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27 September 2024

**Ref: Draft Decision on Summer 2025 Coordination Parameters at Dublin Airport  
(the 'Draft S25 Decision')**

Dear Adrian,

I refer to the above consultation.

Concerning the non-PATM-related coordination parameters referred to in point (iii), Iberia Express supports the hourly runway and terminal limits as set out in the S25 Draft Decision.

However, Iberia Express does not support the approach taken by the IAA in respect of the 32mppa Conditions in the Draft S25 Decision.

Specifically, Iberia Express does not agree with the IAA's conclusion that the 32mppa Conditions are matters which the IAA is required to take account of in declaring capacity for the S25 Season, especially given there are ongoing legal proceedings to confirm that they should not be considered.

Furthermore, Iberia Express disagrees with the IAA's conclusion that "historic slots" can be withdrawn, especially in the light of the CAR specifically expressing support for the practice of trading slots for monetary consideration, and even providing a form to facilitate such exchanges<sup>1</sup>.

In addition, and entirely without prejudice to these views, Iberia Express also takes issue with the IAA's proposals about the practical implementation of such a cap. If a PATM were to be implemented, it must be done on a last-in-first-out basis (LIFO) given that, carriers who brought forward historic slots from S23 into S24, are not responsible for the projected exceedance<sup>2</sup> of the 32mppa cap in the calendar year 2024. Moreover, Iberia Express proposes that any reductions should only take place after the Historic baseline Date (HBD) to allow for normal slot churn.

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<sup>1</sup> [https://www.iaa.ie/docs/default-source/car-documents/slots/notice-on-secondary-slot-trading-and-series.pdf?Status=Master&sfvrsn=50a514f3\\_0](https://www.iaa.ie/docs/default-source/car-documents/slots/notice-on-secondary-slot-trading-and-series.pdf?Status=Master&sfvrsn=50a514f3_0)

<sup>2</sup> <https://www.daa.ie/daa-warns-that-dublin-airport-32-million-passenger-cap-will-be-exceeded-in-2024/>

Furthermore, carriers should also be entitled to return slots/PATM under provision 8.7.2.2 of the WASG. This is a ready-made solution that may reduce the impact on carriers being forced to reduce their PATM for S25 which would allow carriers to voluntarily return periods of up to 5 weeks without impacting their historic precedence provided that the total number of cancellations does not exceed 20% (or another number deemed appropriate) between the first and last date of the slot series.

In any event, given that there are number of questions that have been put before the Courts and which are key to the decision to be made by the IAA in relation to the 32mppa Conditions, it would not be appropriate for the IAA to take account of these conditions in making the Final S25 Decision. Doing so would prejudice the outcome of the challenges to the W24 Decision and would, in addition, lead to inevitable further challenges to the Final S25 Decision, with all the cost and uncertainty that would follow. Therefore, any implementation of a PATM should be deferred until the issues surrounding the same are clarified by the Courts.

Your sincerely,

A handwritten signature in dark ink, appearing to be 'Carlos Lence Juliá', written in a cursive style.

Carlos Lence Juliá  
Manager Scheduling and Slots