Adrian Corcoran Director of Economic Regulation, Consumer Affairs and Licensing Irish Aviation Authority The Times Building 11-12, D'Olier Street Dublin 2

09th September 2024

Re: Coordination Parameters for Summer 25 Declaration

Dear Adrian,

The Irish Aviation Authority, by virtue of Section 8(1) of the Aviation Regulation Act, 2001 (as amended) is the competent authority in Ireland for the purposes of Council Regulation (EEC) No. 95/93 (as amended) on common rules for the allocation of slots at Community Airports (the **"EU Slot Regulations"**), other than the function of the coordinator. Article 6 of the EU Slot Regulations states that, at a coordinated airport, the Member State responsible shall ensure the determination of the parameters for slot allocation twice yearly, while taking account of all relevant technical, operational, and environmental constraints as well as any changes thereto.

Article 5 of the EU Slot Regulations sets out the tasks of the Coordination Committee which include, *inter alia*, making proposals concerning or advising the Member State on:

- the possibilities for increasing the capacity of the coordinated airport determined in accordance with Article 3 or for improving its usage.
- the coordination parameters to be determined in accordance with Article 6; and
- all questions relating to the capacity of the coordinated airport.

The Dublin Airport Coordination Committee meeting took place on Tuesday the 27th of August 2024, via Microsoft Teams and in person, to discuss the Summer 25 Coordination Parameters, and in this regard, I am writing to you in my role as secretary of the Coordination Committee.

The coordination committee voted on 3 topics: Runway Parameters; Terminal and Referral Parameters; and a PATM limit With regard to the PATM seat limit vote, it is important to note that a clear and overwhelming majority of the members of the coordination committee did not believe it appropriate for the committee to consider a PATM limit for S25 in the context of ongoing litigation regarding the W24 PATM limit (and likely litigation relating to any S25 limit) where the IAA's statutory power to set a seat cap is a fundamental question to be answered, or agree with a vote taking place regarding any PATM seat limit. The questions for vote as proposed by DAA, and subsequently amended on foot of intervention by IAA, were not deemed appropriate for consideration and/or vote by the committee. Voting on the questions 1 and 2 put forward by DAA to the members of the Coordination Committee for vote was carried out under protest by the two largest airlines at Dublin airport, as made clear by the communications of 30 August accompanying their votes.

The first vote, on Runway parameters, considered capacity increases based on the Wishlist outlined in the CCM pre-meet on the 08thAugust and an additional Wishlist request which Ryanair states was sent on time but was not adequately captured at the meeting. Members were asked to vote electronically on their preference by hour and by wishlist scenario.

There were 2 Wishlist scenarios for the members to vote on.

Wishlist 1 – Additional movements in 0800 (50 total), 0900 (54 total), 1100 (54 total), 1200 (54 total), 1300 (56 total), 1400 (49 total), 1800 (46 total), 1900 (46 total) and 2000 (46 total). All times are UTC.

Wishlist 2 - Additional movements in 0600 (54 total), 0700 (50 total), 0800 (51 total), 1000 (55 total), 1100 (55 total), 1200 (52 total), 1500 (51 total), 1800 (53 total), 1900 (46 total) and 2000 (41 total). All times are UTC.The results of the votes are presented below.

Hour	2023 Oper	ations
пош	Majority Vote	% of Vote
06:00	Wishlist 2	56%
07:00	Wishlist 1	47%
08:00	Wishlist 2	55%
09:00	Wishlist 1	82%
10:00	Wishlist 2	54%
11:00	Wishlist 2	54%
12:00	Wishlist 1	49%
13:00	Wishlist 1	91%
15:00	Wishlist 1	47%
18:00	Wishlist 1	47%
19:00	Wishlist 1	47%
20:00	Wishlist 1	91%

While the Wishlist 1 was the preference for the majority of the hours, Wishlist 2 was the preference in 0600, 0800, 1000, and 1100. The resulting capacity is presented below.

