

To whom it may concern,

In response to the Draft Decision Paper CAR (Commission for Aviation Regulation) released outlining the daa projects, both those that have been sanctioned and those that have been disallowed, we have summarised our views on behalf of British Airways. Detailed commentary is included in the attached spreadsheet referencing the individual projects contained in the 2015-2019 DUB airport development plan. By way of introducing our comments we have summarised our overriding views in this email and we sincerely hope our concerns are explored.

British Airways is an established carrier at DUB airport with 8 daily services from terminal 1. We met with the daa back in March of this year and were excited to learn of the development plans the airport were looking to complete, particularly those targeted at terminal 1. The plans the daa outlined included some quick wins to improve this very tired terminal, most notably the arrivals hall and terminal façade were to be addressed. Disappointingly, both these projects (despite their relatively small budget) have been disallowed. For our arriving customers the first impression they receive of the airport, and therefore of Ireland itself, is a dark, worn-out, dilapidated facility and this very much needs to be addressed. Similarly, upgrading the terminal façade would create a far better first impression for departing customers and, considering the minimal financial cost of this activity, we are very keen for this to project to go ahead. Not addressing these issues in the 2015-2019-development period is not an option – in five years' time terminal 1 will have deteriorated significantly.

One of our gravest concerns regarding the entire 2015-2019-development plan is that the disparity between terminal 1 and terminal 2 is not addressed. Looking at the list of allowed projects the only non-maintenance initiative, relating specifically to terminal, 1 is the upgrade to an automated BRS system. Whilst it is fantastic that this project will be implemented it is extremely disappointing that this is the only initiative that aims to directly improve the journey for customers using terminal 1. Conversely, the list of disallowed projects features a number of terminal 1 specific initiatives (arrivals, security, check-in, and the terminal façade) whereas the only terminal 2 specific project on the disallowed list is the upgrade to HBS standard 3 (a standard that has not been mandated by the DFTAS / IAA). Given that all airlines pay the same per passenger user charge the variance between terminals must be addressed so the customer experience of terminal 1 and 2 is aligned.

One specific project to mention is the upgrade to the transfer facilities at DUB airport. We are in agreement with CAR and are not supportive of the proposed enhancements of this area. The current facility is sufficient and there are a number of other projects that have a greater need of an €18.7m investment.

British Airways is a premium airline and operating from a airbridge gate aligns with our business model. We are very much aware that DUB is a heavily congested airfield and securing an operation from such gates is not always possible and to tackle this, and ensure our customer's needs are met, we would welcome the introduction of an on-pier service target metric. At Heathrow for example a target is agreed with the airport operator and rebates are given to airlines if the target is not met. The suggestion that differential pricing of airbridge / remote stands is not an equally effective way of managing stand usage. This proposal would only hold true if all airlines were equally insensitive to charges - carriers with infinite resources could remain parked on a prime airbridge served stand for excessive periods, and other carriers may be forced onto remote stands.

Whilst our preference is for airbridge served stands we recognise the need for additional airfield capacity. Our preference however is not for additional remote stands that are located a significant distance from the terminal building and would therefore provide a very poor customer offering. This

proposal is flawed as it places the onus on the airlines / GHA to provide the coaching between these new stands and the terminal which is not acceptable. Should the remote stands be built, coaching must be provided by the airport as part of the development plan and not be forced upon the airlines or GHAs, particularly when we do not support the proposal. Our preference instead is to better utilise the stand capacity already available in the 200 pier by segregating arriving and departing passengers. We are disappointed such plans for segregation have not been approved and believe this is a missed opportunity. Segregating this pier would not only improve the customer proposition (customers finding themselves in the wrong gate area currently have to exit the airport and come back through security to regain access airside) but also improve the utilisation of stands adjacent to the terminal, reducing the coaching requirement and minimising the negative environmental impacts associated with this activity.

British Airways very much values the single-till concept and welcomes any initiatives to increase the revenues generated through this means. We would be keen for the daa to critically evaluate its commercial portfolio and present targets to its concessionaires to raise revenue per customer. We understand passenger growth will be the major contributing factor to increasing the revenue pot we would also like to see the daa challenged to reduce its operating costs over the 5-years, and not rely on passenger growth to reduce its operating expenditure per passenger. Given the industry's focus on cost reduction the daa cannot be removed from making the necessary changes to ensure the success of the airport.

