
DUBLIN AIRPORT
“Response to Draft Decision on Winter 2019 Coordination Parameters at Dublin Airport”
25 April 2019

Executive Summary

Dublin Airport welcomes the opportunity to respond to the Draft Decision on Slot Coordination Parameters for Winter 2019.

The Commission for Aviation Regulation ('the Commission'), by virtue of Section 8(1) of the Aviation Regulation Act, 2001, is the competent authority in Ireland for the purposes of Council Regulation (EEC) No.95/93 (as amended) on common rules for the allocation of slots at Community Airports, other than the function of the coordinator. Article 6 of the Slot Regulations states that, at a coordinated airport, the member state responsible shall ensure the determination of the parameters for slot allocation twice yearly, while taking account of all relevant technical, operational and environmental constraints as well as any changes thereto.

Article 5 of the Slot Regulation sets out the tasks of the Coordination Committee¹ which include making proposals concerning or advising the member state on:

- the possibilities for increasing the capacity of the airport determined in accordance with Article 3 or for improving its usage;
- the coordination parameters to be determined in accordance with Article 6;
- all questions relating to the capacity of the airport.

Dublin Airport proposed several changes to the Coordination Parameters for the Winter 2019 (W19) scheduling season to its Coordination Committee in April 2019. This proposal included increases to runway capacity, as well as rebalancing of runway capacity limits. The proposal was modelled by Dublin Airport using our own simulation modelling consultants as well as the capacity consultants appointed by the Commission. All modelling results were shared with the Coordination Committee and were used to agree the Committee's advice to the Commission. The Committee agreed to retain Terminal Capacity as they are by majority vote. The Committee agreed to support increases to runway capacity and did not agree to the proposed rebalancing of capacity.

The Commission has set out its Draft Decision which is:

- Relative to the Winter 2018 runway limits, increase the Total movement cap by 1 in the hours 0700, 1000 and 1700 hour.
- Relative to the Winter 2018 runway limits, increase the Departures cap by 1 in the hours 0700 and 1600 hour.
- Maintain the existing hard parameter on stands, and referral parameters on Terminal 2 Check-in desks and US Preclearance.

Dublin Airport welcomes and supports this decision to increase runway capacity. We would however, ask the Commission to re-examine the impact of declaring capacity in line with the original wishlist which was also modelled by Helios. Our proposal for extra capacity as well as rebalancing of capacity continues to be demand led. We believe these changes will provide current airlines with an opportunity to optimise their current slot portfolio for new operators and services.

We support a targeted and prudent policy of releasing capacity in incremental steps, in response to demand requirements, whilst maintaining service quality. Our view is summarised below:

¹ Membership of the Coordination Committee comprises Dublin Airport, the Irish Aviation Authority and airlines operating at Dublin Airport. While membership is open to all airlines operating at the airport, the following participated in the Winter 2019 process: Aer Lingus, British Airways, CityJet, Lufthansa, Ryanair, and Stobart Air.

1. The proposed changes to the runway scheduling limits represent a targeted, incremental release of capacity. The impact of these changes on runway throughput has been modelled by NATS, Dublin Airport’s Runway Capacity consultants. The impact on the airfield has been modelled by Arup. The results of both models support the rebalancing of capacity as well as the release of extra runway capacity without incurring delays that exceed the relevant criterion assessed. We therefore endorse the proposed runway coordination parameters but would strongly urge that the original “wishlist 1” be re-examined with a view to further also allowing for the rebalancing of capacity declared in line with that scenario
2. We support retaining the stand parameter as a hard constraint and referring to the airport for detailed assessment where demand exceeds supply
3. We support the Commission’s draft decision to retain the T2 check in and US Preclearance referral parameters

Dublin Airport Coordination Parameters Proposal

In developing its coordination parameter proposal, Dublin Airport took several factors into account. These included:

- Market intelligence from airlines regarding their growth plans including preferred slot times to suit their network connectivity and aircraft size;
- Existing levels of slot utilisation and identification of time periods where airlines would experience difficulties obtaining slots;
- Winter 2018 performance including queue times, taxi times and on-time performance (OTP);
- Infrastructural projects that would be delivered in advance of the W19 season;
- Infrastructural projects that would be ongoing during the W19 season.

We developed a forecast schedule for Winter 2019 based on our growth projections and market intelligence. This was used to complete our own capacity assessment of the terminal and airfield facilities that would be in place for Winter 2019. It identified where demand could be accommodated within the existing coordination parameters and time periods where incremental increases would be required. This forecast schedule was shared with Helios and used to inform its modelling for W19.

