

Mr. John Spicer, Acting Commissioner Commission for Aviation Regulation 3<sup>rd</sup> Floor, Alexandra House, Earlsfort Terrace Dublin 2 Ireland

25th July 2014

Response to Airports Charges Draft Decision Paper

Dear Mr. Spicer,

On behalf of Etihad Airways I would like to comment on your Determination of 29<sup>th</sup> May 2014. As an airline that has operated at Dublin Airport over the last 7 years I would like to say that the developments that we have experienced at the airport over the last number of years have been largely positive. The expansion of the airport in 2010 when the daa opened Terminal 2 was a huge improvement in the standard of service we could deliver to our guests. Coupled with that terminal opening we have continuously added capacity and as recently as the 15<sup>th</sup> July this year we have grown to double daily operations to our fast growing hub in Abu Dhabi.

As the first airline to move into Terminal 2 we have seen developments at that terminal grow to such an extent that we are now experiencing congestion at key times in our operation. Check-in desk availability, gate and stand availability are becoming critical at certain times during the day. These are of serious concern to us as an airline as achieving an on-time performance into our hub is critically important for our network development. Any outbound delays due to airport restrictions and congestion are things we would like to see removed. In that context there are a number of key infrastructural projects we would like to support in the daa's investment programme.

As I have already alluded to we are growing frequency and seeing an increase in the number of guests using our services at Dublin. While most of these guests start and finish their journey at Dublin we are also seeing a rise in the number of guests transferring onto our flights. This is an important element of our business and we support developments at the airport that help this to grow this particular market segment.

In order for Etihad to grow at the airport there are a number of key areas that we are keen to see developments that will help to speed up the movement of guests from check-in to gate as quickly as possible and the efficient, speedy and safe movement of aircraft from gate to air that minimises ground time, reduces taxi-times and fuel burn. Having the right staffing levels and equipment in place to move guests through the airport system are vital to achieving all of these measures. With those in mind there are a number of projects that we see as important and support their implementation at Dublin Airport. Below are some of the projects that we support their implementation:

- The airfield infrastructure upgrades for New Large Aircraft as we operate B777 currently and are considering deploying the new Boeing Dreamliner, the B787, on Dublin in time these additional developments on the taxiways will greatly help efficiencies on the airfield.
- 2. Another runway project that will see additional line-up points on either end of Runway 10-28 will add capacity to the runway system and again improve efficiencies on the airfield.
- 3. Within the terminal area we support the provision of the capex required for
  - T2 Hold Baggage Screening Equipment
  - o The development of the transfer facility in T2,



- Pier 3 Flexibility providing greater widebody capability for the airport for A380 and B787 aircraft
- The provision of screening equipment to meet LAGs and Explosive Trace Detection requirements which will come into force during the determination period.
- o The provision of HBS Standard 3 equipment
- Automatic Tray Return System (ATRS) to maintain and improve current screening rates

Finally we believe that you must ensure that airport security and search is adequately resourced so that daa can continue to guarantee processing of all passengers in a maximum of 30 minutes.

Yours sincerely,

Chris Youlten

Senior Vice-President Airports & Network Operations

Etihad Airways

