1) (emphasis added).

<sup>5</sup> *Morales v. Trans World Airlines, Inc.*, 504 U.S. 374, 383 – 384.

The failure of HB 7847 to advance beyond the House Corporations Committee would not leave airlines unregulated with respect to the ticket and voucher practices. It would, however, avoid unnecessary and costly litigation that would undoubtedly result in a finding that the act is federally preempted. The ADA authorizes the U.S. Department of Transportation (“DOT”) to prohibit air carriers and ticket agents from engaging in “unfair or deceptive practice or an unfair method of competition” in the sale of air transportation that results or is likely to result in consumer harm.<sup>6</sup> In fact, airlines already adhere to several federal laws—including DOT regulations regarding unfair and deceptive practices—regarding airline ticket and voucher practices, including: preservation of records related to tickets, vouchers, coupons, and refunds;<sup>7</sup> a prohibition on and notifications of potential post-purchase price increases;<sup>8</sup> and refund and voucher terms.<sup>9</sup>

We appreciate your consideration of our perspective and strongly recommend that the Committee vote against passage of HB 7847. If you have any questions or comments, please do not hesitate to email me at [jsaltzman@airlines.org](mailto:jsaltzman@airlines.org).

Respectfully submitted,



Josh Saltzman  
Senior Vice President, Global Government Affairs  
Airlines for America

---

<sup>6</sup> 49 U.S.C. § 41712.

<sup>7</sup> See 14 C.F.R. part 249 (including preservation of ledgers, voucher distribution registers, ticket sales, ticket refund claims records and reports, and flight coupons).

<sup>8</sup> See 14 C.F.R. §§ 399.88 – 399.89.

<sup>9</sup> See e.g., 49 U.S.C. § 42305 (regarding refunds for cancelled or significantly delayed or changed flights); 14 C.F.R. § 259.5(b)(6) – (7) (regarding airline customer service plan requirements for travel credits or vouchers); 14 C.F.R. parts 260 and 262 (regarding airline refunds and vouchers). See also 14 C.F.R. § 399.80 (regarding unfair and deceptive practices of ticket agents).