

*Received by email*

To Whom It May Concern,

Please find below our comments with respect to the amended guidelines for DUB (and IE).

In principle, we don't object to the intent of the proposal as we would all expect a carrier to operate the slots awarded and if not (and intentionally) some measured approach to a penalty should be levied to change behavior.

Given that we are not a carrier that would "intentionally" misuse our slot holdings, this causes little concern. Additionally, this policy has been in place since we started flying and we have not had issues to date.

That said, the few points worth further thought and discussion:

- There is no mention of factors outside of the carrier's control like weather, en-route winds, etc. Potential issues with block time variability and subsequent downline delays.
- There is no defined tolerance for misuse other than saying times exceeding the time intervals of the airport's declared coordination parameters, so it is difficult to provide guidance to OCC. (no easily measurable limit like A15)
- The penalty (value € ) are unchanged other than language clarifying per incident, for example what might have been a 'bad jet-stream' week could have been one fine the new language is 7 (or 14 if round trip slots are off).

Thank you for the opportunity to provide input.

Sincerely,

Lorne Mackenzie  
Senior Manager Regulatory Affairs  
WestJet