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Dear Mr Guiomard

ACL RESPONSE TO COMMISSION PAPER CP3/2001

Re: Consideration of the Full Coordination of Dublin Airport

Airport Coordimation Limited (ACL) was appointed as the Coordinator of Dublin Airport on 10th October 2000 by the Department of Public Enterprise (DPE) to facilitate the operations of carriers serving the airport.

ACL has extensive experience in coordinating airports in the UK and elsewhere and is therefore well placed to comment on the questions raised in the Commission's Consultation paper.

The structure of this response is in two sections.

Firstly, ACL will comment briefly on the SH & E report and the conclusions it draws from its analysis. Secondly, ACL will comment, with supporting evidence, on its own effectiveness in achieving the objective of voluntary schedule facilitation at Dublin Airport since its appointment in October 2000.

Section 1

The SH & E Report

The Commission invited respondents to comment on the 'The assumptions, conclusions, analysis and factual basis' of the SH & E report.

ACL has carefully considered the SH & E report, and its underlying analysis, and broadly supports the majority of its conclusions.
The conclusions are, however, based on the assumption that traffic growth rates will 'slow markedly' to an 'average annual growth of around 5%'.

If this assumption underestimates the growth rates then SH & E's conclusions about when the facilities will become congested, and when full coordination may become necessary, will have to be revised.

The CAR must determine the reliability of this assumption.

There are a number of points in the report that ACL would like to emphasise:

1. Management of Non-Airline Traffic

In ACL's experience, as Coordinators of a number of other airports, the prioritisation of different types of traffic is essential prior to any attempt to introduce full coordination.

Lower priority traffic should be efficiently managed away from peak hours before airline traffic is forced to make scheduling adjustments.

The IATA Worldwide Scheduling Guidelines, make it clear that non-airline traffic should be given lower priority than airline traffic and, where necessary, should be constrained from operating in peak hours where this adds to congestion and delays to airline traffic.

The Commission is seeking views in its consultation as to whether Dublin should be designated as Fully Coordinated under Article 3.4 of the EU Regulation 95/93. Article 8.1.(b) of the same Regulation makes it clear that preference must be given to airline traffic over non-airline traffic.

2. Control of 'Unannounced Traffic'

ACL supports the SH & E recommendation that Aer Rianta would be justified in making the need to advise the Coordinator, in advance, of planned operations to/from Dublin Airport an absolute condition of the right to operate at Dublin.

In order to give effect to this rule Aer Rianta would need appropriate powers to deal with operators who breached such a condition.

ACL believes that this should help to avoid the problems caused by 'unannounced operations' (except in emergency situations) experienced in previous years.

3. 'Best Practices' in the Use of Runways

In ACL's view, there are opportunities to enhance the capacity of Dublin's runways, which are the primary constraint on activity, through investment in appropriate infrastructure and through improving the efficiency of ATC process and procedures.

ACL's experience at other UK airports suggests that, particularly in peak hours, it should be possible to increase the declared capacity above the current 40 movements per hour, without a significant increase in delays.

The IATA Worldwide Scheduling Guidelines state clearly only 'If there is no possibility of resolving the problems (of capacity) in the short term, either through the removal of capacity constraints or by voluntary adjustment of airline schedules, the airport concerned should be designated as Fully Coordinated. It is imperative that every opportunity is explored to avoid this situation.'

Whether the runway improvements can be implemented at a pace which enables Dublin runway capacity to meet the growth in demand is difficult to predict.

Chart 1 includes runway capacity "profiles" (capacity is varied by hour to meet short peaks in demand) of a number of UK and German airports showing the declared capacity on a single runway (note Heathrow has 2 runways dedicated to either arrivals or departures).

4. **Stands and Terminals**

ACL broadly agrees with the SH & E conclusions that there should be sufficient stands overall to accommodate demand if they are efficiently managed and if the remote stands are also used.

The Terminal development problems should be comparatively short lived and must be managed by Aer Rianta and the airlines to minimise the impact on the travelling public during Summer 2001.

