

By Fax: +353 1 66 11 269

12th December 2003

Mr Bill Prasifka
Commissioner
Commission for Aviation Regulation
3rd floor, Alexandra House
Earlsfort Terrace
Dublin 2.

Subject: Comments on the Addendum to CP4/2003

Dear Bill,

Thank you for the opportunity to comment on the Addendum to CP4/2003 which I have detailed below:

1. Paragraph 5.3 "*ACN's are calculated for rigid pavements with a C (Low) sub grade strength.*"

Can you clarify why Sub Grade Low was used? Our data shows that Rwy10/28 at DUB is Sub Grade Medium.

2. Para 5.3 "*The commission is of the view that ACNs calculated on the basis of an aircraft's operating weight (where this is different to the MTOW) would better reflect the load being imposed on pavements by a landing of that aircraft ...*"

We would support this process; as the Freight/Integrator side of the Industry rarely if ever operates at MTOW.

3. We would welcome a similar review of the charging for Peak/Off Peak Parking at Dublin by the Commission of Aviation Regulation. We feel the current situation is discriminatory against the cargo sector and prohibitive to cargo/transportation growth at Dublin.

We would be pleased to supply full fleet details if required. Please confirm what exactly would be required?

Yours sincerely,



John Rawl
Operations Manager

