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29.07.2014

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Via email : info@aviation.reg.ie

Lufthansa & SWISS comments on the CAR Draft Determination for the DAA price caps 2015-2019

Dear aviation regulation team,

thank you for your invitation to comment on the price cap for Dublin Airport Charges 2015 – 2019.

We appreciate and support your proposal for the DAA price caps 2015-2019 of RPI – 4,8% p.a. . This is an important step to support the airline industry in a highly competitive and challenging environment.

We have noticed that important projects in relation to accommodating growth, improving passenger experience and creating a level playing field across the terminals have been reduced respectively disallowed by CAR.

Additionally to the detailed comments you will be receiving via IATA, we would like to emphasize that affordability is crucial, but T1 redevelopment resulting in enhanced security capacity and improved passenger experience are of major importance to avoid distortion of competition.

In view of the favourable conditions at the capital markets, we assume that a reduced cost base can be achieved by further challenging the WACC. Additionally, investment capability should be improved by further increasing efficiency and reducing operational expenses – instead of reducing necessary capital expenditure.

Thank you for your consideration of our position.

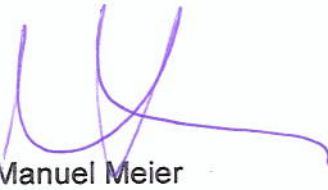
Yours sincerely

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c/ IATA Colin Spear & Cesar Raffo