Section 2

Effectiveness of the Facilitation Process

The SH & E report and conclusions make it quite clear that there should be sufficient runway capacity to accommodate airline demand so long as certain conditions, outlined in the report, are met. One of those conditions is that the airlines co-operate voluntarily with schedule adjustments proposed by the appointed Coordinator.

Since ACL's appointment as Coordinator, it has received extensive co-operation in discharging its responsibilities from all the carriers serving Dublin. However a small, but influential minority, are not prepared to fully co-operate with the voluntary schedule adjustments that ACL has requested on some flights.

This means that, in some 15-minute time periods, the schedule does not fit within the declared runway capacity for Summer 2001.

Of particular concern has been the refusal of some airlines to co-operate with some significant schedule adjustments requested to spread demand in the early morning departure peak.

The congestion in these hours, if not relieved by schedule adjustments, can cause reactionary aircraft delays that ripple throughout the whole day, causing widespread disruption to passengers.

ACL has made it very clear to all the airlines serving Dublin Airport that the failure of the system of 'self management' may result in the authorities declaring Dublin as Fully Coordinated.

ACL continues to work with all the carriers serving Dublin Airport to try and achieve their co-operation.

Chart 2 shows the number of schedule adjustments requested by ACL during initial coordination of Summer 2001 in November 2000. Total requests were for 122,218 movements for the Summer season.

As the chart illustrates, more than 91% of flights were either confirmed as requested or a voluntary adjustment of no more than 5 minutes was requested.

Very few flights, mainly new flights trying to operate in the most congested periods, were asked to make significant schedule adjustments.

A small number of flights proposed by 'paper airlines' were offered no slots at all when requesting flights in the peak hours.

ACL was relatively effective at this stage in the scheduling process in persuading carriers to adjust their schedules to meet capacity constraints.

As the scheduling process evolved, flights were added, cancelled and changed by the airlines.

On balance more flights were deleted than added in Summer 2001. Therefore, ACL proposed to airlines that they could operate at their originally requested times, where these times were still required by the airline.

Chart 3 shows the current situation for Summer 2001 and outlines the number of schedule adjustments requested by ACL from the carriers in Summer 2001 at various stages in the coordination process (Initial Coordination, After the Slot Return Deadline, At the Start of the Season and the Current situation).

Around the Slot Return Deadline at the end of January 2001, as the data shows, a small number of airlines were refusing to co-operate with the voluntary schedule adjustments requested by ACL. In some cases this was in the expectation that schedule changes by other carriers might make their schedule adjustments requested by ACL unnecessary.

Around 4,320 (3.6%) flights had refused the adjustments requested by ACL and were planned to operate at their required time at this stage in the scheduling process.

As the scheduling process continued, the total number of movements planned at Dublin Airport declined from 117,957 to 113,302.

By the start of the season significant numbers of these cancellations were in peak hours ACL advised a number of carriers that the schedule adjustments that it had previously requested were no longer required.

At the start of the season around 2,103 (1.9%) movements had not been adjusted by carriers despite requests by ACL.

As the season has progressed the airlines have requested a large number of further changes to their schedules and ACL has requested further voluntary adjustments. Significant numbers of these requests have been rejected by a small number of airlines resulting in around 4% of total slots refusing to reschedule in the peak hours and causing a breach of the declared capacity limits.

These breaches are shown in the following charts.

- Chart 4 shows the breaches of the 15-minute constraint for arrivals.

- Chart 5 shows the breaches of the 15-minute constraint for departures.

- Chart 6 shows the breaches of the 15-minute constraint for Total Movements.

All other declared capacity limits have been met during the coordination process.

Conclusion

ACL does not take a view on whether Dublin Airport should become Fully Coordinated but would point out to the Commission that the peak periods, though intense, are short lived and for the majority of the day Dublin Airport operates below its declared capacity.

An effective process of runway capapcity manegement and enhancement , with the "profiling" of declared capacity to meet peak demand may delay the need to introduce Full Coordination because of runway constraints.

