

Commission for Aviation Regulation
3rd Floor
Alexandra House
Earlsfort Terrace
Dublin 2

14th January 2009



Dear Sirs

Response of OCS to the Notice on PRM Charges at Dublin Airport (Commission Notice 5/2008) & Subsequent Submissions

OCS One Complete Solution Ltd is in the business of providing dignified and efficient passage through airports for persons of reduced mobility in line with ECAC 30. Following a tender process we were awarded a contract commencing on July 26th 2008 and since that time we have achieved the service levels stipulated in our contract. The contract mobilisation involved considerable investment by OCS and has attracted many plaudits for the work and attitude of the OCS staff operating the service.

We are not involved in the dispute between the DAA and some Airlines regarding the charge for this service nor do we wish to become involved in the various relationship issues prevalent in Dublin Airport. We do however have commercial interests to protect and we further find ourselves in a position whereby a number of misleading statements about our charges and service have been placed in a public forum. We will therefore limit our response to the two specific areas which directly pertain to OCS, namely charges and service and we request that our response is also published.

CHARGES

In the CAR Notice and subsequent submissions from Airlines and the AOC reference is made to the charges being excessive and from 3 times to five times higher than previously applied in Dublin Airport.

Our response is as follows:

- A service level in line with ECAC 30 was incorporated in the tender documents issued in early 2008; OCS won that tender fairly in line with the published award criteria. A number of other experienced suppliers also

OCS One Complete Solution Limited
Century House
Richmond Industrial Estate
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Dublin 1

T +353 (0)1 855 6791

F +353 (0)1 855 6594

Callsave 1850 675747

www.ocsireland.com

tendered and our tender was considered the most economically advantageous. Unsuccessful tenderers or any other party had the right to object to the award during the two week standstill period and did not do so. If our charges were excessive we could not have won the tender.

- Our charge to the DAA compares favourably to those levied in other European Airports despite two factors likely to increase the price. Firstly, Dublin Airport makes relatively little use of airbridges compared to other major airports. Apart from the comfort of the passenger, use of an airbridge to board a PRM is faster and requires less manpower and equipment. It is therefore a less expensive service to operate. Secondly wage costs in Ireland are on average higher than in other European Countries.
- ECAC 30 requires that PRM charges are allocated to Airlines based on their share of total passengers moving through the airport rather than their share of the number of PRM'S carried. If an Airline carries a smaller number of PRM's as a % of their total passenger population than the average across all airlines, it follows that their PRM charges will increase. Such an increase would occur without any increase in charge from the Service Provider.
- We have some difficulty with the claims made regarding previous charges applying in Dublin Airport. Obviously, as operators in a competitive European Marketplace we have knowledge of prevailing charges in various airports and we simply do not accept that the charge per PRM passenger levied by OCS is 5, 4, 3 or even 2 times that previously charged in Dublin Airport. We note that while various claims of multiples are made, no specific charge per PRM passenger to any Airline from any service provider has been provided.
- The make up of our pricing and cost models is a matter for OCS. It is unheard of in our opinion for a supplier of a public contract to be asked to make commercially sensitive information of this nature widely available.
- The Directive requires minimisation of manual handling of passengers and this increases the costs significantly but goes to the very heart of the Directive. Our bid price would indeed have been lower if the Directive had specified that manual handling was acceptable.
- As can be seen from the SLA reports the volume of PRM's has, as expected, increased due to the implementation of the Directive. This also increases the total cost to the airlines.

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SERVICE LEVELS:

In submissions now published a number of references are made to the level of service provided by OCS.

- We note that in CAR notice issued on December 8th, “the AOC accepted that OCS was providing a better service than the previous incumbent service provider at Dublin airport”.
- OCS has achieved the Service Levels in our contract at all times from the outset of the contract. This data has been provided to both the AOC and the DAA. Within weeks of the contract start the AOC and individual Airlines began to cancel planned weekly meetings as “there are no service issues to discuss”.
- At a meeting with the DAA on April 30th we advised that we would need at least 3 months to roll out the service. Despite this the Tender process did not finish until two weeks after our initial contract award notification on May 22nd. Indeed we only signed our final contract on July 9th. Whilst we were able to have equipment on site and staff hired and trained not all staff had been issued with security passes and could not therefore operate airside. This caused some minor initial problems but all Airlines & the AOC congratulated OCS on the successful start up which again was within agreed service level agreements.
- At a meeting with the AOC in May last we stressed the importance to operational efficiency of pre-notification of arriving passengers but thus far the % of pre-notified passengers is less than 50%. As the service level for non pre notified is lower there is a direct impact on turn around times. As an illustration the service level agreement allows OCS 35 minutes to disembark 10% of arriving passengers not pre-notified and some Airlines have a target turnaround of 20 minutes. Any suggestion that the service levels be reduced further seems extraordinary to us.
- Our responsibility for service lies not just in turnaround time for airlines, where we have overachieved, but in the quality of service provided to PRM’s. In this regard we appreciate the submissions of the various bodies representing disability groups regarding the quality of service provided.
- We attach our SLA from Start up to December 08 which we believe speaks for itself as to the quality of service. We also have numerous written compliments from passengers which we are happy to provide to the Commission.

