



Third Interim Review of the 2019 Determination at DUB airport

IATA response to CAR's Options of Timeline and Period in Force

This submission presents the response of the International Air Transport Association (IATA). IATA's mission is to represent, lead and serve the airline industry and brings together some 300 airlines or 83% of total air traffic.

IATA welcomes the opportunity to provide comments to the Commission for Aviation Regulation (CAR) on Options for Timeline and Period in Force of the Third Interim Review of the 2019 Determination.

In its draft determination the CAR proposed a 4-year price path in order to provide certainty to the airport and airlines for the recovery phase post COVID as well as assisting with a large capital investment plan. In this regard, splitting (i.e., shortening) the determination may break that balance and may be used to delay the delivery of the capital investment program. In addition, there has been a significant number of resources invested on a 4-year determination that would be partially lost.

Based on the above and the fact that the approval of the ATNB is at a very advanced stage, we consider Option 1 as our preferred option. If the approval goes beyond December 23, we suggest the CAR to wait until the law is enacted before it makes its final decision. That is, even if the delay goes beyond 28 February. In the meantime, the CAR could provide guidance to allow the setting of the 2023 charges while it makes a final determination.