ACL supports the SH & E proposal that there should be a thorough review, in June of each year, of the success of the process of voluntary schedule adjustments, of the forecast of demand for the following summer season and of the likelihood of runway capacity increases becoming available in time for the coming summer season.
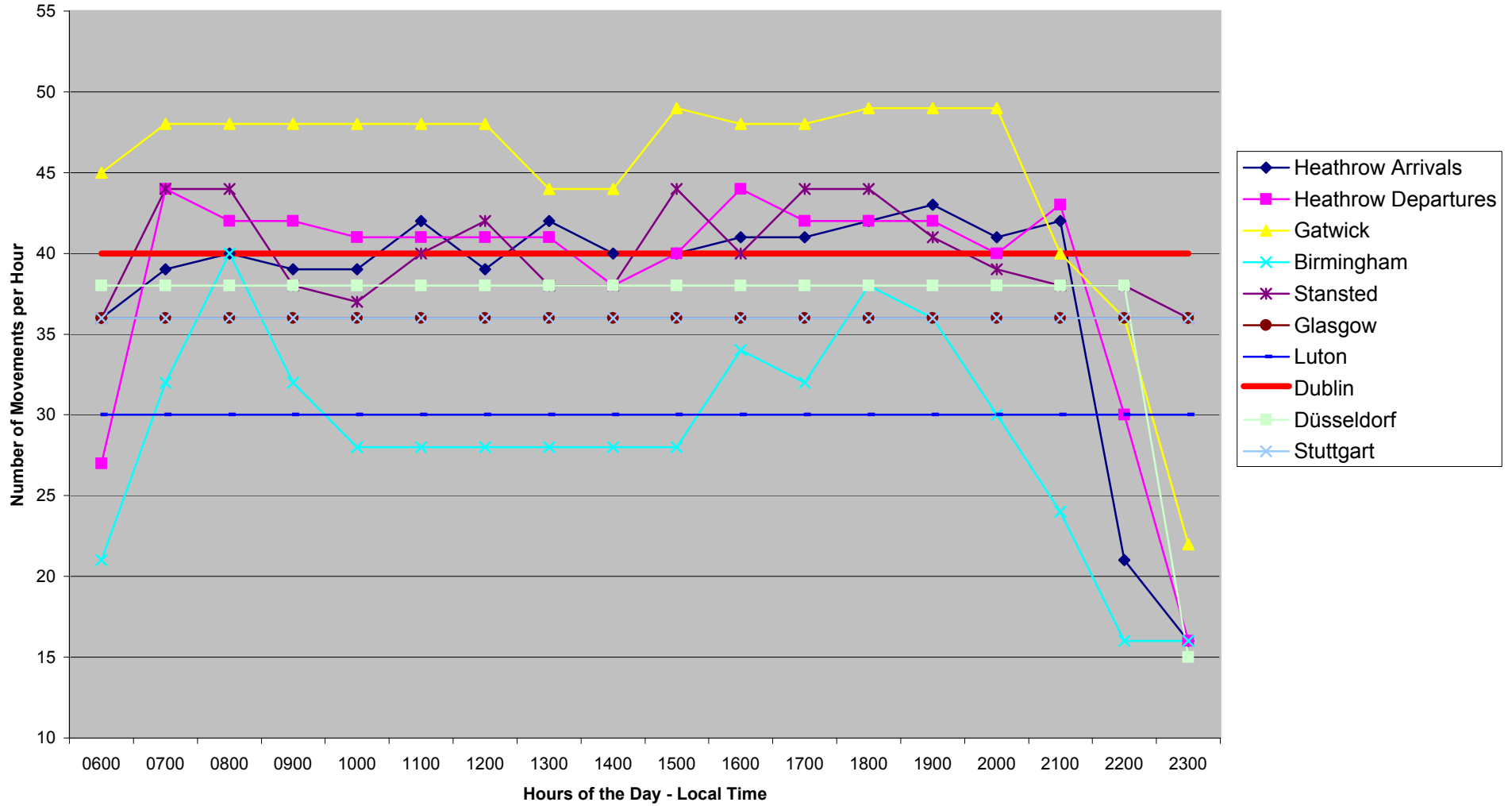
**Runway Capacity Profiles
Single Runways**

Legend:
- Heathrow Arrivals
- Heathrow Departures
- Gatwick
- Birmingham
- Stansted
- Glasgow
- Luton
- Dublin
- Düsseldorf
- Stuttgart

