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Commission for Aviation Regulation  
3<sup>rd</sup> Floor, Alexandra House  
Earlsfort Terrace  
Dublin 2  
DO2 W773  
Ireland

Dear Commissioner,

Thank you for the opportunity to respond to the Draft Decision on the summer 2020 declaration of Coordination Parameters at Dublin Airport. British Airways is opposed to the Draft Decision to increase runway capacity for the summer 2020 season.

***Taxi Out times, Delay Minutes and On Time Performance in Summer 2019***

It is disturbing to see the general acceptance that total delay minutes will increase if there are more movements added (para 3.28). Even if this is shared amongst all departures to potentially give a 'very slight' decrease in delay minutes per departure, the premise that increased delay is acceptable is not reasonable. In the 1400 hour on arrival and the 1800/1900 hours where capacity increases are proposed, British Airways will have to increase block times by five minutes on its flights operating in these hours for S20. This is based on a review of S19 flying and there is a strong concern that taxi times will be further impacted by additional movements at these times, leading to a further increase in blocks in S21.

**Coordination Committee**

The Coordination Committee has a responsibility to review the data and give guidance based on operational experience. Whilst the 10 minute delay may not have been breached it is evident from the data that delay will increase and this is unacceptable to British Airways.

Yours sincerely,



Tracey Buckmaster  
Slot Planning Manager - Heathrow