

July 8, 2019

Commission for Aviation Regulation
Info@aviationreg.ie

Re: Response to the 2019 Draft Determination CP3/2019

To Whom It May Concern,

American Airlines appreciates the opportunity to respond to the Commission for Aviation Regulation regarding the Draft Determination for Dublin Airport. We provide our feedback on the Draft Determination below.

American recognizes Dublin Airport's considerable passenger growth during the current five year period. DUB has consistently experienced an increase in passenger numbers above annual forecasts, which has contributed to higher than anticipated commercial revenue. We hope this passenger trend continues and that the resulting revenue will be utilized to offset charges.

We support additional capacity and efficient infrastructure programs at DUB while keeping costs affordable. Increased capacity must be based on sound assumptions to result in value and economic benefit for all airport stakeholders. Looking ahead, Dublin's focus on increasing capacity with such projects as the expansion of T2 check-in areas and enlarging the pre-clearance facility is beneficial to multiple airlines.

American appreciates CAR's efforts to benchmark other European airports and utility companies to provide a detailed evaluation and comparison of the processes in effect at these regulated entities. We support IATA's submission to CAR which included detailed evaluation of the financial building blocks and IATA's discussion of the capital projects.

American supports the decision to reduce the passenger price-cap at DUB. In addition we ask that, should CAR's proposed passenger price-cap take effect, and should DUB decide to re-evaluate some of the proposed capital projects, the airlines be included in consultations regarding the possible elimination of projects.

Thank you for your solicitation and consideration of feedback from the airline community during this vital process. We consider DUB an integral part of our international system and as such will continue to participate in the consultation process going forward.

Sincerely,



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cc: Jenny O'Connor, General Manager
Richard Muise, Director Europe & Middle East Operations
Lenore Diamond, Managing Director Airport Affairs

Enclosure: IATA Response to CAR FINAL