Mr. Bill Prasifka, Commissioner, Commission for Aviation Regulation, 36 Upper Mount Street, Dublin 2.

5th June 2001.

Dear Mr. Prasifka,

Following your paper "CP03/2001 – Consideration of the full Co-ordination of Dublin Airport", we wish to formally state that Servisair (Ireland) Ltd., supports full co-ordination at Dublin.

The basis for our views are laid out as follows:

Background:

For a number of years, Dublin Airport has suffered from large peaks in traffic volumes during the Summer months which on a number of occasions has resulted in the temporary shutdown of various parts of its operations.

This occurred mostly on Saturday and Sunday mornings and on a number of occasions, the entire process for passenger check-in had to be closed due to a number of factors:

- a) Inadequate number of Check in desks
- b) Unfair allocation of Check in desks
- c) Inadequate baggage sortation facilities
- d) Inadequate number of contact stands
- e) Poor planning and co-ordination in the utilisation of contact/remote stands
- f) Terminal capacity constraints
- g) Peak allocation of charter flights on days 6/7

Whilst the ongoing construction work at Dublin is helping to partially alleviate some of the above problems, the core issue remains that the overall <u>terminal capacity</u> at Dublin is insufficient to match the runway capacity.

It therefore makes no sense to continue to operate an airport where the most critical constraint (i.e. Terminal Capacity) is ignored.

Furthermore, Dublin remains one of the few large airports within Europe which does not operate full slot co-ordination. Surely the other major airports within Europe have not got it wrong?

The Case for Full Slot Co-ordination:

Whilst we understand that most of the airlines are not in favour of slot control and are aware that it may cause operational difficulties for them we must try and assess the issue as objectively as possible. To this extent we would argue that there are a number of advantages to operating a fully slot controlled airport.

- 1. Less Congestion:
 - a) Better quality service for passengers
- 2. Health & Safety:
 - a) Improved Passenger safety on Ramp area
 - b) Improved safety for Ramp / Operations staff
 - c) Improved operating conditions for Passenger Services staff
 - d) Helps minimise overcrowding
- 3. Optimisation of staff:
 - a) Better utilisation of staff through reduced volitility in schedules
 - b) Improve job security
 - c) Facilitate further investment in staff training
- 4. Lower cost base for GHA / Airlines:-

Slot co-ordination will help remove bottlenecks and thus reduce costs and boost passenger volumes.

5. Environmental:-

Noise / fume pollution spread over longer periods rather that large volumes in short time periods.

- 6. Will assist the airport authority in optimal manpower utilisation thus non core activities can be subcontracted. This will reduce the cost base for all companies engaged in airport activities.
- 7. Efficiencies in the airport can ultimately be passed back to the customer thus encouraging higher volumes of passengers.

Conclusion:

Full slot co-ordination is not a panacea.

It will not eradicate all the problems and issues at Dublin Airport.

However it has a number of advantages which we believe outweigh its disadvantages. These include greater efficiencies, lower costs and improved customer service. We therefore strongly support the case for full co-ordination to be implemented at Dublin.

Yours faithfully,

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Bernard Farrell,	
Director / General Ma	anager Ireland