Y-axis: Number of Movements per Hour

X-axis: Hours of the Day - Local Time

Chart 1

Schedule Adjustments Requested at Initial Coordination

Size of schedule adjustments requested (Minutes)

Percentage of Total Schedules

- 86.2% — Confirmed as Requested
- 5.1% — 5 min
- 2.2% — 10 min
- 1.7% — 15 min
- 2.6% — 20-30 min
- 1.1% — 35-60 min
- 1.0% — >60 min
- 0.2% — No Slot
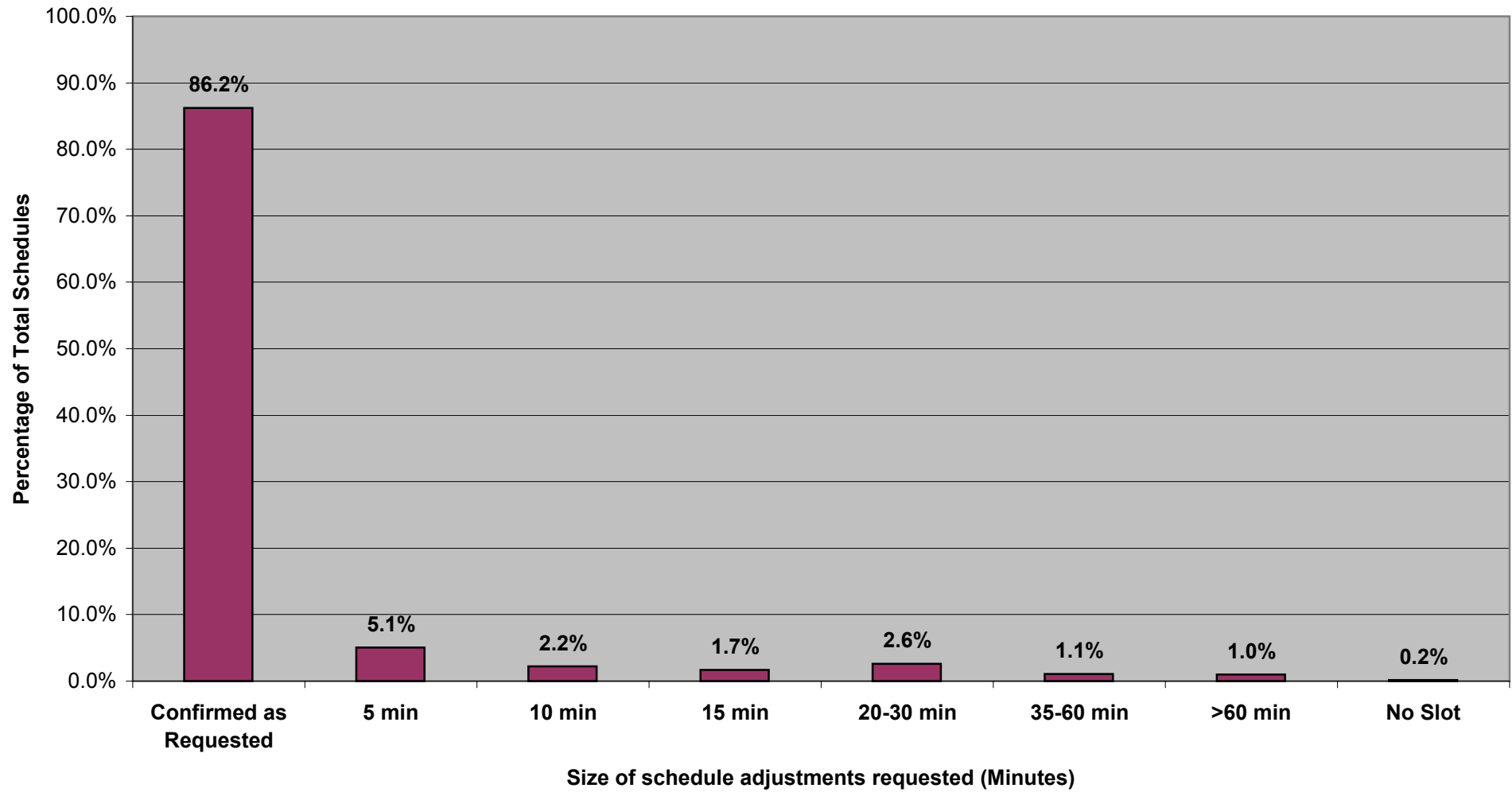
Chart 2

