

*Strictly Private & Confidential*

16 October 2017

**Commission for Aviation Regulation**  
**3<sup>rd</sup> Floor Alexandra House**  
**Earlsfort Terrace**  
**Dublin 2**  
**Email: [info@aviationreg.ie](mailto:info@aviationreg.ie)**

*By e-mail only*

**Re: Passenger Representation in Regulatory Decision Making**

Dear Sir / Madam,

I refer to CAR's paper 9/2017.

As previously indicated by Ryanair, airlines are the best proxy for passenger expectations, whose key requirement is low fares which are made possible by low airport charges. CAR should therefore engage directly with airlines in order to understand passengers' expectations.

If, however, CAR proceeds with its proposal to provide guidance to Dublin Airport, the specific guidance should be subject to consultation with relevant stakeholders. This will ensure that the DAA monopoly or vested interested groups do not produce "willingness-to-pay studies" which are misleading as passengers' responses do not translate into reality when air fares are necessarily increased to pay for "improved" airport facilities.

In addition, any form of financial incentive for the DAA monopoly, or the establishment of ad hoc panels would be misguided as these are unnecessary and costly measures.

Yours sincerely,

---

Matthew Krasa  
**Manager – EU & Competition Law**