We welcome continued dialogue to bridge the gaps between the current proposal and the views of British Airways. Please direct any questions you may have regarding our comments to either myself or Marjorie Briggs, APM DUB.

Yours faithfully,

Anna

Anna Smith
Customer Service Manager – Ireland and London City
07789 614 038

Allowed Projects

Category	Project	€m	British Airways Comments	Priority
Airfield Maintenance	Runway 16/34 Pavement Rehabilitation	21.6	These activities are Paramount for operational safety	Essential
Airfield Maintenance	Apron Rehabilitation	22.3		
Airfield Maintenance	Airfield and Apron Road	1.7		
Airfield Maintenance	Airfield Taxiway Rehabilitation	12.5		
Airfield Maintenance	Overlay Runway 10-28	29.6		
Airfield Maintenance	Airfield Pollution Control	22.5		
Airfield Maintenance	Airfield Lighting Upgrade (Runway 10-28)	8.3		
Airfield Maintenance	Taxiway AGL Upgrade	3.6		
Airfield Maintenance	Airfield Vehicles and Equipment	5.8		
Business Development	Apron Development 5G	16.1	British Airways in part supports this proposal. Due to British Airways' customer base our preference is for jet bridge stands. The proposed option to bus from either end of the terminal to remote stands is a poor customer proposition and not in line with our premium offering. We understand there is a need to increase stand capacity, however, we are not in favour of remote parking that lacks the airport infrastructure to support the operation. Our particular concern with this proposal is that the buses will not be funded by the daa and instead will increase the costs for the airlines (via the GHAs). This is not acceptable.	Some Benefit
Business Development	Bus Lounge Facilities	12.0	The proposed location for the remote stands (Apron Development 5G) is some distance from the central location and the bus journey between the lounge and the remote stands will take some time. The time allocated to the bus operation and the costs of the buses will place pressure on the GHAs and in turn the airlines. The buses should be provided by the daa as part of the remote stand development.	Not required
Business Development	Fixed Electrical Ground Power Terminal 1	1.2	British Airways supports this initiative. This is an important improvement to the environment on stand removes equipment and makes it safer .	Essential
Business Development	Pier 1 Enclosed Gate Rooms	1.6	British airways supports these proposals	Essential
Business Development	Cargo Gate Redevelopment	1.7		
Business Development	Airport Screening Centre	0.9		
Business Development	Consolidated Staff car park	1.7		
IT	IT Technology and Lifecycle Management	15.5	British Airways supports the IT projects and the landside & terminal maintenance as these are integral parts of the airport development	Essential
IT	IT Business Systems Investment	16.1		
IT	Retail IT	1.6		
IT	IT Business Innovation Investment	1.9		
Landside & Terminal Maintenance	Light Fleet	2.5		
Landside & Terminal Maintenance	Car parks Maintenance	2.7		
Landside & Terminal Maintenance	External Roads	2.4		
Landside & Terminal Maintenance	Landside Infrastructure Utilities	5.0		
Landside & Terminal Maintenance	Terminal 1 Roof Repairs/Upgrades	7.8	British Airways supports this project as the roof in Terminal1 is in a very poor and does require attention .	Essential
Landside & Terminal Maintenance	Terminal 1 Baggage Reconciliation System	1.2	British Airways supports this project as an automated baggage system will improve our ability to track baggage and reduce the number of lost and mishandled bags at DUB.	Essential
Landside & Terminal Maintenance	Terminal 1 Critical Equipment Upgrades	8.0	British Airways support this proposal. Of particular concern to British Airways are the lifts in the 300 gates. These are very much in need of an upgrade.	Essential
Landside & Terminal Maintenance	HVAC & BMS Upgrades	4.8	British Airways supports this proposal. The air-conditioning system is in need of an upgrade.	Essential

Commercial Revenues	Retail Refurbishments	17.5	British Airways recognise that a single till regime is very useful to keep airport charges down, however, it is disappointing that daa are not under pressure to critically evaluate their commercial portfolios and present targets to concessionaires to raise revenue per customer. The retail refurbishment work is already in progress.	Some Benefit
Commercial Revenues	Commercial Hanger Infrastructure	0.9		
Commercial Revenues	Cargo Terminal Development	1.7		
Commercial Revenues	Digital Advertising Pods	0.6		
Commercial Revenues	Commercial Property Refurbishments	10.9		
Commercial Revenues	Long Term Car Park Resurface	6.1		
Commercial Revenues	Consolidated Car Rental Centre	7.9		
Commercial Revenues	Completion of Terminal 2 Multi-storey car park	15.8		
Other	Minor Projects	10.8	British Airways supports this proposal. There is a need for money to be available for small adhoc projects as they arise.	Essential
Other	Programme Management	3.1	Unavoidable cost due to implimentation of projects	N/A