Schedule Adjustments at Key Points in the Scheduling Process
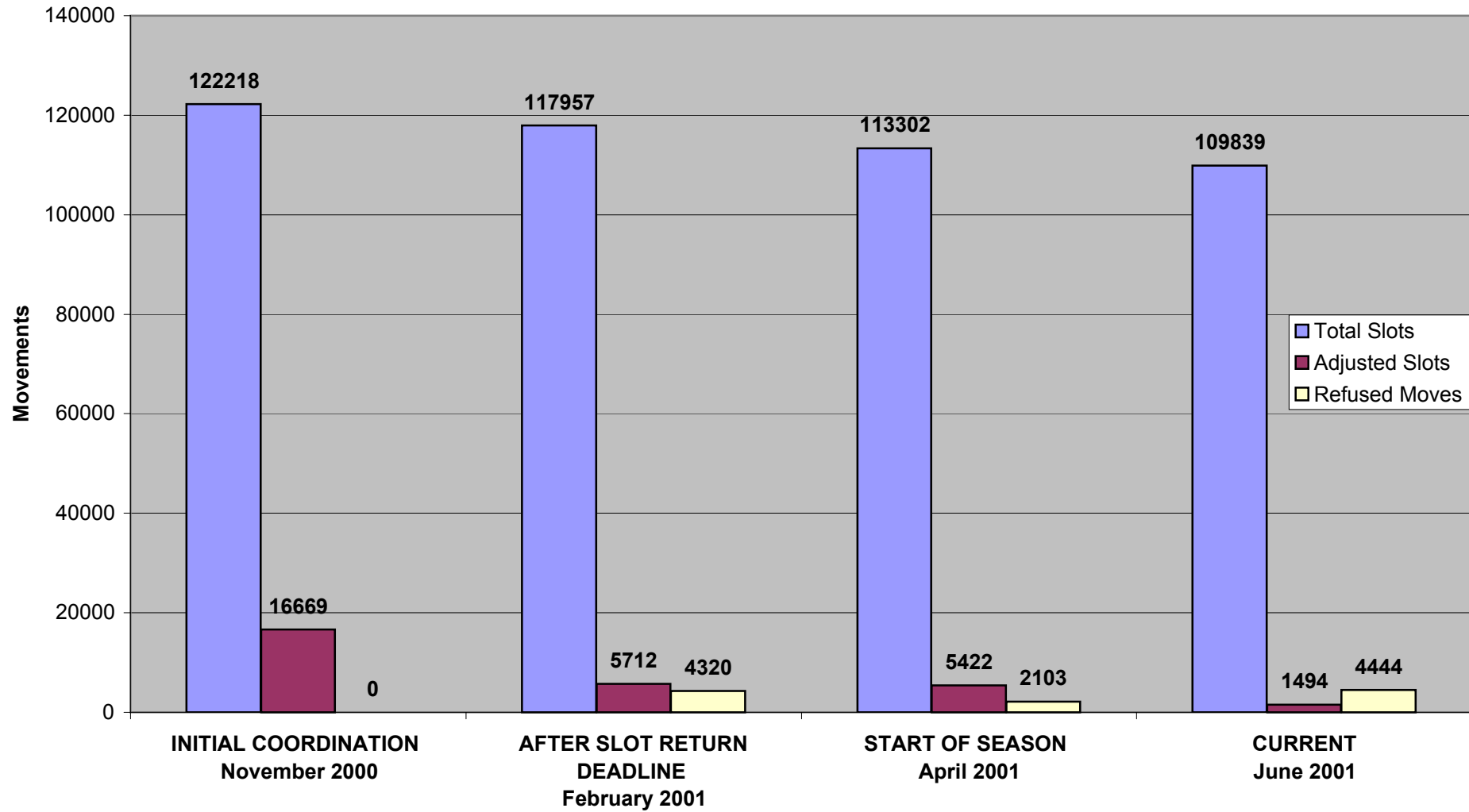
Chart 3

