

Commission for Aviation Regulation  
3<sup>rd</sup> Floor  
Alexandra House  
Earlsfort Terrace  
Dublin 2

13 September 2018

**Re: Commission Paper 6/2019 Draft Decision on Summer 2020 Coordination Parameters at Dublin Airport**

**Dear Commissioner,**

This submission is in response to the consultation on the CAR's draft decision with respect to the Summer 2020 Declaration of Coordination Parameters at Dublin Airport. For the reasons outlined below, Stobart Air disagrees with any increase at this time, in the runway limits and total movements at Dublin Airport.

[Redacted content]

**2: Operational resilience**

Unlike pure point to point airlines, Stobart Air must ensure that our operations at Dublin Airport can work effectively as a connecting product for our partner airlines. Maximum on-time performance, dependable block times and airport efficiency form the backbone of our offering to partner airlines.

Any over-declaration of capacity will further risk causing significant operational disruption to passengers using Dublin Airport as a transfer point and those who are starting or ending their journey at the airport.

Whilst a marginal fall in on-time performance between Summer 2018 and Summer 2019 has been recorded, Stobart Air has been adversely impacted in key areas of our operation. As a carrier primarily focused on short, frequent flights between Ireland and the U.K, the escalation in erratic taxi times are having a disproportionate impact our ability to operate our schedules effectively.

While the CAR has stated ‘Actual taxi-times have increased by less than a minute’, over the course of a day these increases can amount to significant challenges for our operation. Stobart Air, like many airlines operate to other airports which have strict measures around runway slot allocation and retention, night curfews and closures. Such increased delay risks would reduce our ability to offer a dependable and frequent to consumers.

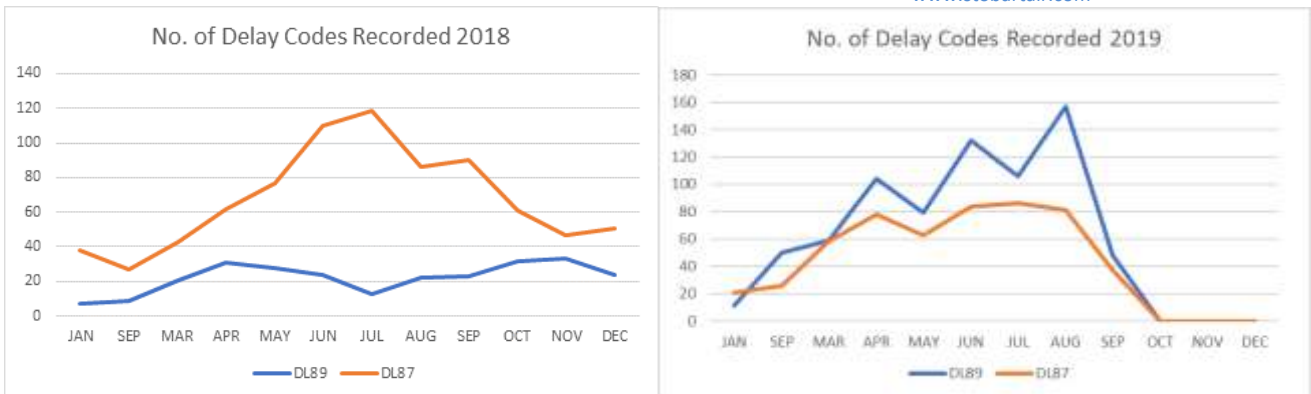
As invited by the CAR in the Draft Decision paper, Stobart Air provides the below evidence supporting the position that our ability to maintain a resilient operation is being pressurised by significant falls in on-time performance on both departures and arrivals across the day at Dublin Airport.

