

Dr. Maria Baquero  
Economist  
Commission for Aviation Regulation  
Earlsfort Terrace  
Dublin 2.

31st July 2020

Dear Maria,

This document provides Aer Lingus' response to the Commission for Aviation Regulation's consultation on proposed ANSP charges for 2021 as set out in CP6/2020. With regard to the 2019 actual costs, Aer Lingus' assumes that the CAR have had oversight of the reported costs and therefore, if the CAR accepts the validity of these reported costs then Aer Lingus accepts the 2019 actual costs as reported in CP6.2020

### **Proposed ANSP Charges for 2021**

Aer Lingus notes that the proposed rates for en-routes and terminal navigation for 2021 represent an increase of 13% and 32% respectively on the 2020 rates. While the actual formula for calculation of the rates is not in question, the continued validity of the inputs to that calculation is certainly open to challenge. The inputs on costs and traffic volumes used in the calculation are, as Aer Lingus understands, taken from the draft RP3 business plan. This is a business plan which, firstly, has not yet been approved at the EU level and secondly, could not have taken account of the impact of Covid-19 on the aviation industry, being prepared before the implementation of travel restrictions in the various jurisdictions. As the timeline for RP3 approval is sometime in the first half of 2021, and given the very severe downturn which has occurred, it is inappropriate that rates be set on the basis of the, as yet, unapproved RP3 plan.

It is Aer Lingus' view that the 2021 rates should not be increased above the 2020 rates and preferably they should be lowered to reflect the commercial circumstances expected in 2021. To allow increases of the magnitude being sought by the IAA would only add to the woes of the airline industry and likely impede recovery to previous traffic levels.

Thank you for the opportunity to make this input into the process for setting the 2021 en-routes and terminal navigation rates for the ANSP. If any areas of the above feedback are unclear we would be happy to arrange a call with you to rectify.

Regards,  
Valerie Ní Fhaoláin