RUNWAY 15 MINUTES
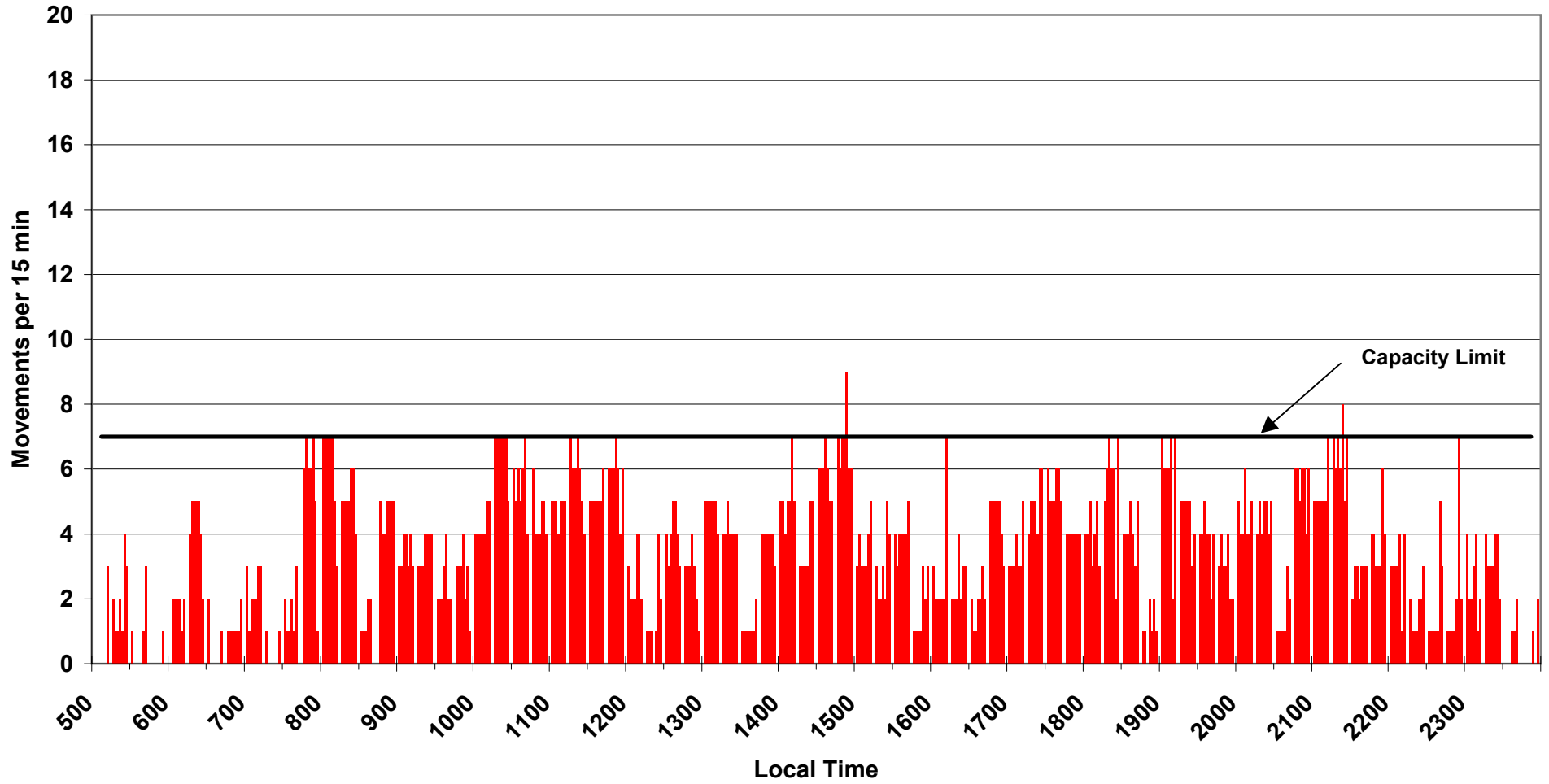**Arrivals - Coordinated**

