

## Response of Deutsche Lufthansa AG

Received by email on Monday 27 July 2020 at 16:07

Dear Maria,

I remain with my comments already sent and please regard those as the written answer of Lufthansa.

We remain of the opinion, that the questions on Covid-19 cost containment are within the scope of this consultation as they will have an effect on the recalculated 2021 unit rate.

Kind regards

Stephan

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Stephan WEIDENHILLER  
Deutsche Lufthansa AG  
Group Regulatory & Industry Charges

Received by email on Monday 13 July 2020 at 13:44

Dear Sirs and Madams,

Ahead of the Irish ATC consultation next Monday I would like to file a set of questions regarding the actual Covid-19 situation, which are of interest for air space users and not yet reflected in the papers presented.

Due to the ongoing discussions of the EU Commission on the exceptional measures on RP3 and the possible replanning, those questions are deemed to be in the scope of this consultation as it would affect a future 2021 chargeable and determined rate.

Traffic situation

- o What is the current traffic situation in Ireland?
- o What is the underlying scenario for the remainder of 2020 and 2021 (in service units)
- o When do you expect to return to pre-crisis traffic levels?
- o What is the current capacity you are offering compared to last year?

What are the crisis measures taken to achieve cost reductions in 2020 & 2021 regarding

- o Staff costs:
  - What is the number of staff (FTE) currently needed vs. available given the current circumstances?
  - What do you do with the current staff surplus?
  - Is there a state sponsored scheme to support the ANSP with its staff costs, like temporary redundancy, furlough, "short work", etc.?
  - How is it used in your ANSP/MET/NSA?
  - What are the associated cost reductions?
  - What is the updated staff-planning scenario for 2021 onwards? What are the mid-/long term impacts on cost and capacity?

- o OPEX:
  - What are the cost reductions achieved and in what areas?
  - In what areas where no cost cuttings possible?
- o Investments:
  - What investments are/could be postponed?
  - What are the associated savings
  - What are the impacts on capacity?
  - What is the updates investment plan?
- o Depreciations:
  - Are there goods where the usage can/is extended due to Covid-19?

#### Cost of Capital

- o Eurocontrol loan
  - Why did you not take part in the Eurocontrol loan?
  - Can you obtain better conditions as the Eurocontrol loan? If yes, which ones?
- o Is there a possibility to restructure old, more expensive loans with better conditions?

#### Revenue 2020 and Carry-Over

- o What is the expected revenue shortfall for 2020?
- o What is the expected amount of the carry-over to be retrieved from airspace users?
- o Has the ANSP asked already the state to compensate (partly) the revenue shortfall? If not, why not?
- o Can airlines support the ANSP by addressing the state in order to ask for such compensation?

#### Restructuring of ANSP services

- o Are there plans to restructure the service providers in your country?
- o Have you made make-or-buy analysis for all components of the ATC services (Overhead, Operations, Technical services, etc.)?
- o Are there plans to outsource or sell businesses (e.g. MET)?
- What is the overall surplus Ireland achieved from ATC charges during 2018 & 2019 when taking account actual costs, actual traffic income and all adjustments like CPI, traffic risk sharing, etc.?

It would be extremely useful to address those questions during the consultation and would appreciate a discussion on it.

Kind regards

Stephan Weidenhiller