Time UTC	Arr	Dep	Total	Preferred Scenario
00:00:00	23	25	32	
01:00:00	23	25	32	
02:00:00	23	25	32	No Chango
03:00:00	23	25	32	No Change
04:00:00	23	25	32	
05:00:00	23	36	40	
06:00:00	20	40	54	Wishlist 2
07:00:00	25	25	45	Wishlist 1
08:00:00	29	25	51	Wishlist 2
09:00:00	27	30	54	Wishlist 1
10:00:00	29	29	55	Wishlist 2
11:00:00	30	30	55	Wishlist 2
12:00:00	28	29	54	Wishlist 1
13:00:00	28	30	56	Wishlist 1
14:00:00	23	29	49	No Change
15:00:00	26	27	47	Wishlist 1
16:00:00	27	29	52	No Change
17:00:00	26	28	51	No Change
18:00:00	23	26	46	No Change
19:00:00	26	22	46	Wishlist 1
20:00:00	27	22	46	Wishlist 1
21:00:00	33	25	44	Wishlist 1
22:00:00	28	25	32	No Change

23:00:00	23	25	32	
Totals	616	657	1069	

The second Vote for consideration by the Committee was for Departures and Arrivals Hourly limits and Referral Parameters. The majority of members voted to retain the S24 Terminal Hourly Limits and Referral Parameters in S25. Ryanair, as The largest operator at Terminal 1 expressed that they were not in favour of retaining the Summer'24 terminal capacity parameters for Summer'25 due to the lack of sufficient evidence to support the daa's claim the flown load at terminal 1 is 95%.

Vote	Retain S24 Departures and Arrivals Hourly Limits	Retain S24 Referral parameters
Yes	48.3%	48.1%
No	47.5%	46.6%
Abstain	4.3%	5.3%
Result	48.3% Agree	48.1% Agree

The final vote before the committee related to a continuation of the IAA's W24 PATM limit, as set out in the IAA's Final Decision of Winter 2024 Coordination Parameters at Dublin Airport, into the S25 season. Below I outline the discussions held to date regarding an S25 PATM limit.

- The S25 Coordination Committee Pre-meet took place on the 08th August in Dublin airport and online. A roll-forward to S25 of the IAA's seasonal PATM seat cap set out in the IAA's Final Decision of Winter 2024 Coordination Parameters at Dublin Airport was presented by daa.
- A further EGM of the Coordination Committee was held on the 22nd of August in response to a letter from the IAA dated 14th August where the IAA's view was noted that a seasonal seat cap coordination parameter of 25.2m seats "may be insufficient to re-allocate all historic slots series from Summer 2024, implying a reduction in historic slots to be allocated for S25".

The IAA asked that the committee "as part of its discussions and advice…consider and advise the IAA on how it believes such a reduction (if it were to be adopted) might optimally be implemented in practice, in terms, for example, of:

- how it should be split across air carriers; and
- the allocation/non-allocation in respect of historic slot series of individual air carriers,

as well as any other considerations which the Coordination Committee thinks should be taken into account to ensure that any such reduction would be optimally implemented".

The meeting of 22nd August was attended, Ryanair notes, by Mott MacDonald, at daa's request. Aer Lingus notes that Mott MacDonald had been appointed by the Chair. Aer Lingus notes that some members subsequently objected at the S25 AGM to the appointment of Mott MacDonald without prior consultation with members. daa notes that (1) the Chair wrote to the Coordination Committee on the 16th of August to inform them of the IAA letter of the 14th of August and proposed that Mott MacDonald facilitate the meeting; (2) No objections to that proposal were received before or during the meeting of the 22nd of August.

- At both the Pre-meet on 8th August and EGM on 22nd August, Ryanair notes that the overwhelming majority of Airlines expressed strong views that a PATM should not be considered or discussed by the Committee.
- On 26th August, daa circulated to the committee a meeting pack for the S25 AGM on 27th August. The IAA was copied on that communication. Slide 15 of daa's slides presented five questions for voting by the Committee on Vote 2, regarding an S25 PATM limit. The outcome of the first question would decide if questions 2 to 5 would then be considered for a vote by the committee.
- The IAA subsequently emailed daa on 26th August stating that "it would be helpful to the IAA, and benefit its decision-making, if the Committee and its members were to engage with questions 2-5 with whatever responses" and "even if the majority vote on question 2 is "no", the votes and views of all Coordination Committee members on this question, and questions 3 5, would be useful, as they would provide a full picture of each member's position in relation to the PATM parameter that has been under discussion within the Committee, and also provide potentially valuable perspectives for consideration generally by the IAA in its decision-making." IAA's email was forwarded to the committee by daa. daa proposed, in light of IAA's email, that the committee discuss the IAA suggestion to amend the order of the questions on slide 15 of daa's slides so that questions 2 5 of daa's original slide 15 be presented for voting.
- The S25 AGM took place on the 27th August to discuss the capacity parameters in S25. Ultimately original Questions 1-5 (as circulated on 26th August) regarding an S25 PATM limit were discussed by the committee. During the discussion at the AGM, Aer Lingus notes that a number of airlines (including Aer Lingus, Ryanair and Emerald) expressed the view that no PATM related questions should be put to a vote given the ongoing legal proceedings and that they did not believe that there was any legal basis for the withdrawal of historic slots. Aer Lingus notes that some airlines stated their preference that only Question 2 should be asked, while others were in favour of remaining with the proposal to answer Question 1 first. Ryanair notes that there was no agreement on the proper questions to be posed given the overwhelming majority of members did not agree with the PATM limit being considered by the committee at all. Whilst no formal vote on the Question 2. The majority did not support voting on questions 3 to 5, therefore, questions 3-5 were removed from the electronic vote template.
- Following the AGM, and, Ryanair states, despite no agreement on the proper questions to be posed (if any), questions 1 and 2 were sent forward unilaterally by (in Ryanair's view) daa for a formal vote in order to formally record the views of the Committee. daa's position is that the questions were sent forward by the Chair.
- Questions 1 and 2 (which Ryanair notes were not agreed by the Committee) are as follows:

Question 1 - Should the Committee vote on questions 2 - 5 as requested by the IAA in its letter of 14 August 2024, noting that the IAA confirmed that this consideration

could be separate and without prejudice to members' views as regards whether any reduction in historic slots can, or ought to be, implemented for S25?

Question 2 - Should the IAA declare a PATM seat limit for S25 based on the principles in the W24 decision?

Question 1 is essentially a screening question that Ryanair states aims to reflect that airline members overwhelmingly disagree with the PATM seat limit being considered by the Coordination Committee given the ongoing litigation where the IAA's statutory power to set a seat cap is a fundamental question to be answered.

The results of the Committee voting are presented below:

Vote	Question 1	Question 2		
Yes	40	40		
No	926	928		
Abstain	34	32		
Total	1000	1000		
Result	93% Disagree	93% Disagree		

Ryanair states that it is therefore clear that the Coordination Committee considers it inappropriate to consider the application by IAA of a PATM seat cap in any circumstances and is not in a position to provide any "advice" in this respect.

Please do not hesitate to contact me should you require any additional information regarding the Coordination Committee process.

Yours Sincerely,

Leon Ronan

Leon Ronan, Dublin Airport Secretary to the Coordination Committee

S25 Voting Results

Vote 1 – Runway Parameters

Code	Airline	0600	0700	0800	0900	1000	1100	1200	1300	1500	1800	1900	2000
FR	Ryanair	Wishlist 2	Wishlist 2	Wishlist 2	Wishlist 1	Wishlist 2	Wishlist 2	Wishlist 2	Wishlist 1	Wishlist 2	Wishlist 2	Wishlist 2	Wishlist 1
EI	Aer Lingus	Wishlist 1											
AF	Air France	Retain S24											
AA	American Airlines	Wishlist 1											
BA	British Airways	Wishlist 1											
CJ	BACF	Wishlist 1											
DL	Delta Air Lines	Wishlist 2	Wishlist 2	Wishlist 2	Wishlist 1	Wishlist 2	Wishlist 2	Wishlist 1	Wishlist 1	Wishlist 2	Wishlist 2	Wishlist 2	Wishlist 1
D0	DHL	Wishlist 2	Wishlist 2	Wishlist 2	Wishlist 1	Wishlist 2	Wishlist 2	Wishlist 1	Wishlist 1	Wishlist 2	Wishlist 2	Wishlist 2	Wishlist 1
EK	Emirates	Retain S24											
FX	Fedex	Wishlist 2	Abstain	Wishlist 2	Wishlist 2	Abstain	Wishlist 1						
AY	Finnair	Retain S24	Wishlist 2	Wishlist 2	Wishlist 1	Retain S24	Wishlist 1	Retain S24	Retain S24	Retain S24	Wishlist 2	Wishlist 2	Retain S24
LH	Lufthansa	Wishlist 1											
LX	Swiss	Wishlist 1											
KL	KLM	Retain S24											
LG	Luxair	Abstain	Abstain	Abstain	Abstain	Abstain	Abstain	Wishlist 1	Wishlist 1	Wishlist 2	Wishlist 2	Abstain	Abstain
D8	Norwegian	Wishlist 2											
QR	Qatar Airways	Wishlist 2	Wishlist 1	Wishlist 1	Wishlist 2	Abstain	Abstain	Abstain					
SK	SAS	Wishlist 2											
5X	UPS	Wishlist 2											
ТОМ	TUI	Wishlist 2	Abstain	Abstain	Abstain	Abstain	Wishlist 1	Wishlist 1	Abstain	Abstain	Wishlist 1	Wishlist 1	Wishlist 1
UA	United Airlines	Retain S24											
VY	Vueling	Wishlist 1											
EA	Emerald Airlines	Wishlist 2	Wishlist 1	Wishlist 2	Wishlist 2	Wishlist 2	Wishlist 2	Wishlist 1					
12	Iberia	Wishlist 1											
AIRNAV	AIRNAV	Abstain											
DAA	DAA	Wishlist 1											