Chart 4

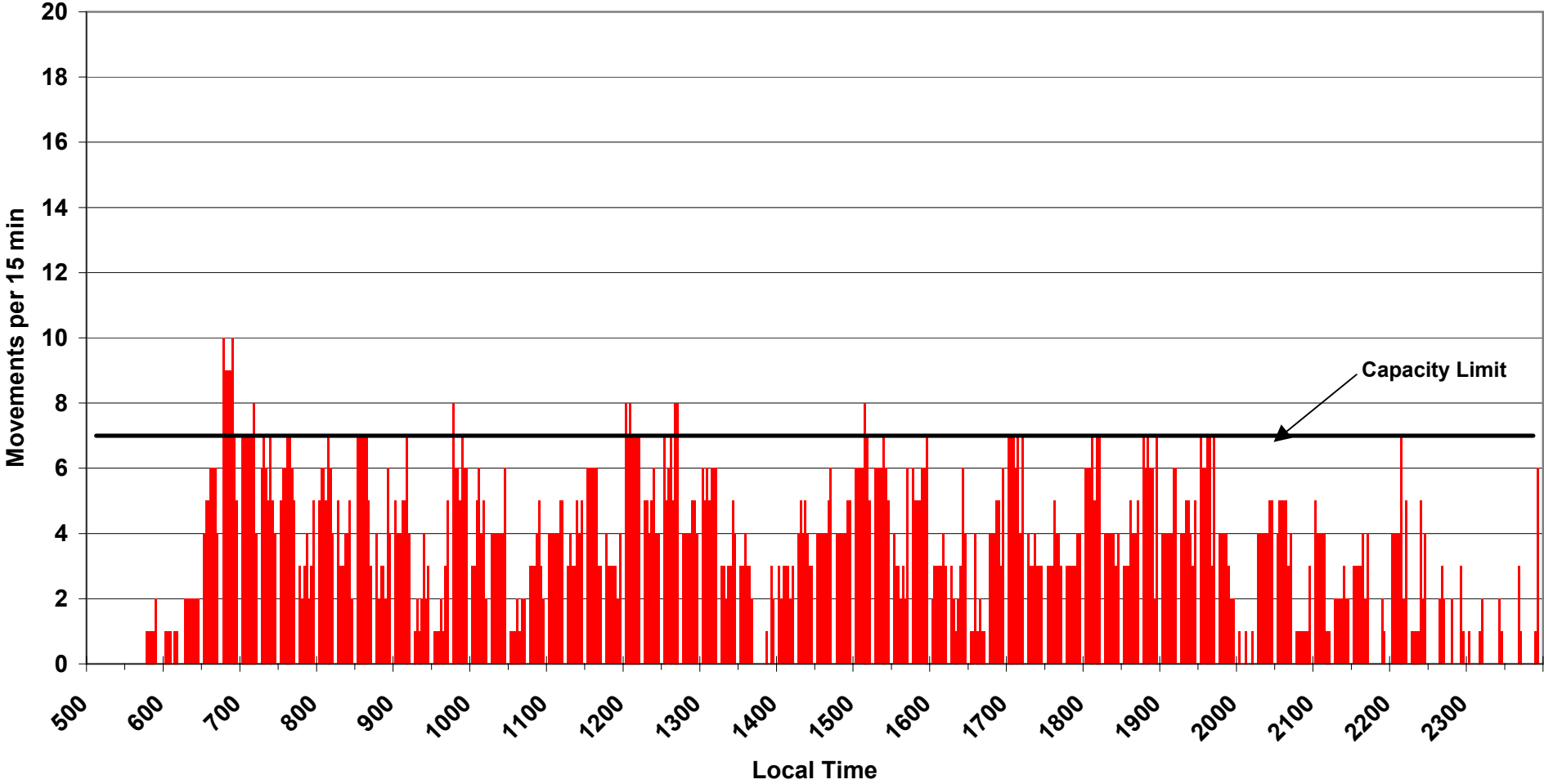# RUNWAY 15 MINUTES
Departures - Coordinated

Chart 5

RUNWAY 15 MINUTES
Total Movements - Coordinated

Chart 6