Departure On-time performance						Arrival On-Time performance					
	05AM-09AM	09AM-12PM	12PM-15PM	15PM-18PM	18PM-23PM		05AM-09AM	09AM-12PM	12PM-15PM	15PM-18PM	18PM-23PM
Mon	-7%	-12%	-25%	-23%	-37%	Mon	-9%	-3%	-13%	-20%	-18%
Tue	-4%	5%	-5%	-2%	-6%	Tue	-9%	2%	-12%	-9%	2%
Wed	0%	-8%	-6%	0%	-11%	Wed	1%	-7%	-12%	6%	7%
Thu	-7%	4%	-1%	-12%	-7%	Thu	3%	0%	-13%	-13%	-12%
Fri	-13%	-8%	9%	-3%	-9%	Fri	-22%	3%	-4%	1%	7%
Sat	-1%	4%	-7%	-17%	0%	Sat	-8%	-7%	-3%	-18%	-2%
Sun	-6%	-13%	-11%	-16%	-19%	Sun	-2%	-1%	-10%	-13%	-12%

Figure 1: Stobart Air departure and arrival OTP variances Summer 2019 to date v. Summer 2018 at Dublin Airport

The most damaging aspect of punctuality performance at Dublin Airport for Stobart Air is how the manifestation of airport congestion related delay has changed year on year.

Whilst we have seen a 34.2% reduction in the monthly average number of delays coded to DL89 (Restrictions at airport of departure), we have observed a 279% increase in the monthly average number of delays coded to DL87 (Airport facilities) which includes aspects such as Parking standing, ramp congestion and gate limitations. These two delay codes equate to a net monthly average increase of 18.7% in airport congestion related delay overall.



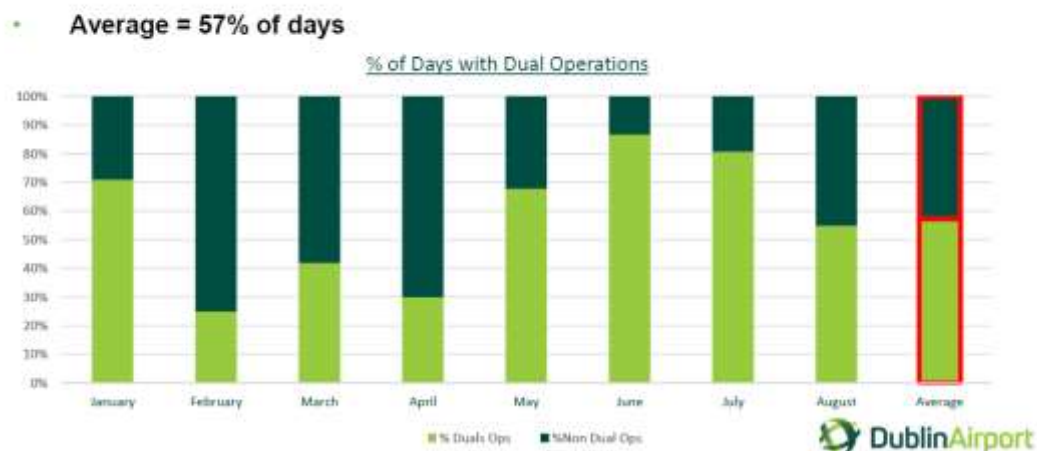
In particular, 279% represents a startlingly negative swing to occur within a single year for a delay reason such as Airport Facilities, where capital programs were due to deliver appropriate resilience.

### 3: Proposed works at Dublin Airport

While runway capacity declarations at Dublin Airport are based on single runway use of 28/10, dual operations are used frequently. Daa has demonstrated during the Stakeholder Engagement Process that on days where dual operations are available there is a marked improvement in on-time performance during Summer 2019.

In fact, usage of dual runway operations is most prevalent during the peak summer period, exactly when the DAA intends to withdraw the runway for the purpose of delivery of the 10/28 parallel, as demonstrated by DAA’s own analysis in the graphic below:

## Dual Operations – Usage statistics for 2019 YTD



Dual operations have become a tool for operational resilience at Dublin Airport, freeing up additional ramp space during peak times. An increase in traffic growth within the existing limits, along with the proposed increases during a time when this piece of infrastructure will be unavailable, may reasonably be expected to have a significant detrimental impact on all airlines, passengers and the airport in general.

Stobart Air welcomes the CAR's decision to follow the advice of the Coordination Committee in relation to terminal, stand and referral parameters.

In view of the above, we would request that the CAR review its draft decision and conclude that the coordination parameters should not be increased as proposed.

Yours sincerely,

A handwritten signature in black ink, appearing to read "AJolly", written over a horizontal line.

Andy Jolly

Managing Director