



IATA's Response to Consultation on Revising the Slot Sanction Scheme Implementation Guidelines for Dublin Airport

The International Air Transport Association (IATA), an association representing over 270 airlines and 84% of global commercial air traffic, appreciates the opportunity provided to respond to the proposed revision of the Slot Sanction Scheme implementation guidelines for Dublin Airport (DUB). IATA's comments and concerns relate to the Consultation on Revising the Slot Sanction Guidelines, June 2017.

These comments are focused on the second proposed bullet point of the consultation, *'the removal of the six month element from the definition of 'repeatedly', thereby allowing behavior in previous seasons to be considered when assessing the appropriate treatment of an incident of slot misuse.'*

Q.1 Do you agree or disagree with these proposed changes? Why?

IATA disagrees with the proposal to remove the six month element from the definition of 'repeatedly'.

IATA welcomes scheme revisions that promote the fair and appropriate consideration of a regular airline operation. This is best achieved through the consideration of performance trends of current operations, where flights are subject to limited variations to the planning and operational environment they operate within. The virtue of a performance investigation is disproportional to the timeline beyond that of the existing season or series of slots, due to the availability of information and the inconsistencies in both planning and operational determinants.

Extending trend timelines of investigation beyond six months risks the introduction of broader performance determinants, reducing the resemblance between flights.

Availability of Information

IATA acknowledges and supports the scheme's requirement for the equitable investigation of poor performance, including the request for information and/or an explanation from the air carrier. The quality of the information that is provided to the coordinator is of paramount importance, however it should be recognized that the availability of quality information deteriorates over time. Logged delay codes provide information, but not to the level that explains the nature of all circumstances on the day of operation, that may be recalled within a shorter time frame.

Factors that affect the resemblance of flights over time

Factors influencing the resemblance of flights over time may be considered as planning or operational.

Planning factors that impact performance include;

- Changes to an airline's fleet and network.
- Planned route alterations with respect to airspace developments and restrictions.
- Changes to airport infrastructure, at either end of a route, which may impact the levels of service experienced by the airline and therefore create delay.



- Changes to an airport's declared capacities, at either end of a route, which may impact levels of congestion and create delay.
- Planned policy or regulatory changes.

Operational factors that impact performance include;

- Unplanned route alterations with respect to air space restrictions and congestion.
- Meteorological changes such as wind strengths, in particular where these occur outside of seasonal regularity.
- Changes to the airport operational environment, at either end of the route, including the impact of other aircraft operators, changes to regular schedules and the efficiency of ground handling and Air Traffic Control.
- Unforeseen airline or airport technical issues.
- Unplanned policy or regulatory changes.

The list of factors that affect the ability to accurately compare flights within a trend are more extensive than listed here and become more diverse as the timeline is extended, therefore we support the six month element remaining.