

12th December 2003

Mr. Cathal Guiomard,
Head of Economic Affairs,
Commission of Aviation Regulation,
Floor 3,
Alexandra House,
Earlsfort Terrace,
Dublin 2

**RE: COMMENTS BY AER LINGUS ON ADDENDUM TO COMMISSION PAPER
(CP4/2003)**

Dear Cathal,

Aer Lingus welcomes the proposed changes to the classifications as set out in the Addendum to Commission Paper CP4/2003 to the extent that these address some of the concerns raised by Aer Lingus in previous submissions. However, Aer Lingus still has a fundamental concern about the basis adopted by the Commission in relation to off-peak landing and take off charges at Dublin Airport.

As previously stated, Aer Lingus has no objection in principle to the introduction of off-peak charges at Dublin Airport. However, Aer Rianta, IATA and ICAO have indicated that they have a preference for MTOW to be used as the basis for off-peak charges and we are unaware of any other airport applying Aircraft Classification Numbers (ACN) as the basis for off-peak charges.

Even if there is some justification for the use of ACN numbers as the basis for off-peak charges (which we remain to be convinced of), this methodology has proven extremely complicated to administer. On the part of Aer Rianta, the introduction of the current scheme (which provided for five categories and a rate per tonne pricing mechanism) has been arduous, complicated and expensive. It will place even more pressure on Aer Rianta's ability to invoice correctly now that eight categories are proposed.

On the part of Aer Lingus, there have also been and continue to be significant difficulties in authorising the relevant invoices for payment. This currently has to be done manually. Aer Lingus will incur considerable expense and require substantial IT investment to facilitate automatic invoice verification for what is a non-industry standard methodology of off-peak charges.

In addition, the revised classifications are based on a complicated exercise to establish the ACN as a function of the current aircraft weight, tyre pressure and landing gear. We are concerned that it will not be possible to ensure that the classifications are kept current without the Commission being involved in an ongoing reassessment.

In view of the above, we would again urge the Commission to reconsider its decision to base off-peak charges on ACN numbers rather than MTOW.

Yours sincerely,

Niall Walsh
Procurement Director