

Ms. Catherine Mannion  
Commissioner  
Commission for Aviation regulation  
3rd Floor  
Alexandra House  
Earlsfort Terrace  
Dublin 2

13 September 2018

**Re: Commission Paper 10/2018 30 August 2018, Draft Decision on Summer 2019 Coordination Parameters and Local Guideline 1 at Dublin Airport**

Dear Catherine,

I refer to the above consultation.

Aer Lingus disagrees with the CAR's draft decision with respect to the proposed increases to the Dublin Airport runway coordination parameters for Summer 2019. The CAR's proposals are contrary to the recommendations adopted by the recent Coordination Committee Annual General Meeting ("AGM") and, if adopted, would be the first time that the CAR has chosen to depart from the recommendations of the Coordination Committee.

Dublin Airport is at full capacity during the times that the CAR proposes to increase the coordination parameters. It is wholly inappropriate for the CAR to endorse proposals that would cause further deterioration to already unacceptable levels of flight delays at Dublin Airport. In this regard, the OAG Monthly OTP reports for summer 2018 show a material deterioration in on-time performance at Dublin Airport in summer 2018 relative to summer 2017 compared to other airports.<sup>1</sup>

Aer Lingus strongly advocates increased traffic at Dublin Airport and has ambitious growth plans. However until such time as appropriate infrastructure upgrades and effective runway efficiency gains (i.e. the implementation of reduced arrivals and departures separation, and Nautical Mile separation limits) are in place, increases in runway movements should only happen during the under-utilised periods throughout the day where traffic levels are currently less than the declared capacity.

The Helios modelling which was commissioned by the CAR confirms that peak average runway departing taxi time will increase by a further 1 minute and 40 seconds (in addition to the average increase of 30 seconds observed during summer 2018 according to the CAR's Draft Decision). It

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<sup>1</sup> <https://www.oag.com/june-2017-airports-on-time-performance>  
<https://www.oag.com/july-2017-airports-on-time-performance>  
<https://www.oag.com/aug-2017-airports-on-time-performance>  
<https://www.oag.com/june-2018-airports-on-time-performance>  
<https://www.oag.com/july-2018-airports-on-time-performance>  
<https://www.oag.com/august-2018-airports-on-time-performance>

should be noted that the arrival delays have not been modelled by Helios for the “Alternative 3’ scenario which has been selected by the CAR in the draft decision. Notwithstanding that, it could reasonably be assumed, that in accordance with previous Helios models relating to wishlists, that arrival taxi times will also be subject to increases. Aer Lingus notes that the CAR’s draft decision would permit the addition of just six daily movements (which equates to a 0.6% capacity increase), but will cause a disproportionate increase of 11.1% in peak departing runway taxi time (based on the daa published runway report July 2018).

The proposed increase in taxi times will have a detrimental impact on airlines, passengers and on the airport in general for the reasons set out below. In addition, these factors will have a disproportional impact on airlines such as Aer Lingus which utilise Piers 3 and 4 and the South Apron and which already experience, on average, 30 seconds longer taxi times (when accessing Runway 28) compared to carriers utilising other piers (daa published runway report July 2018).

- Increased delays

The increases in taxi times will harm on-time performance and increase flight delays thereby causing further inconvenience to passengers. Specifically, if the draft decision were to be implemented, and based upon the increase in delays due to longer departing taxi times alone, the aggregate delay caused to passengers departing Dublin Airport during Summer 2019 will be an extra 3.2 million minutes (i.e. 11.1 million estimated summer departing passengers multiplied by 18 seconds average increased delay). Such a profound increase in passenger inconvenience is unacceptable in the context of the proposed increase in runway capacity.

- Flight cancellations

Airlines (including Aer Lingus) which operate to other European airports where strict noise control measures apply (i.e. night curfews) will experience increased risk of flight cancellations. Such airports include Berlin, Dusseldorf, Frankfurt and London Heathrow. In order to facilitate sustainable multiple daily flights to these destinations, the relevant evening flights are scheduled to depart as late as possible from Dublin Airport. This means that the flight arrival and subsequent departure from the destination airport are scheduled to operate as prudently close to the relevant night curfew as possible.

The proposed increase in capacity in the evening hours will therefore increase the risk of cancellations. This will arise due to either i) the flight departing Dublin Airport late and then not being permitted to subsequently depart the destination airport due to the night curfew, or ii) an airline making the decision to cancel the flight before it departs Dublin Airport because it is clear that the subsequent flight cannot depart the destination airport before the night curfew. In both circumstances, and despite best efforts of the airline to mitigate the impact, the result will cause significant inconvenience for passengers booked on the cancelled flights and on flights on the subsequent day which will also be impacted. Such increased delay risk may make popular evening services to such destinations unsustainable reducing customer choice and harming connectivity both at Dublin and for Irish consumers travelling though other hub airports

- Missed flight connections

The proposed increase in capacity in the morning hours and the expected increases in delays for arriving aircraft will inevitably give rise to an increase in missed connections by passengers transferring to North American flights at Dublin Airport. Such missed connections will cause significant disruption and inconvenience for connecting passengers and will have an adverse impact on the development of Dublin Airport as a hub airport in line with Government strategy.

In addition to causing an increase in missed connections at Dublin Airport, the proposed increase in runway capacity will cause an increase in missed connections throughout the extended Aer Lingus partner flight network. Aer Lingus operates a complex and wide ranging network schedule which feeds connecting flows at other hub airports. Any further deterioration to on-time performance at Dublin Airport will jeopardise passengers making connections at other airports. The 1 minute 40 second average peak delay is material in the context of minimum connecting times of between 45 and 120 minutes (depending on the airport/routeing concerned). In this regard, Aer Lingus note that other airlines which operate connecting services also opposed the proposed increases in capacity.

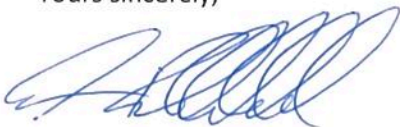
- Cost

Increases in delays, cancellations and taxi times will necessarily increase the airlines operating costs (such as Regulation 261 and maintenance costs) and decrease the effectiveness of an airline's fuel saving efficiency programs. Increased cancellation / delays also cause unquantifiable reputational damage as a carrier's on-time performance is the single most important factor in determining passengers' satisfaction with their travel experiences and the likelihood that the passenger will conduct repeat business with an airline. It is ironic, given that the CAR is the enforcement body for Regulation 261, that it should propose an increase in capacity which will inevitably increase passenger delays and flight cancellations.

For all the reasons set out above, the draft decision in respect of runway coordination parameters should not be implemented and Aer Lingus fully reserves its rights to challenge any such decision.

Aer Lingus supports the proposals in respect of Local Guideline 1 at Dublin Airport. In addition Aer Lingus supports the draft decision in respect of terminal capacity.

Yours sincerely,



Greg Kaldahl,

Chief Strategy & Planning Officer