

Cathy Mannion
Commission for Aviation Regulation
3rd Floor Alexandra House
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Dublin 2
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18 September 2019

RE: Commission Paper 6/2019, 04 September 2019, Draft Decision on Summer 2020
Coordination Parameters at Dublin Airport

Dear Cathy,

Aer Lingus welcomes the opportunity to respond to the Draft Decision on summer 2020
Coordination Parameters at Dublin Airport issued by CAR on 04 September.

While Aer Lingus is supportive in principle of increased capacity being declared at
Dublin Airport, this support is dependent upon appropriate infrastructure being in place.
Aer Lingus therefore opposes the Draft Decision which increases Dublin Airport runway
coordination parameters for the upcoming summer 2020 season. The draft decision 1)
is in complete contradiction to the recommendations of the Dublin Airport Coordination
Committee including the views of the IAA; 2) fails to recognise the evidential material
which demonstrates the likely performance degradation at Dublin Airport; and 3) is
based on inappropriate application of IATA world slot guideline that capacity analysis
should assume airport facilities are being managed efficiently.

Coordination committee

The committee recommendation was to oppose the proposed capacity increase and this
was based on a practically unanimous voting outcome reflecting the serious concerns of
stakeholders with the proposed increase. This outcome it should be noted is against a
backdrop of airlines that are actively seeking to grow their operations at Dublin Airport.
Aer Lingus therefore is very concerned that CAR has unilaterally decided to ignore the
guidance of the Coordination Committee. This is a particularly unwelcome development
which undermines the rationale for the committee's existence.

Evidential material

Dublin Airport is full during the times that CAR proposes to increase the coordination
parameters. It is inappropriate for CAR to endorse proposals that would add capacity

that causes further deterioration to already unacceptable levels of flight disruption at Dublin Airport. Aer Lingus requests that CAR provide further consideration to the following statistical issues that provide clear justification for airlines to express opposition to the capacity increases proposed in the draft determination. These include:

- Over one third of departing flights in S19 operate with a delay¹
- Average taxi time for departures have increased by 13% over last three years²
- Increased slots, according to ARUP indicates that that the taxi time for departing aircraft in the 1400-1500 period will increase by 17%³
- Helios model is incorrectly based upon the assumption that slots are moved around within the existing summer 2019 limits to satisfy the wish list demand in summer 2020 - Airport Coordination Limited (ACL) themselves have confirmed to Aer Lingus that there is zero capacity in the baseline on many of the days where those changes were simulated in the model

Airport Infrastructure:

Aer Lingus notes section 3.39 of the draft decision, that *"In assessing the capacity of airport infrastructure, it is necessary to examine the capacity of that infrastructure when it is operated efficiently. The decision should not take account of inefficient practices which can be changed but which may be constraining the use of the infrastructure. Nor should it take account of factors largely unrelated to the infrastructure in question, such as delay caused by en-route air traffic control or rotational delay. To do so would require making assumptions which would artificially constrain the achievable capacity of the airport. The IATA World Slot Guidelines state that when assessing the capacity of airport facilities, "the analysis should assume that the airport facilities are being managed efficiently and are fully staffed."*

The current IATA World Slot Guidelines (WSG) is the 10th Edition which was issued in August 2019. The above reference attributed to the IATA WSG last appeared in section 6.1.2 in edition 8 of the WSG. The relevant Section 6.1.2 was subsequently amended in the 9th Edition which was issued in January 2019 to delete the line quoted above. Aer Lingus notes that the guidelines for capacity assessment no longer provides for an assumption of efficient management of airport facilities. The following extracts highlight that the current WSG does in fact require capacity analysis to take into consideration capacity limits of infrastructure.

"6.1.2 The analysis should objectively consider the ability of the airport infrastructure to accommodate demand at applicable service levels, such as queue times, levels of congestion, and delay, while taking into account relevant airspace limitations set by local ATC authorities. This analysis should provide all relevant capacity limits of the runway(s), apron, terminal(s), and other airport facilities as deemed necessary.

6.1.3 The analysis should determine any infrastructure, operational, or environmental constraints that prevent demand being satisfied. The airport managing body should

evaluate options in consultation with responsible parties for overcoming such shortages through infrastructure, operational, or policy changes and improvements, in accordance with the respective legal framework, where applicable “

Aer Lingus believe that the provisions of the WSG 10th Edition sections 6.1.2 and 6.1.3 are clear in that any capacity analysis is objective in considering the ability of airport infrastructure and determines any infrastructure, operational, or environmental constraints that prevent demand being satisfied.

Aer Lingus is not of the view that Dublin Airport infrastructure is being used as efficiently as possible nor is there any concrete evidence that Dublin Airport is pro-actively taking the necessary steps to achieve optimal efficiency.

Such appropriate steps have been outlined by Aer Lingus previously in correspondence to daa on 21st December 2018 as part of CIP consultation which CAR was copied and to our response to CAR on the Draft Determination on 8th July 2019.

In order to support the growth at Dublin Airport, Aer Lingus outlined its views on certain assumptions which need to be addressed which include:

- That Dublin Airport implements appropriate operational resilience protocols
- That Dublin Airport ensures appropriate availability of stands during the construction phase to support growth
- That Dublin Airport adopts new stand allocation guidelines that facilitate connecting traffic growth
- That Dublin Airport introduce enhanced stand management procedures
- That Dublin Airport ensures appropriate availability of capacity in the morning peak to be used to facilitate US connecting traffic
- That Dublin Airport ensures that sufficient operating slots are available to support growth
- That Dublin Airport implements improved airfield efficiencies
- That Dublin Airport implements improved operational procedures to increase stand utilisation”

These assumptions have to be considered in their totality given their interdependence. Increasing slots without addressing stand resilience, management procedures, airfield efficiencies or stand planning guidelines will only serve to exacerbate an already very challenging operating environment. It is only through a focussed and integrated approach to the assumptions outlined, can Airlines have confidence in the ability of the Airport to handle any increase in slots without resulting in a material deterioration in operational performance.

In addition, Aer Lingus also noted in our response to the Draft Determination that in order to ensure the effectiveness of hub infrastructure, there is a requirement for

changes to Stand Allocation Guidelines at Dublin Airport in order to support efficient use of the hub infrastructure. We also advised that consideration should be given to mandating Dublin Airport to reflect hub prioritisation within the Stand Allocation Guidelines in order to bring about the most efficient use of the additional facilities to be provided in the next regulatory period and supporting National Aviation Policy. Aer Lingus suggested that this proposed review should replace the existing review of Stand Allocation Guidelines currently being undertaken by Jacobs on behalf of Dublin Airport.

In addition and in contrast to other coordinated airports there is still no full time expert stand planning unit at Dublin Airport dedicated to optimising stand efficiency.

The above issues highlight the significant risk to any decisions based on an assumption of efficient use of infrastructure at Dublin Airport which is the case for the various models that Helios, NATS and Arup present to the coordination committee.

For the reasons outlined above, Aer Lingus believes that there exists a compelling rationale for CAR to review its draft decision and reject the proposal to increase the Dublin Airport runway coordination parameters for summer 2020.

Separately Aer Lingus confirms that it is supportive of the draft decision in respect of terminal capacity.

Aer Lingus remain available should you require any further information on this response.

Yours sincerely,



Reid Moody

Chief Strategy and Planning Officer

¹daa presentation at 2019 AGM to Coordination Committee

²Dublin Airport Runway Performance Reports

³daa commissioned ARUP simulation modelling for summer 2020 airfield capacity