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Operations
Directorate

An Stiúirthóireacht
Oibríochtaí

25th September 2019.

Adrian Corcoran
Commission for Aviation Regulation
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Dublin 2

The IAA Air Navigation Service Provider (the 'ANSP') notes the content of the Draft Decision on Summer 2020 Co-ordination Parameters at Dublin Airport (Ref: Commission Paper 6/2019 dated 4th September 2019) ('the Commission Paper').

The ANSP does not support the Dublin Airport Authority (daa) proposals for a net increase of 4 movements per day for Summer 2020 as set out in the Commission Paper. Throughout the development of the Commission Paper ANSP representatives consistently raised operational concerns with the proposed increase, including the potential;

- (i) difficulty in accommodating existing traffic demand and the impact that a further increase in slots would have;
- (ii) increased complexity of operations on the manoeuvring area whilst maintaining safety of operations;
- (iii) severe disruption resulting from the significant volume of concurrent infrastructure construction activities.

We recognise the benefits from the infrastructural enhancements but the impact from the construction phase should not be viewed as minor work as it limits available operational surfaces during the busy summer period. The ANSP's view is that the evaluation process is flawed as simulation modelling did not take sufficient consideration of the impact from the construction works. Such work, which is 'shifting' as it progresses, adds complexity and additional workload on both flight crews and air traffic controllers.

Experience demonstrates there is limited resilience at Dublin Airport to maintain capacity and traffic throughput should an operational disruption occur. This year alone has shown the significant delays and disruption caused by poor weather and a temporary need to close a single runway, illustrating the existing pressure on airport airside facilities and infrastructure capacity from contingent events. Furthermore, recent senior manager airport stakeholder meetings have examined mitigations around reduced on-time-performance and airport delay issues. It is in this environment that ANSP feels that efficiency gains should be used for contingency purposes rather than increased slots given that Dublin Airport is effectively operating at or close to capacity for many hours during the summer day.

Bord Stiúirthóirí/Board of Directors

Michael McGrail (Cathaoirleach/Chairperson),
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It remains the ANSP's commitment to supply, to the maximum extent possible, an efficient, high quality service to aircraft operating at Dublin Airport. We do not believe that adding additional slots at Dublin Airport at this time is appropriate or practical, given the concerns which we have raised.

Yours sincerely,

Regards

Paul

A handwritten signature in black ink, appearing to read 'Paul McCann', written over a horizontal line.

Paul McCann
General Manager Terminal Services
Irish Aviation Authority

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