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Our ref: BEBJ

Your ref.

Date: 30<sup>th</sup> July 2014

### **Response to Airports Charges Draft Decision Paper.**

Dear Sir,

Norwegian Air Shuttle operates to three countries at Dublin competing with both full service and low fares airlines to attract customers. Fast, efficient and safe operations, with a strong emphasis on punctuality, are central pillars to our business model, and what our customers value also. In the last six months we have secured an Irish AOC (Norwegian Air International Ltd) and see strong development potential to add further services for our low cost and long haul business models.

In Dublin, we operate from Terminal 1 and face direct competition on the routes we serve not only from other airlines operating from this terminal, but also from airlines operating from Terminal 2. It is obvious that there is not a level playing field in respect of the two terminals despite the airport taxes are the same.

Therefore, we wish to express our support for the full implementation of the T1 refurbishment program, as it will allow our passengers to experience the same product offering that our competitors in T2 can offer currently. We agree with your proposed allowances for Fixed Electrical Ground Power and a Baggage Reconciliation System for T1, both of which will improve efficiency and are currently available in T2. We note that you propose to disallow the Pier 3 Flexibility Project. This project is important to deliver a structure capable of providing three airbridges and a new gate area sized to facilitate 787 aircraft with increased contact gate capacity. This project would support the development of our long haul capability and so we would be interested in seeing it proceed.

The passenger screening area, together with the baggage handling system, is one of the most critical facilities on an airport and it is extremely important that this is working sufficient and with the needed capacity. All prognoses shows that the traffic is growing and when we today are facing challenges with unacceptable queuing in T1 resulting in delayed departures, it is important to act before the situation is getting out of control. It is important for both the airlines and the airport that the passengers spend their time in the commercial areas and not queuing in check-in and security lines.

Additionally in the terminal, we therefore support the funding of screening equipment necessary to meet the LAGs and ETD screening requirements and HBS Standard 3. Passenger screening must be fast and efficient to allow us to meet our punctuality targets, which underpin our business strategy. We note also that screening requirements can change very quickly (usually upwards) and that the airport must be in a position to respond flexibly and quickly to any further changes which may occur over the period. Norwegian is interested in investments which make for faster and more efficient operations without comprising safety. Dublin Airport has a high passenger screening rate at security and investment to maintain this process speed with increased compliance regulation should be made i.e. the automatic tray return system as part of the security screening equipment project.

On the airfield, we support the airfield infrastructure upgrades for large aircraft – this project is essentially a safety concern and will improve safety for our B787 pilots at Dublin. Runway capacity is also important and we support the Additional Line-up Points on Runway 10-28 as this project will provide more flexibility for ATC to sequence aircraft for departure (SID efficiency) and deal with tactical operational issues (aircraft slot issues, aircraft technical difficulties) and reduce ramp congestion. With regard to the timing of investment in a second runway, Norwegian would support the commencement of this infrastructural project before the current runway is full at peak times, so that it will be delivered by the time the peak is full – Norwegian endeavours to maximise the use of our capital intensive aircraft fleet – to do this Dublin must have departure and arrival slots available at times which fit our business model.

Norwegian is seeking to grow and develop our business at Dublin Airport; for this to happen there must be the right infrastructure at the airport to support our requirements and those of our passengers.

I stand at your disposal should you have any questions related to Norwegian or our response.

Best regards

A handwritten signature in blue ink, appearing to read "Bjørn Erik Barman-Jenssen".

Bjørn Erik Barman-Jenssen  
SVP Ground Operation, In-Flight Services & Cargo  
Norwegian Air International Ltd.