



RYANAIR

Ryanair Dublin Office
Airside Business Park
Swords
County Dublin
Ireland
Telephone: +353 1 945 1212
Website: www.ryanair.com

Strictly Private & Confidential

19 July 2017

Luke Manning
Economist
Commission for Aviation Regulation
Alexandra House, Earlsfort Terrace
Dublin 2
Email: lukemanning@aviationreg.ie

By email only

Re: Response to Consultation on Revising the Slot Sanction Scheme Guidelines

Dear Mr Manning,

Please find below our comments on the Commission's consultation. Our silence on any particular issue should not be taken as consent.

The proposed removal of the six month element from the definition of "repeatedly" in Article 3.5 of the Guidelines would cause uncertainty for airlines. In order to avoid such uncertainty, and consistent with the fact that slots are allocated on a seasonal basis, slot usage should be assessed on a seasonal basis, as is standard at other European airports.

Slot misuse, if properly investigated, should result firstly in warnings and thereafter in fines. In certain circumstances slot misuse can ultimately lead to the loss of historic slot. These sanctions are adequate to ensure that airlines are discouraged from misusing slots. As such, publishing details relating to uncontested sanctions is unnecessary.

I hope this is helpful, and am available should you require further information.

Yours sincerely,

Colin Casey
Director of Schedule Development