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Subject: Comments and Questions on the Irish Stakeholder Consultation

Dear Mr. Manning, Dear Mr. Delaney,

Response to Consultation on 2025 Actual Air Navigation Services Costs and 2027 Unit Rates

Thank you for the consultation and the supporting material provided by the IAA, AirNav Ireland and MET ASD.
Having reviewed the documentation, we would appreciate clarification on the following points:

Drivers of the Difference between Determined and Actual Costs

While traffic levels in 2025 appear broadly aligned with the assumptions underlying the RP4 Performance Plan, actual costs were significantly below determined costs. Could the IAA provide an assessment of the key structural drivers behind this variance and indicate whether any lessons can be drawn for future cost forecasting and planning assumptions?

Assessment of the Staffing Incentive Mechanism

The ATCO and ATSEP staffing incentive schemes were introduced as part of the revised RP4 Performance Plan. Following the first year of implementation, could the IAA provide an assessment of the effectiveness of these mechanisms and indicate whether any lessons learned have emerged regarding their future application?

Delivery of Investments and Expected User Benefits

The consultation notes a CAPEX underspend in 2025. Could AirNav Ireland provide further information on which investment programmes were affected, whether any operational benefits have been deferred as a result, and how airspace users are expected to benefit from the associated cost reductions in future years?

Delivery of Investments and Expected User Benefits

AirNav Ireland highlighted several organizational initiatives, including the Enterprise Project Management Office, Change Management Cell and Digital Transformation Office. Could AirNav Ireland provide further information on the expected efficiency, performance or service-quality improvements arising from these initiatives and how their success will be measured during the remainder of RP4?

We thank the IAA for the open and constructive consultation process and look forward to receiving further clarification on the above points.

Yours sincerely,
SWISS International Air Lines Ltd.

N. Ammann

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