

The United States requests, pursuant to Article 31-A.4.2 of the United States-Mexico-Canada Agreement (USMCA), that Mexico conduct a review of whether a Denial of Rights is occurring at the Aerotransportes Mas de Carga, S.A. de C.V. (the company) in Mexico City (the Facility). As defined in USMCA Article 31-A.2, a Denial of Rights occurs when workers are being denied the right of free association and collective bargaining under laws necessary to fulfill a Party's obligations under the USMCA.

The United States is concerned that workers at the Facility are being denied the right of free association and collective bargaining as a result of interference in pilots' union activities. This request for review encompasses all actions taken by the company to support or exercise control over *Sindicato de Trabajadores de la Industria Aeronáutica, Comunicaciones, Similares y Conexos de la República Mexicana* (STIA), including jointly holding meetings with STIA at the Facility, incentivizing worker support for STIA, and otherwise coercing or encouraging worker support for the union and discouraging worker support for *Asociación Sindical de Pilotos Aviadores de México* (ASPA). This request for review encompasses all actions taken by the company to retaliate against individuals based on union activity, including asking ASPA pilots to resign based in whole or part on their union activity, union affiliation, statements regarding the unions, statements or actions regarding the company's interference in union activity, or statements or actions regarding the company's actions with respect to the May 9, 2023, legitimization vote.

The United States is also concerned that pilots at the Facility are being denied the right of free association and collective bargaining in connection with their right to approve their governing collective bargaining agreement and the May 9, 2023, legitimization vote. This request for review encompasses all actions taken by the company and STIA to deny the pilots the opportunity to vote on a collective bargaining agreement that accurately sets out their terms and conditions of work if approved, failure to distribute the correct collective bargaining agreement in a manner consistent with Mexico law, and any other irregularities in connection with the May 9, 2023, legitimization vote.

The actions encompassed by this request for review include those of any person or entity, including the company and STIA, and any of their employees, representatives, or agents.

If Mexico were to determine that there is a Denial of Rights, the United States further requests, pursuant to USMCA Article 31-A.4.2, that Mexico attempt to remediate within 45 days of this request. We look forward to receiving Mexico's notification of whether it intends to conduct the requested review.¹

¹ USMCA Article 31-A.4.2 ("The respondent Party shall have 10 days to notify the complainant Party as to whether it intends to conduct a review.").