

July 8, 2019

By e-mail

Commission for Aviation Regulation
3rd Floor Alexandra House,
Earlsfort Terrace,
Dublin 2
D02 W773

Re : Response to the 2019 Draft Determination CP3/2019

Dear Sir,

I refer to the above determination and wish to submit the view of CityJet DAC in this regard.

CityJet's business model has moved away from being a scheduled operator and we now operate 100% of our flights under capacity provision agreements for other airlines. As such, we are not responsible for payment of runway or passenger charges to airport operators, these being the responsibility of our airline customers. Hence, we do not have a direct exposure to changes in airport fees other than any impact such changes may have on the operating economics of our customer airlines.

We appreciate that all parties agree broadly on the need for the €1.8bn investment and that the issue between you and the daa is in relation to it being funded by income or efficiencies.

As a Dublin-based operator employing approximately 1,200 people across Europe, we have concerns on the impact of the proposed changes in the Draft Determination on airport infrastructure and the corresponding impact this may have specifically on our ability to grow our business at Dublin on behalf of our customer airlines and on the ease at which we may conduct our support business at the airport.

Today, CityJet operates two based aircraft at Dublin on behalf of a customer airline and we also serve Dublin by operating inbound from Europe on behalf of two other customer airlines. We are aware of the growth opportunities presented by the North Runway project and are positioning the airline to be able to respond to its positive impact on capacity to grow our business by further operations here at Dublin. Any such growth will require investment

by CityJet both in aircraft and people but only after our customer airlines have visibility on the availability of infrastructure to support such growth.

In this context, any actions which constrain Dublin Airport's ability to service the growing needs of airlines is unwelcome. The view of the daa that planned investment to provide critical infrastructure at Dublin must now be ceased is, in our view, a step which Dublin Airport, as a major transport hub and source of both direct and indirect employment, cannot bear. We also have concerns that the lack of infrastructure investment may further affect access to and thereby the case for our maintenance facility on the west side of the airfield via the proposed tunnel project.

It is essential in our view that the development of services and facilities at Dublin Airport continues uninterrupted to ensure the needs of airlines are met in a timely and controlled manner. Whilst we have no direct impact from the funding of such changes, we see delays in implementation as bringing negative results to CityJet's potential to grow business and employment at Dublin Airport. We urge a resolution which protects continued investment in the timely development of facilities at Dublin Airport.

Kind regards,



Cathal O'Connell
Chief Commercial Officer
CityJet DAC