Retain S24 Departures and Arrivals hourly limits by Terminal						
Airline	Answer	Yes	No	Abstain		
Ryanair	No	0	428	0		
Aer Lingus	Yes	263	0	0		
Air France	Yes	10	0	0		
American Airlines	Abstain	0	0	8		
British Airways	Yes	18	0	0		
BACF	Yes	15	0	0		
Delta Air Lines	Yes	9	0	0		
DHL	Yes	0	0	0		
Emirates	Yes	6	0	0		
Finnair	No	0	3	0		
Lufthansa	No	0	19	0		
Swiss	No	0	8	0		
KLM	Yes	14	0	0		
Luxair	Abstain	0	0	2		
Norwegian	No	0	1	0		
Qatar Airways	No	0	6	0		
SAS	No	0	9	0		
UPS	Abstain	0	0	7		
TUI	Abstain	0	0	5		
United Airlines	Yes	9	0	0		
Vueling	Yes	6	0	0		
Iberia	Yes	4	0	0		
Emerald Airlines	Yes	88	0	0		
AIRNAV	Abstain	0	0	20		
DAA	Yes	40	0	0		
	Total	483	475	43		
	Total	48.3%	47.5%	4.3%		

Vote 2 – Terminal Hourly Limits and Referral Parameters

Airline	Answer	Yes	No	Abstain
Ryanair	No	0	428	0
Aer Lingus	Yes	263	0	0
Air France	No	0	10	0
American Airlines	Abstain	0	0	8
British Airways	Yes	18	0	0
BACF	Yes	15	0	0
Delta Air Lines	Yes	9	0	0
DHL	Yes	0	0	0
Emirates	Yes	6	0	0
Finnair	No	0	3	0
Lufthansa	Yes	19	0	0
Swiss	Yes	8	0	0
KLM	No	0	14	0
Luxair	Abstain	0	0	2
Norwegian	No	0	1	0
Qatar Airways	Abstain	0	0	6
SAS	No	0	9	0
UPS	Abstain	0	0	7
TUI	Abstain	0	0	5
United Airlines	Yes	9	0	0
Vueling	Yes	6	0	0
Iberia	Abstain	0	0	4
Emerald Airlines	Yes	88	0	0
AIRNAV	Abstain	0	0	20
DAA	Yes	40	0	0
	Total	481	466	53
	Total	48.1%	46.6%	5.3%

Vote 3 – PATM

Should the Committee vote on questions 2 – 5 as requested by the IAA in its letter of 14 August 2024, noting that the IAA confirmed that this consideration could be separate and without prejudice to members' views as regards whether any reduction in historic slots can, or ought to be, implemented for S25?

Airline	Answer	Yes	No	Abstain
Ryanair	No	0	435	0
Aer Lingus	No	0	267	0
Air France	No	0	10	0
American Airlines	No	0	9	0
British Airways	No	0	19	0
Delta Air Lines	No	0	9	0
DHL	Yes	0	0	0
Emirates	No	0	7	0
Finnair	No	0	3	0
Lufthansa	No	0	20	0
Swiss	No	0	8	0
KLM	No	0	14	0
Luxair	Abstain	0	0	2
Norwegian	No	0	1	0
Qatar Airways	No	0	6	0
SAS	No	0	10	0
UPS	Abstain	0	0	7
ти	Abstain	0	0	5
United Airlines	No	0	9	0
Vueling	No	0	6	0
Iberia	No	0	90	0
Emerald Airlines	No	0	4	0
AIRNAV	Abstain	0	0	20
DAA	Yes	40	0	0
	Total	40	926	34
		4%	93%	3%

Comments provided in text box adjacent to vote:

United Airlines believes the PATM cap is unlawful.

Emerald Airlines reject any proposal to remove historic slots from carriers.

JetBlue agrees with positions expressed by EI and FR in that until judicial review is completed the Committee should not opine on these issues.

Comments received via e-mail / letter:

Aer Lingus: We are voting 'no' to the first question on the basis, that as set out above, no PATM questions should have been presented. Our responses are without prejudice to our position that no such question should have been presented.

Ryanair: Our vote is submitted under protest, and we wish to confer no legitimacy on the IAA's request for input on an unlawful seat cap in Summer '25.

