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Ref: Commission Paper 4/2022 - Draft Decision on Summer 2023 Coordination Parameters at Dublin Airport (the 'Draft Decision')

Dear Adrian,

I refer to the Commission paper mentioned above.

In this consultation response we deal with two separate issues. The first is our disagreement with certain slot coordination parameters being increased for Summer 2023 ('S23'), and the second issue is in respect of night hours runway capacity.

Summer 2023 coordination parameters

At the Dublin Airport Coordination Committee (the 'CC') meeting on 26 August 2022, the Committee discussed various proposed wishlists pertaining to runway coordination parameters for S23. We note that S23 is very much a landmark season for Dublin Airport and indeed the country, as it sees the new North Runway forming part of the capacity declaration for the first time. However, we do have serious concerns that the releasing of extra capacity as proposed in Commission's Draft Decision at Dublin Airport has the potential to significantly undermine hub operations for Aer Lingus and its customers. These concerns relate to:

- An inadequate level of stands to enable more based (or overnight) aircraft across the campus;
- The CBP facility being full at particular times of the day and unable to accommodate more flights under the current parking/on-stand requirements;
- Dublin Airport's capability to handle significantly more passengers at the central search facility, particularly for first-wave departures; and
- Stand Allocation Rules that require revision to support customers making connections at Dublin Airport.

While the opening of the North Runway is very welcome, it is now clear that the lack of key and critical supporting infrastructure is preventing an efficient operation at Dublin Airport. This is critical to restore confidence in the public's perception of aviation as the recovery from the pandemic continues. The results from both Egis (on behalf of the

Commission) and ARUP (on behalf of daa) regarding the impact on runway hold time and delay of the various proposed wishlists indicate that the bottleneck relating to capacity at Dublin Airport has firmly shifted from inadequate runway capacity to a chronic shortage of suitable aircraft parking stands.

We believe it is incongruous for the Commission to compartmentalise the different components of infrastructure as it has done in the Draft Decision. Aer Lingus believes that the capacity must be looked at in the round as an airport slot (as defined in the Slot Regulation (Council Regulation (EEC) No. 95/93)) includes “the full range of airport infrastructure necessary to operate an air service at a coordinated airport” not just the runway. As stand infrastructure will be the overwhelming constraint at the airport, it seems odd to Aer Lingus that the Commission’s primary concern for the S23 declaration is only to examine runway capability and not to examine the disconnect between the different pieces of core infrastructure required to avail of the airport’s true operational capability. Specifically, daa’s own projection of stand demand for S23 presents an alarming picture for a based operator such as Aer Lingus in a number of distinct areas.

Firstly, in relation to stand demand in advance of the key first wave morning departure bank, daa are projecting that there will be zero availability across the apron for any more aircraft to be handled. This demand includes the late-night arriving European traffic from the base carriers and other short-haul operators that park overnight, as well as the key early morning inter-continental arrivals (that enable hub connectivity) just prior to the first wave European departure bank. At the CC pre-meet on 08 August, Aer Lingus expressed its concern with the robustness of Dublin Airport’s stand demand projections for S23 and asked whether daa was taking into account requirements such as allowing time for departing aircraft to push back and move away from the gate and towing to/from the gate. We also questioned the inclusion of West Apron stands for passenger flights when it is extremely difficult to mount a passenger operation in that location. At the subsequent CC meeting on 26 August, daa acknowledged those concerns and presented a fresh demand projection showing the gravity of the situation for passenger airlines and effectively a “full house” at the airport. It is therefore most concerning that any new departure slots in the morning wave would be added without this infrastructural gap being addressed as it is unclear where these aircraft would park.

Moreover, the addition of extra departure slots in the early morning wave will result in potentially 1,500 extra passengers being required to go through the central search facilities at terminals 1 and 2 combined. Even at the present time in late September with the peak summer season starting to taper off, security is still being supported by a daa management task force daily. With daa being unable to demonstrate that they have the capability to handle the peak Summer 2022 (‘S22’) volumes, it appears an act of folly to present them with a significantly larger task in S23. We note also that Aer Lingus is not alone in its concerns about the release of extra morning slots with two-thirds of the airlines present at the CC meeting voting against the release of capacity presumably for the reasons we have outlined.

