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20 November 2020

Dr Adrian Corcoran
Director of Economic Regulation
Commission for Aviation Regulation
Dublin 2

By email: AdrianCorcoran@aviationreg.ie; info@aviationreg.ie

Re: IAA ANSP Response to Commission Paper 10/2020

Dear Adrian,

I am writing to you in relation to the proposed work plan by the Commission for Aviation Regulation ('CAR') to establish an Irish Performance Plan containing revised targets for the third reference period 2020-2024 ('RP3'). I can confirm that the Irish Aviation Authority's Air Navigation Service Provider ('IAA ANSP') is generally supportive of CAR's proposed process against an ambitious timeframe that has been set by the European Commission.

Further to paragraph 2.5 in CP 10/2020, IAA ANSP is of the view that *ex post* expectations on cost control measures implemented by IAA ANSP should be forthcoming before September 2021. IAA ANSP is eager to minimise the time period subject to retroactive regulation and requests that the interim results of the Operating Expenditure Review are made available earlier in 2021. Preferably this would also coincide with publication of the Union Wide Cost Efficiency Targets by the European Commission. Furthermore, given recent guidance from DG MOVE confirming there is no plan to deplete European ANSPs of resources, IAA ANSP believes that any subsequent guidance, or reasonable expectations, from Ireland's National Supervisory Authorities should have regard to the existing guidance at European level.

Thank you for the opportunity to provide feedback on your proposed work plan. Should you have any queries on this submission, please do not hesitate to contact me.

Yours sincerely,

Paul Johnson

Paul Johnson
Corporate Strategy and Regulation Manager

Bord Stiúirthóirí/Board of Directors

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