



Brídín O'Leary,
Commission for Aviation Regulation,
3rd Floor,
Alexandra House,
Earlsfort Terrace,
Dublin 2

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Response to Quality of Service Consultation Paper

Dear Ms O'Leary,

I am writing in response to the consultation on Quality of Service at Dublin Airport. Below are some brief responses to the questions posed.

How should quality of service at Dublin Airport be defined?

The needs of business users should be given key consideration when defining quality of service at Dublin airport. Of the 23.24 million passengers that travelled through Dublin Airport in 2007, 20 per cent were business travellers. Given the importance of the business passenger to Dublin Airport revenue, services geared towards a business traveller should be explicitly included in the quality of services indicators. Business services should include access to sufficient suitable spaces for reading, using laptops, and making telephone calls. Wifi availability and quality, and the availability of power outlets to charge mobile phones and use laptops are also important for business travellers.

The indicators should concentrate on services under the control of Dublin Airport. Ensuring an adequate amount of non-commercial seating is of primary importance. While Dublin Airport cannot control the number of taxis available to passengers it can control the taxi queue area. Similarly, wait times for check-in may be dependant on individual carriers, but the area per passenger at check-in and the ambience is controlled by Dublin Airport.

Further, a means of benchmarking food and retail prices against out-of-town shopping centres should be explored as part of the quality of service indicator to ensure that monopoly prices are not being extracted.

How do you think quality of service might be measured?

The quality of service indicator should be a mix of spatial and service standards and depend broadly on defined measurements such as access to stands, metres squared per passenger, wait times. Some use of passenger perceptions surveys will be necessary, but these should be limited, as they can be costly, and less reliable. 'Mystery shoppers' may be a useful tool. Standards should be set for maximum wait times at security.

The example cited from the Australian Competition and Consumer Commission seems more reliant on perception surveys. However, such surveys can be less reliable than easily quantifiable information.

The consultation document states that Terminal 2 is being built to comply with IATA Standard C with regard to spatial standards in the various airport areas. However, it is not clear what design year is being used, with regard to passenger forecasts. The choice of the standard also has more severe consequences if it is not achieved.

While peak spreading is an efficient use of Dublin Airport, from a business passenger perspective it is important that a choice of carriers and destinations is possible early in the morning and in the evening peak to allow same-day travel. Therefore, efficiency at peak times to increase peak capacity at the airport is vital.

Comparison with other airports internationally would be useful to benchmark the target standards. As customer and consumer demands

change at the airport it may be necessary to review these standards over time.

How should quality of service be treated for the purposes of setting future price caps at Dublin Airport?

What financial incentives, if any, should be in place to influence the delivery of quality of service at Dublin Airport?

A service quality indicator, based on service-level agreements between Dublin Airport and carriers, should be included in the future price cap. In addition, periodic reports of the quality of service results should be published and displayed in a prominent position in the terminal buildings.

So that the quality of service indicator becomes a useful tool in regulating the quality of service in Dublin Airport there should be an agreed level of compensation where service-level agreements are breached. Similarly, there may be rewards where the target standards are surpassed.

Breaches of agreed standards should be a higher percentage of revenue than the surpassing of standards. In order to increase the efficacy of the financial impact it may be that penalties increase where breaches are recorded in successive reporting periods, up to a cap. A similar approach may be taken for rewards.

Further practical issues are a matter for the Regulator, subject to the data being independent, easily measurable, and fully auditable.

How should the Commission address differences of opinion about the appropriate trade-off between the level of airport charges and quality of service at the airport?

Setting suitable caps on the penalties and rewards will go some way to addressing the trade-off between the charges and service quality.

I hope that you find our comments useful. If you have any queries regarding this submission please do not hesitate to contact us.

With best wishes,

Yours sincerely

Eoin Gahan

Head, Regulation, Trade, and Policy Foresight
Forfás
Wilton Park House
Wilton Place
Dublin 2
Ireland

Tel: +353 1 6073239

Mobile: +353 85 72 72 157