Secondly in relation to stand demand, the revised stand projections (following a request by Aer Lingus at the CC pre-meet on 08 August) presented by daa show an airport that is effectively operating in two distinct and very different paradigms from mid-morning to mid-afternoon. At times, Pier 3 and Pier 4 ('P3' and 'P4' respectively) are showing 100% occupancy, and for the most part in excess of 90%. This planning assumes 100% on-time performance from all carriers in the relevant areas. If just one flight is delayed every day, then the ripple effect will extend to multiple flights as aircraft have to hold in the taxiways waiting for stands to clear. This will be compounded in that those holding aircraft will have passengers on board who are using the Dublin hub to connect on to other flights which in turn will have to be delayed to avoid mis-connects. Furthermore, this will also lead to rolling delays on late afternoon and evening short-haul services. There are almost daily examples in the current S22 season of Aer Lingus arriving traffic being required to hold for stands despite being on time in the key connecting time period because one or more aircraft are delayed on P3 or P4.

In contrast, the stand demand projection at Pier 1 and Pier 2 ('P1' and 'P2' respectively) in the same time period is estimated to be in the region of 50% with ample buffers in the system for flights to be delayed and no knock-on impact. The differences between P3 and P4 demand could not be more stark. Therefore, whilst on the face of it, extra runway slots can be accommodated on the campus in the middle of the day both in terms of macro stand availability and tolerable taxi times to and from the runways, it is strikingly evident that a rebalance of the allocation of those stands is critical.

Aer Lingus as a hub operator at Dublin Airport requires that its fleet are parked in close proximity to each other for the hub to function. The resultant minimum connection times (MCTs) enable the hub to function efficiently and drive more traffic through the airport adding value to the economy and stimulating sustainable employment growth. Already MCTs at Dublin Airport exceed those at competitor airports in Europe. For example, at Frankfurt (FRA) the MCT is 45 minutes whereas at Amsterdam (AMS) it is 50 minutes for non-Schengen and 40 minutes for Schengen flights. At Paris (CDG) and Lisbon (LIS), it is 60 minutes for the base operators. At Dublin, the MCTs are 75 minutes for traffic to the United States and 60 minutes for all other flights. In relative terms, Dublin Airport is performing poorly given that the comparator airports are much larger. Crucially though, the provision and assignment of stands at those airports is done specifically to enhance, promote and improve hub connectivity by developing sufficient infrastructure, putting in place adequate buffers and ensuring that those operators who do not support connectivity at those airports do not interfere with those who do. It is therefore imperative that the stands at Dublin be optimised and balanced across the campus, and those who do not connect at Dublin nor operate to the United States (and therefore do not require the facilities of Customs and Border Protection (CBP)), relocate away from the South Apron, P3 and P4 at the peak demand times to other parts of the airport where there is ample capacity. In any event, as daa demonstrated to the CC, the CBP facility is currently full until late morning and it is unclear to Aer Lingus how any

extra runway slots, were they to be declared by the Commission could be allocated to an operation requiring use of the facility before 1300z assuming that all carriers using the facility in the current S22 season retain and re-apply for their historic rights.

Additionally, there appears to be no forward planning in relation to the impact that the S23 capacity declaration could have on future seasons. We note that daa has recently submitted an application for planning permission for an underpass from the apron at P3 to the West Apron. If this application is successful and construction proceeds in 2024, it will require the withdrawal of stands on P3 from service which is core infrastructure that is used consistently by Aer Lingus. daa were unable to adequately address Aer Lingus' concerns at the CC on where and how aircraft with historical slots earned in S23 would be accommodated in S24 if the project proceeds. There will be an acute deficit of nightstands if the extra morning slots are declared in S23 and further untenable pressure on P3 and P4 demand if the stand rules are not revised should extra slots be released after the first wave. It is therefore imperative that any release of capacity at Dublin Airport is done in parallel with a requirement for a review of the stand planning assignment priorities at Dublin Airport to further enable and promote hub connectivity.

