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13th June 2008

Mr. Niall O'Connor
Commission for Aviation Regulation
3rd Floor
Alexandra House
Earlsfort Terrace
Dublin 2


**RE: Commission Notice CN 4/2008
Review of Travel Trade Legislation**

Dear Niall,

We refer to Commission Notice CN 4/2008.

We do not propose making a detailed submission at this stage in relation to the various matters referred to in the above Notice. However, we would draw your attention to the fact that the EU Commission has recently commenced a consultation process with regard to the implementation of Directive 90/314/EEC on Package Travel and Holiday Tours and consequent regulatory issues. The EU Commission has also issued a Proposal for a Regulation on common rules for air transport services in the EU (see COM (2006) 396). Given the pan-European nature of package travel and travel services generally and the need for consistent regulation, we believe that these matters should be dealt with at an EU level. We are therefore unsure as to the merit of a comprehensive review of current Irish requirements at this time pending the outcome of the various EU processes. We will however comment in more detail when we receive the Commission's consultation paper.

Yours sincerely,


Laurence Gourley
Manager Legal Affairs