

Ref: 275.01

6 July 2001

Mr William Prasifka  
Commissioner  
Commission for Aviation Regulation  
36 Upper Mount Street  
Dublin 2

Tel: (353-1) 886 3255

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**Re: Proposed Maximum Levels of Aviation Charges  
Commission Paper CP6/2001**

Dear Commissioner,

I refer to your notice in the above regard dated 26 June 2001, issued pursuant to Section 32 (7)(b) of the Aviation Regulation Act, 2001.

As you will be aware FLS Aerospace operates at Dublin Airport as a provider of aircraft and aircraft component maintenance, repair and overhaul and related technical and engineering services. These services require the attendance of our customers' aircraft at our hangars and the delivery of their components to our Dublin workshops. This results in a busy operation that annually generates about eight hundred aircraft movements and considerable airfreight activity at Dublin Airport.

Your draft determination is concerned with proposed maximum levels of Airport Charges, which are levied directly against airlines by Aer Rianta and would appear therefore not to have any implications for us. It is important to understand however, that Airport Charges (as defined in section 2 of the Air Navigation and Transport (Amendment) Act, 1998) do indeed impact upon the cost to our customers of delivering aircraft to us at Dublin Airport. In addition, Dublin airfreight charges constitute a considerable overhead cost for our customers and us. Accordingly, as any increase in Airport Charges will have cost implications for our business, your final determination in this regard will be a matter of interest to us.

Accordingly, we request you to consider our position in regard to the proposed maximum level of Airport Charges for Dublin Airport and to regard this letter as a representation made under section 32 (7) of the Aviation Regulation Act, 2001.

Yours sincerely

John O'Shea  
Group Legal Affairs Manager &  
Company Secretary