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DUBLIN AIRPORT  
“Response to Consultation on Timeline for Coordination Parameters Decisions”  
10 January 2018

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## Executive Summary

Dublin Airport welcomes the opportunity to respond to the Consultation of Timeline for Coordination Parameters Decisions

The Commission for Aviation Regulation (CAR), by virtue of Section 8(1) of the Aviation Regulation Act, 2001, is the competent authority in Ireland for the purposes of Council Regulation (EEC) No.95/93 (as amended) on common rules for the allocation of slots at Community Airports other than the function of the coordinator. Article 6 of the Slot Regulations states that, at a coordinated airport, the member state responsible shall ensure the determination of the parameters for slot allocation twice yearly, while taking account of all relevant technical, operational and environmental constraints as well as any changes thereto.

Dublin Airport has reviewed the proposed timeline for Coordination Parameters Decisions and would suggest some amendments to the proposed timeline. We believe these amendments will benefit the overall process as they will:

- Allow time to develop and agree a number of wishlist scenarios in advance of any modelling work commencing. The wishlist scenarios will reflect market intelligence from airlines regarding their growth plans including preferred slot times to suit their network connectivity and aircraft size and existing levels of slot utilisation and identification of time periods where airlines would experience difficulties obtaining slots;
- Provide performance data including queue times, taxi times and on-time performance for the relevant season;
- Provide updates on infrastructural projects that would be delivered in advance of the season; and
- Provide details on infrastructural projects that would be ongoing during the season and their impact on airport operations.

## Proposed Amendments

We would propose the following changes to the proposed timeline:

	CAR Proposal		daa Proposal		
	Day X	W18	Day X	W18	S19
Final Decision	Day X	10 May	Day X	10 May	27 September
Submissions due on draft Decision	Day X -2 weeks	26 April	Day X -1 weeks	3 May	20 September
Draft Decision	Day X -4 weeks	12 April	Day X -3 weeks	19 April	6 September
Advice from Coordination Committee due	Day X -5 weeks	5 April	Day X -4 weeks	12 April	30 August
Circulate forecast schedule final assessment	Day X -6 weeks	29 March	Day X -5 weeks	5 April	23 August
Submissions due on draft assessment	Day X -7 weeks	22 March	Day X -6 weeks	29 March	16 August
Circulate forecast schedule draft assessment	Day X -8 weeks	15 March	Day X -7 weeks	22 March	9 August
Confirmation of schedule/wishlist to be assessed	Day X -9 weeks	8 March	Day X -11 weeks	22 February	12 July
Airlines to submit wishlists to ACL	Day X -12 weeks	15 Feb	Day X -12 weeks	15 February	5 July

Validation of model in conjunction with stakeholders	Started Day X -15 weeks	Mid Jan	Started Day X -15 weeks	Mid-January	Mid-June
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We would suggest that the amount of time between the submission of the wishlist and the confirmation of the schedule to be assessed should be reduced from three weeks to one week. The wishlist will drive the development of a forecast schedule which is required for all modelling activities and this should be completed at the very start of the process before any modelling commences.

The timelines as proposed allow one week between the confirmation of the schedule/wishlist to be assessed and the circulation of a draft assessment. Our modelling experience would suggest that this period should be extended. We believe four weeks are required to complete a draft assessment. We would highlight the potential for extra complexity with the modelling requirements as some of the PACE taxiway projects will begin during W18 and continue into S19. Sufficient time should be allowed in the programme to assess forecast demand against the operational impact of these projects.

Recognising that our proposed amendments require more time at the initial stages of the process we have suggested elements of the process where time could be sacrificed. We would propose allowing one week following the submissions on the draft decision to make the final decision and that the other dates should move by one week to allow more time for the analysis and modelling phase. We would highlight that there are still two weeks between CAR receiving advice from the Coordination Committee regarding the coordination parameters and the publication of the draft decision.

### Conclusion

CAR will rely on a large body of evidence to reach its final decision for the coordination parameters for W18 including simulation models and operational performance metrics of the airfield, terminals and physical processing capabilities of key processors. Our proposed amendments increase the amount of time available in the process to complete these tasks. These amendments have been proposed based on our experience developing coordination parameter proposals in previous seasons. We believe that it is critical that sufficient time is available to support and complete the modelling and analysis required to validate CAR's final decision.