Disallowed Projects

Category	Project	€m	Description	British Airways Comments	Priority
Business Development	Airfield Infrastructure for Large Aircraft	1.6	Improved safety of manoeuvring on the airfield for larger aircraft currently operating at Dublin	This project is not currently of concern for British Airways at Dublin as we have no immediate plans to increase aircraft size.	Not required
Business Development	Pier 3 Flexibility	10.5	New airbridges, passenger lounge and revamp and expansion of seating at gates	British Airways supports this proposal and the project is vital. Due to increased traffic this summer and larger aircraft departing from this area it has become very congested and uncomfortable for customers. There is a significant need therefore to improve and expand the seating area. It must be noted however, British Airways does not support the proposal to accommodate the A380 as this would cause undue pressure on other infrastructure, most notably the baggage reclaim and immigration facilities, which are already compromised with the current passenger volumes.	Essential
Business Development	Central Search Area - New Technologies	11.1	LAGs & ETD screening equipment; automatic tray returns (T1, T2 & Transfers)	Given the growth the airport has experienced in the last few years (and continued projected growth) there is some benefit in having the automatic tray return systems and the LAGS and ETD screening	Some benefit
Business Development	T2 Transfer Facility	18.7	Extended Transfer Facility to accommodate transfer pax. growth	British Airways are not supportive of this project and are satisfied with the current transfer facility. The proposed development increases the security lanes to 10 and considering there are currently only 16 for all of T1 the ratio of processing transfer customers to departing customers seems unrealistic.	Not required
Business Development	T1 Arrivals	8.8	Revamp of arrivals to increase natural light and passenger comfort	British Airways is a strong supporter of the proposal to upgrade the arrivals area. It is paramount that investment is made in this area to bring the arrivals facilities in line with terminal 2. The area is very dark and our customers and non Dublin based colleagues describe terminal 1 as the 'old' terminal. It is outrageous that the variance between the two terminals will not be addressed.	Essential
Business Development	T1 Façade	0.5	Clean and declutter external façade	British Airways is a supporter of this proposal. The exterior of the terminal perpetuates the view that the terminal is 'old'. External work is very much required to increase customer perception of DUB airport. Without investment the terminal will remain a tired facility and will continue to decay. The project requires a relatively small financial input and could offer great return on investment.	Essential
Business Development	T2 HBS Standard 3	12.3	Provide regulatory-required screening equipment	British Airways supports the upgrade to HBS standard 3. The proposal is limited to terminal 2 only. In the UK the DFT is mandating 2018 for HBS standard 3 and British Airways would encourage consistency across terminals.	Some benefit
Business Development	Apron 300R	7.5	5 NBE stands close to Pier 3 (restricted aircraft size)	British Airways does not support this proposal the project is too limiting to aircraft type.	Not required
Contingent	Pier 2 Segregation	19.0	Segregate arriving and departing passenger flows	British Airways strongly supports this initiative. The work to make Pier 2 segregated is essential to accommodate the additional traffic at terminal 1. Currently only the first British Airways service can depart from Pier 2 (as there are no arriving customers). Whilst our preference is always for a jetbridge stand, the segregation would enable our later services if necessary to depart from pier 2, providing greater flexibility to the airport.	Essential
Contingent	T1 Check-in and Security	38.1	Move security to Mezzanine level to provide more lanes to meet projected traffic growth to security queue target. Revamping check-in at the same time.	British Airways supports this proposal. The proposed development of the security area would greatly improve the customer perception of DUB airport. The improvements would offer customers additional space for preparation and post security activities. In addition the screening processing time would decrease, improving the queuing time and increasing customer satisfaction. Based on the anticipated passenger growth figures for DUB airport the proposal is essential to accommodate this growth without hampering the customer satisfaction.	Some benefit
Contingent	Line up points to R10-28	27.9	To enhance capacity of R10-28 (2 additional departures in peak departure hour)	British Airways supports this proposal with the importance given to minimizing delays with the increased capacity at peak times.	