In relation to the proposal to reduce the local boarding load factor to 85% at Terminal 2, Aer Lingus has conducted its own analysis and affirms that the proposed level of local boarding passengers is appropriate. This is because the gap to the actual load factor is made up of connecting passengers who use Dublin as a hub (and for which we emphasise the importance of protecting its sustainability above). In addition, Aer Lingus expects to see an increase in terminal capacity for local departing passengers upon the introduction of new and enhanced equipment which should increase the throughput productivity at central search.

Runway capacity in night hours

As Aer Lingus has consistently stated, it is essential that the North Runway does not adversely impact on capacity at Dublin Airport.

In this section we address the Commission's comments in respect of any potential outcome that would result in a reduction in night hours flights at Dublin Airport. In this regard, we fully support the Commission in its Draft Decision not to impose any night hours flight restrictions that may be construed to derive from C5 (as defined in the Draft Decision). We believe it would be inappropriate for CAR to pre-emptively implement an unclear, fundamentally flawed and apparently ineffective condition, when to do so would have such a profoundly damaging impact to the aviation industry and Irish economy.

While clearly the Commission must, in accordance with its obligations take account of relevant technical, operational and environmental constraints (as well as any changes thereto), we believe that it would be wholly disproportionate for CAR to apply an

arguably invalid condition (for the reasons set out below) as against applying the actual published decision of ANCA (who are the competent authority) into its final decision.

In this regard, we distinguish CAR's responsibility to take relevant technical, operational and environmental constraints into account as against any suggestion that it is its responsibility to monitor, enforce and police planning matters.

We share the Commission's view as supported by other carriers that, based on the available information, it is not certain that C5 was ever validly brought into effect. We note the Commission's comments that it was never properly notified of the restrictions and accordingly, while the restrictions may have been widely commented upon, this should not remove the necessity for those parties responsible for the restrictions to notify them as required under the relevant prevailing national legislation. Accordingly, we support the Commission's analysis set out in paragraphs 3.83 to 3.89 of the Draft Decision.

We also reaffirm our position, as referred to by the Commission in the Draft Decision, that Aer Lingus would assess all options to protect its historical slot portfolio in the event of C5 impacting on capacity at Dublin Airport including any legal remedies which it may have in this regard.

While we believe that it should not be controversial that there should be no change to night hours flight for S23, we feel it necessary to bring to your attention the catastrophic impact that this would have on Aer Lingus in a hypothetical scenario where the Commission felt compelled to apply C5.

The implementation of C5 would seriously risk a permanent loss of connectivity for Ireland. The restriction fundamentally fails to recognise or reflect the progressive and dynamic nature of operations at Dublin Airport. Aer Lingus' stated mission is to be the leading value carrier across the North Atlantic. This can only be enabled by a sustainable short-haul network that leverages the geographic location of Dublin as a hub in an efficient manner by complementing a well-developed eastbound long-haul network which operates during the night and early morning (Dublin local time).

An operating restriction (such as C5) that would drastically cut the current levels of traffic which operate (and which enjoys historical slot rights) within the night period of 2300-0700 would result in a much reduced short-haul programme which will in turn, significantly undermine the extensive long-haul network from Dublin. The restriction which would reduce the maximum potential operating hours of the day (0700-2300) down to just 16 hours would mean that most based aircraft can only operate two round trips from/to Dublin as opposed to the current three round trips.

The consequential impact of this reduced aircraft utilisation would be to undermine the business case for future fleet investment in Dublin for all based carriers. Some airlines might respond to this reduced fleet by reducing the number of services operated by Irish-based aircraft and instead service Dublin by using aircraft based outside Ireland.

Pre-covid, Aer Lingus carried approximately 12 million passengers annually. As an employer with almost 4,500 staff, the majority of which are based at Dublin Airport, our firm view is that all of Dublin's Airport's infrastructure should be used efficiently. We are therefore fully supportive of the Commission's proposed approach in relation to C5.

Aer Lingus remains available to discuss any of these points with CAR in more detail.

Yours sincerely,



Steven Ronald
Director Schedules Planning and Alliances