

A&L Goodbody

our ref | 01321196

your ref |

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Non-Confidential Version

Cathal Guiomard
Head of Economic Affairs
Commission for Aviation Regulation
3rd Floor
Alexandra House
Earlsfort Terrace
Dublin 2



Airbus– Response to Commission Paper CP4/2003

Dear Cathal,

We refer to Commission Paper CP4/2003 seeking representations from interested parties in regard to the review of the Commission's Determination on the Maximum Levels of Airport Charges and to the Addendum to Commission Paper CP4/2003 regarding the Draft Proposal for the Amendment of the Sub-Cap on Off-Peak Landing & Take-Off Charges at Dublin Airport.

1. Our client Airbus notes that one member of its A320 family of aircraft, namely the A318, is not categorized in the draft proposal. If added it should fall into the cost category 2 (ACN range 30-40 at €17.82 per movement).

Airbus also notes that certain aircraft that are equivalent to the Airbus A321 have not been categorised in the current draft.

2. Airbus wishes to ensure that, in the context of any commercial campaign, the –900 and –900X are not categorized alongside the –800 thereby unfairly discriminating against the A321.
3. The current categorisation places the A330-200s, with an ACN of 73 into cost category 7. However, Aer Lingus operates its A330-200s at actual take-off weights significantly below the maximum take-off weights that are used to calculate the ACN values assumed by the Commission. Consequently, the actual ACN values, on average, for the Aer Lingus operations will be below those used for the categorisation process.
4. Airbus notes that certain aircraft which are equivalent to the Airbus A330-200 have not been categorised.

Airbus would be happy to provide further information as requested by the Commission. In the meantime, if you have any questions, please do not hesitate to contact myself or Vincent Power.

Yours sincerely,

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