Our forecast schedule indicated a need to adjust the runway scheduling limits as follows:

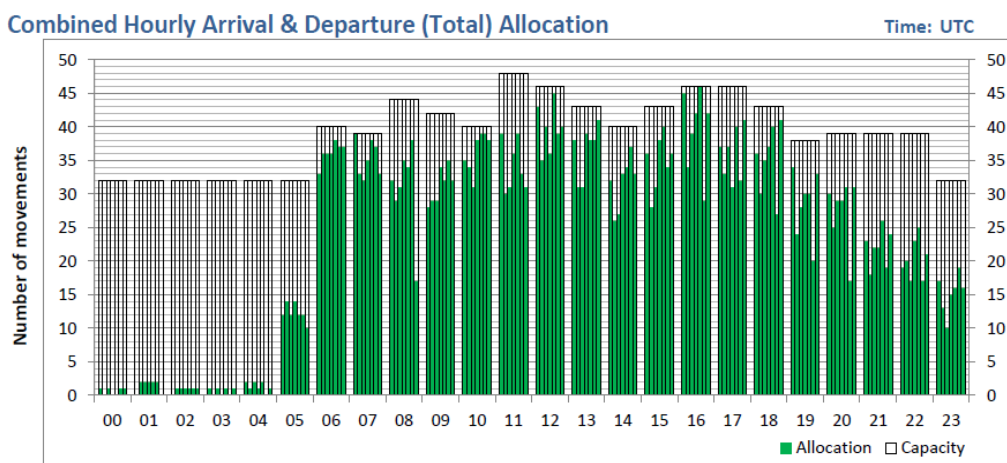
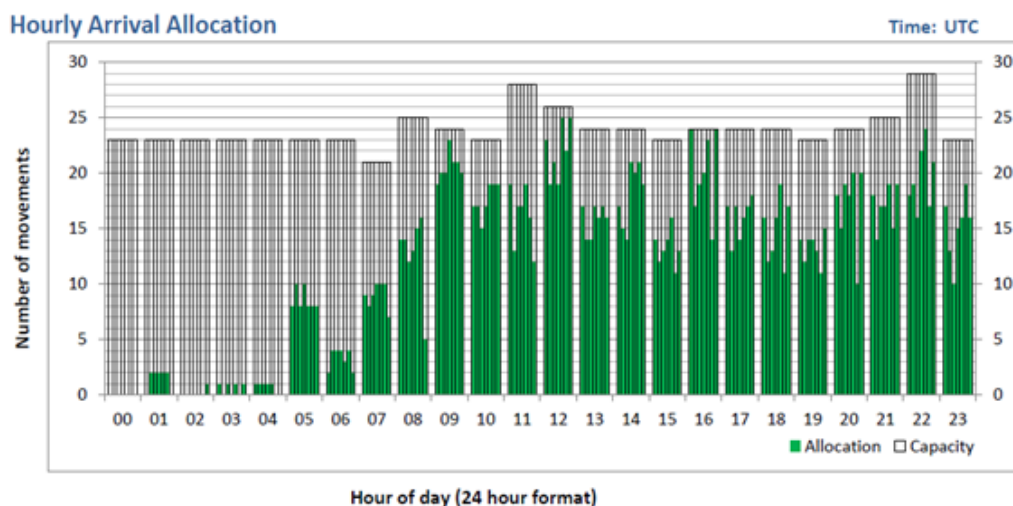
Wishlist 1

Hour	Arr	Dep	Tot
0700		1	1
0800	-1		-1
0900	1		1
1000			1
1100	-2		-2
1200	2		2
1600		1	
1700			1

The runway scheduling limits were adjusted to match the forecast profile of demand in each hour, rebalancing and increasing the number of movements where necessary.

The rebalancing of capacity has considered the current demand observed in the Winter 18 season, demand continuing from the S19 season into the W19 season and wishlist submissions that came through from the airlines.

The graphs below represent a typical busy week in the W18 season. Each green line represents the days of the week within each hour. This alone shows the capacity available in the 0800 and 1100 hours to allow for the rebalancing to the 0900 and 1200 hours. It must then also be considered the wishlist produced by ACL highlighting the expected demand for the 0900 and 1200 hours and the requirement to have capacity in these hours to achieve slot optimisation.



The proposed changes to the scheduling limits were modelled by NATS. Assessment was made of the delays during single runway mixed mode operations for Runway 28, Runway 10 and a weighted average of the two based on operational performance for Winter 2018. In assessing the changes, the delays for the proposal were evaluated against a maximum 10-minute delay criterion which was not to be exceeded for the peak average arrival or departure delays for Runway 28 operations.