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OCS value our relationship with the various stakeholders involved in this process including the Commission, the DAA, the Airlines and the Disability User Groups. We are happy to meet as often as is necessary with any or all of the above parties but we also trust that all parties will understand our need to protect our commercial position and reputation.

Yours Sincerely

A handwritten signature in blue ink, appearing to read "Cecil Ryan".

Cecil Ryan
Regional Managing Director-Europe

Summary of Performance Against SLA

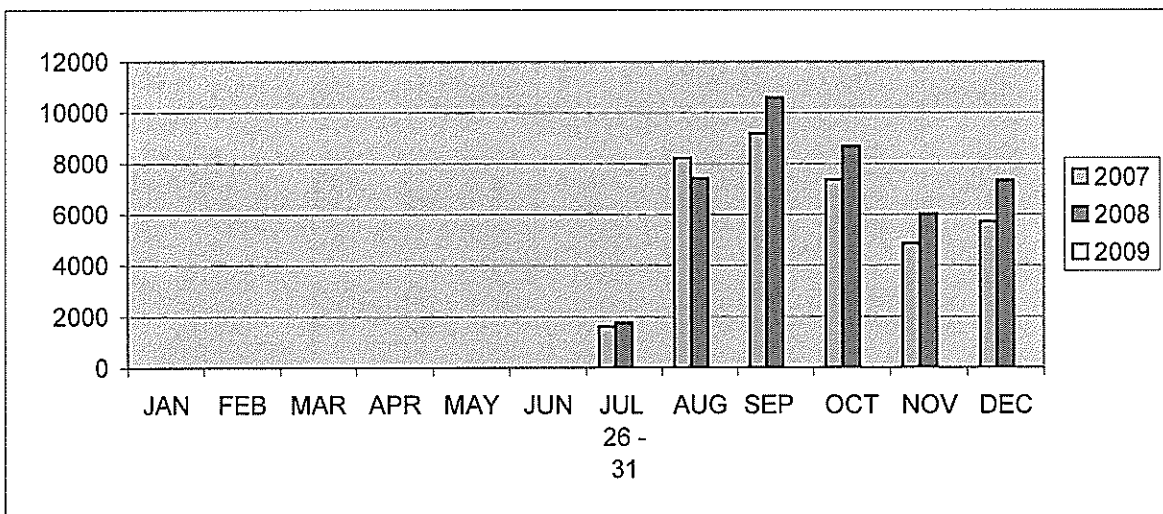
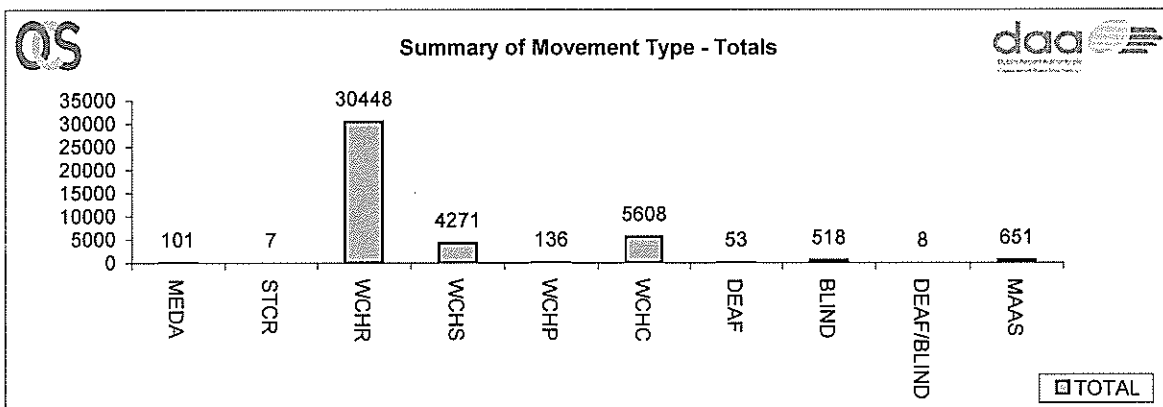
2008

OUTBOUND

	SLA - Pre-Advised				SLA - Non-Advised			
	≤ 10min	≤ 20min	≤ 30min		≤ 15min	≤ 25min	≤ 35min	
TOTAL	8608	357	20	8985	12578	315	5	12898
ACTUAL %	96%	99%	100%		97%	99%	100%	
TARGET %	80%	90%	100%		80%	90%	100%	

ARRIVALS

	SLA - Pre-Advised				SLA - Non-Advised			
	≤ 5min	≤ 10min	≤ 20min		≤ 15min	≤ 25min	≤ 35min	
TOTAL	9023	508	66	9597	9958	344	19	10321
ACTUAL %	94%	99%	100%		96%	99%	100%	
TARGET %	80%	90%	100%		80%	90%	100%	



DATE	2007	2008	var
JUL 26 - 31	1,595	1,750	10%
AUG	8,214	7,421	-10%
SEP	9,194	10,596	15%
OCT	7,362	8,669	18%
NOV	4,852	6,017	24%
DEC	5,408	7,348	36%
TOTAL	36,625	41,801	14%