Airline	Answer	Yes	No	Abstain
Ryanair	No	0	438	0
Aer Lingus	No	0	268	0
Air France	No	0	10	0
American Airlines	No	0	9	0
British Airways	No	0	19	0
Delta Air Lines	No	0	9	0
DHL	Yes	0	0	0
Emirates	No	0	7	0
Finnair	No	0	3	0
Lufthansa	No	0	20	0
Swiss	No	0	8	0
KLM	No	0	15	0
Luxair	No	0	2	0
Norwegian	No	0	1	0
Qatar Airways	No	0	6	0
SAS	No	0	10	0
UPS	Abstain	0	0	7
ти	Abstain	0	0	5
United Airlines	No	0	9	0
Iberia	No	0	90	0
Emerald Airlines	No	0	4	0
AIRNAV	Abstain	0	0	20
DAA	Yes	40	0	0
	Total	40	926	34
	Total	4%	93%	3%

Comments provided in text box adjacent to vote:

United Airlines believes the PATM cap is unlawful.

Vueling: This question is only relevant if Q1 passes. Based on the CC discussion last Tuesday, we do not believe Q1 will pass as the Chairman acknowledged

Emirates: We would not support a seat limit for S25 as this would be regressive for growth, On the other hand, DUB airport should find ways and means of augmenting the services provided to airlines.

Luxair: It takes flexibility in swapping aircraft capacity.

Comments received via e-mail / letter:

Aer Lingus: We are also voting 'no' to the second question on the basis that no PATM should or can be declared by the IAA, but our vote on question 2 is without prejudice to our position that no PATM questions should have been presented.

Ryanair: Our position on Vote 2 as circulated by daa simply reflects our repeatedly expressed view that IAA has no legal power to apply a seat cap as a coordination parameter for Summer '25 (nor did it have the power for Winter '24).

Schedule of Correspondence exchanged during and post the Summer 2025 Coordination Committee Consultation Process

- 1. Letter from the IAA to the Chairperson of the Coordination Committee dated 21 May 2024
- 2. Email from the Secretary of the Coordination Committee to the Coordination Committee dated 29 May 2024
- 3. Letter from the IAA to the Chairperson of the Coordination Committee dated 14 August 2024
- 4. Email from the Chair of the Coordination Committee to the Coordination Committee dated 16 August 2024
- 5. Letter from Ryanair to the IAA dated 20 August 2024
- 6. Letter from the IAA to Ryanair dated 21 August 2024
- Letter from the Chairperson of the Coordination Committee to the IAA dated 22 August 2024
- Letter from Ryanair to the IAA and the Chairperson of the Coordination Committee dated 23 August 2024
- 9. Email from the Secretary of the Coordination Committee to the Coordination Committee dated 26 August 2024 (attaching AGM materials)
- 10. Email from the IAA to Chairperson and Secretary of the Coordination Committee dated 26 August 2024
- 11. Email from the Secretary of the Coordination Committee to the Coordination Committee dated 27 August 2024
- 12. Email from the Secretary of the Coordination Committee to the Coordination Committee dated 28 August 2024 (attaching electronic vote)
- 13. Email from Secretary to Coordination Committee dated 29 August 2024
- 14. Letter from Aer Lingus to the Secretary of the Coordination Committee dated 30 August 2024
- 15. Letter from Ryanair to the Chairperson of the Coordination Committee dated 30 August 2024
- 16. Email from the Secretary of the Coordination Committee to the Coordination Committee dated 04 September 2024
- 17. Email from the Secretary of the Coordination Committee to the Coordination Committee dated 04 September 2024
- 18. Email from the Secretary of the Coordination Committee to the Coordination Committee dated 05 September 2024
- 19. Email from the Secretary of the Coordination Committee to Ryanair and Coordination Committee dated 05 September 2024
- 20. Email from the Secretary of the Coordination Committee to IAA dated 05 September 2024
- 21. Email from the Secretary of the Coordination Committee to IAA dated 05 September 2024
- 22. Email from the Secretary of the Coordination Committee to IAA dated 06 September 2024
- 23. Email from the Secretary of the Coordination Committee to Ryanair dated 06 September 2024
- 24. Email from the Secretary of the Coordination Committee to IAA dated 06 September 2024
- 25. Email from the Secretary of the Coordination Committee to IAA dated 09September 2024

- 26. Email from the Chair of the Coordination Committee to the IAA dated 09 September 20204
- 27. Email from the IAA to the Chair of the Coordination Committee dated 09 September 20204
- 28. Email from daa to the IAA dated 09 September 2024

END