Airfield Coordination Parameters

We note that Helios' analysis of the proposals has demonstrated that the differences in delay profile across the day is the same or marginal for the proposed W19 wishlist 1 v Option 1.

Scenario	Average departure taxi out time	Peak departure taxi out time	Average departure runway holding delay	Average departure ground delay	Average arrival taxi in time	Average arrival ground delay
Existing W18 limits	00:15:50	00:26:18	00:06:11	00:07:11	00:06:34	00:00:33
Wishlist W19 limits	00:15:32	00:25:13	00:05:44	00:06:49	00:06:35	00:00:31
Option 1 limits	00:15:08	00:25:13	00:05:40	00:06:42	00:06:33	00:00:32
Option 2 limits	00:15:38	00:26:18	00:06:03	00:06:57	00:06:37	00:00:35

The modelling results indicate minor differences between the daily averages and peak taxi times between Wishlist 1 (Wishlist W19 limits, as noted above) and Option 1, as shown above.

Dublin Airport provided the Commission and airlines with data showing actual on-time OTP and taxi-out times for W18. We welcome the Commission's recognition that OTP is driven by a wide range of factors and stakeholders that impact OTP.

In favour of Wishlist 1:

Operator	Voting Rights	Wishlist 1
daa	40	✓
IAA	20	✓
Ryanair	407	✓
Aer Lingus	327	X
Stobart	110	X
BA	36	X
CityJet	27	X
Lufthansa	32	-
For		467
Against		501
Abstain		32

Wishlist 1

Hour	Arr	Dep	Tot
0700		1	1
0800	-1		-1
0900	1		1
1000			1
1100	-2		-2
1200	2		2
1600		1	
1700			1

In favour of Wishlist 2 Option 1:

Operator	Voting Rights	Wishlist 2 Option 1
daa	40	X
IAA	20	X
Ryanair	407	X
Aer Lingus	327	✓
Stobart	110	✓
BA	36	✓
CityJet	27	✓
Lufthansa	32	-
For		501
Against		467
Abstain		32

Wishlist 2 Option 1

<i>Hour</i>	<i>Arr</i>	<i>Dep</i>	<i>Tot</i>
0700		1	1
0800			
0900			
1000			1
1100			
1200			
1600		1	
1700			1

Terminal Coordination Parameters

We used our Winter 2019 forecast schedule to model the journeys of arriving and departing passengers through both terminals to understand the demand at key processors e.g. Security Screening, CBP, Immigration etc. This was to ensure the proposed hourly capacities are achievable and do not represent a material reduction in level of service passengers for passengers.

We conducted extensive data collection to support our simulation modelling capabilities. This data includes:

- show-up profiles to check-in, security screening, gates
- baggage per passenger rates
- transaction times
- queuing times

This data was used to calculate the capacity of each processing facility. Based on the results of this modelling exercise we proposed retaining the current Terminal Coordination Parameters.

Referral Limits

We support the Commission’s decision to retain the referral limits for T2 Check-in and US Preclearance (CBP). Referral limits are preferable to hard limits in both these areas because they allow for the discussion of possible solutions including; time-changes, introduction of new technologies, or in the case of CBP post clearing. We believe that this approach leads to a more optimal solution for Dublin Airport, airlines and passengers when compared to the alternative of refusing a slot.

Conclusion

The Commission has relied on a large body of evidence to reach its draft decision. This includes results from simulation models completed by Helios, Arup and NATS to assess a range of scenarios related to the proposed changes in coordination parameters. Each set of results supports the proposed changes.

The determination of the coordination parameters and the methodology used have been presented to the Coordination Committee and discussed in detail in accordance with Article 6(3) of the Slot Regulation.

It should also be noted the largest carrier in Dublin Airport along with the IAA and daa support the growth in addition to the rebalancing, with 467 votes in total, 34 votes shy of the view from the other carriers present at the coordination committee meeting.

The rebalancing of capacity to the 0900 and 1200 hours would ensure slot optimisation for the Winter 19 season. Although none of the hours mentioned for rebalancing are at full capacity, the rebalancing is to allow for optimal use of slots. It also accounts for the shift in schedule demand we observed for Winter 2018.

Given the above, Dublin Airport supports the Commission's Draft Decision on Coordination Parameters for Winter 2019 in relation to increasing capacity but would strongly urge the Commission to re-examine the modelling results from the original wishlist "wishlist 1" to also allow for the proposed rebalancing of capacity.