

Dublin Airport Airline Operator's Committee

Mr. Cathal Guiomard,
Head of Economic Affairs,
Commission for Aviation Regulation,
Earlsfort Terrace,
Dublin 2.

28-11-03

Dear Mr. Guiomard,

With reference to your intention to review the determination of 26 August 2001 on the Maximum Levels of Airport Charges levied at Dublin, Shannon and Cork airports. The Dublin Airport AOC would like you to take into consideration the charging mechanism in connection with aircraft parking and airbridge use.

Currently, parking fees and airbridge charges are calculated from the landed time to the airborne time minus 15 minutes for taxiing. The minimum charging basis is per 30 minutes or part thereof.

In reality this means that an operator is paying for parking and airbridge use while in transit to and from the runway, except where the 15-minute rule applies. This rule only applies if the 15 minutes do not run over the first 15 minutes of a 30-minute unit, as there is no mechanism to calculate a fraction the minimum charging basis.

It also means that an operator who cannot be accommodated on his pre-assigned stand and is required to hold for a stand, will pay additional parking and airbridge charges through no fault of his own, also, the occupier of the stand and the aircraft holding are both paying for the use of the same facilities concurrently.

The AOC would like you to consider a mechanism whereby these charges only apply while the aircraft is parked on the stand allocated to it for the purpose of aircraft turnaround.

Yours sincerely,

Dympna Dwyer

Chairman.

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