

16<sup>th</sup> November, 2017

Mr. Luke Manning,  
Economist  
Commission for Aviation Regulation,  
Alexandra House,  
Earlsfort Terrace,  
Dublin 2.

Dear Luke,

Further to the publication of the draft final report “Capacity Assessment at Dublin Airport for the purpose of setting slot coordination parameters” by Helios on 13<sup>th</sup> October and presentation on same on 19<sup>th</sup> October 2017 Aer Lingus wishes to provide the following feedback.

In line with our previous submission relating to the Helios Capacity Assessment, Aer Lingus position remains consistent. Aer Lingus does not accept the findings of the Helios report on its modelled impact assessment on the proposed capacity changes.

Aer Lingus believes that the Helios modelling is flawed in certain areas and needs to be updated and revised to produce a more credible basis for decision making. The modelling is limited and omits key constraints.

The reports practical value is undermined by the academic leaning nature of the study that in fact materially understates the real impact of capacity constraints by over-simplification of assumptions and ready acceptance that constraints can easily be overcome in the real world.

Whilst the Helios findings touch upon many of the capacity constraints that exist at DUB, there is a clear imbalance in terms of the rigour applied to the modelling of runway and taxiway impacts (albeit with inherent weaknesses) when compared to other critical infrastructure areas such as terminal capacities. By way of illustration, hourly averages are no substitute for 15 minute volumes and the use of average SLF assumptions understates peak demand.

The reality is that infrastructural constraints at Dublin Airport are already leading to unacceptable levels of deteriorating operational efficiency and guest service levels and with planned growth this can only get worse from S18 and beyond.

Aer Lingus have reservations in that the impact study only goes as far as S18 and not beyond where in fact our own simulations clearly show that without immediate implementation of capacity solutions across key infrastructural areas that the airport has the potential to clog up by S19/20.

The report also lacks conviction that there are critical infrastructure issues that need to be addressed. Instead the report implies that the capacity constraints are mildly inconvenient.

It is of serious concern to Aer Lingus that the Helios assessment of capacity indicates that there could be significant growth with only minor infrastructural development with increased delays and towing funding it.

Aer Lingus has previously provided detailed feedback on the weaknesses of the Helios modelling in particular namely ACDM assumptions; report inconsistencies; key capacity constraints omissions; and operational impacts on Aer Lingus. These weaknesses are not addressed in the final draft report.

### **Terminal Capacity**

With respect to CBP and the Helios view on passenger processing capacity, Aer Lingus believes this facility is fundamental to its customer proposition and the existing constraints given projected demand are understated thus undermining the absolute necessity for CBP capacity expansion solution.

As previously stated throughout the consultation process, Aer Lingus growth ambitions are dependent on Dublin airport facilitating a home based hub carrier and provision of adequate capacity solutions at CBP puts at risk IAG investment plans.

Aer Lingus also believe that the transfer baggage handling capability is particularly inadequate. There is need for early bag store handling capability of c.1000 bags as is the practice in most major European hub airports. Carousel provision also needs to be increased.

Dublin Airport clearly recognises the growth in both transfer passengers and North Atlantic passenger numbers as a key driver behind overall passenger growth at DUB and this further serves to highlight the need for appropriate infrastructure investment to address capacity constraints.

### **South Apron**

South Apron infrastructure is poor and operational efficiency will get significantly worse in future with greater utilisation of PBZ and Pier 4 South stands arising from both increased movements and towing requirements. Additional towing cannot be countenanced as an acceptable solution.

It is Aer Lingus view that recommendations should have included improvements to B1/Z taxiway access to South Apron; however, this does not feature in the Helios report.

### **Fire breaks**

Firebreaks, two naturally occurring firebreaks exist at Dublin at the moment and Helios suggested possibility of adding additional firebreaks based on a short haul point to point type of operation. Aer Lingus believe that the firebreaks suggested have the potential to limit capacity during hours where future transatlantic growth is planned. Without appropriate

communication prior to modelling exercises, the risk is that output is unaligned with actual growth plans or indeed counter intuitive.

### **Scheduling**

Aer Lingus recognises that 5 minute scheduling is used at heavily congested airports to reduce bunching within 10/15 minute periods however it would be the view of Aer Lingus that further benefit could be gained from evaluation of the performance of ACDM before contemplating introduction of 5 minute scheduling.

### **Declaration process**

Declaration process timelines were significantly out of line with what is experienced at other coordinated airports. The schedules input was taken too early in the planning process. Aer Lingus along with other stakeholders would prefer to see the CAR use industry standard timelines in line with the IATA process. This will ultimately result in the earlier placement of capacity with parties who will use it subsequently.

### **Summary**

Aer Lingus, as stated throughout engagement with Helios, does not accept the findings of the Helios report on its modelled impact assessment on the proposed capacity changes due to the limitations and constraint omissions.

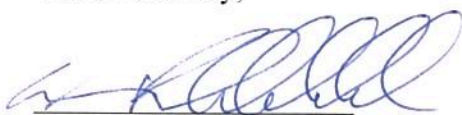
We believe that the net effect of not considering key capacity constraints and operational impacts in the Helios modelling is to understate the negative impact on delays and taxi times at DUB.

The Aer Lingus business plan is to deliver significant passenger growth, primarily through its North Atlantic long haul business, which will lead to an increase in its connecting passengers. Growing connecting traffic has been a stated strategic objective of both Aer Lingus and the daa.

Aer Lingus therefore requests that CAR ensures that the feedback regarding the weaknesses reflected in the Helios modelling and indeed the real capacity challenges faced by Airport as outlined in our submissions are fully considered before making any decision in the future.

I look forward to your response.

Yours sincerely,



Greg Kaldahl  
Chief Strategy and Planning Officer