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Datum/Date
8. Juli 2019

LHG Response to the 2019 Draft Determination CP3/2019

To whom it may concern,

On behalf of Lufthansa Group operating into Dublin Airport as Lufthansa, Swiss International Airlines and Eurowings we welcome the opportunity to comment on CAR's proposal on the proposed development of the Airport Charges.

We welcome the approach taken by CAR and the assessment conducted. We appreciate that the regulator has carefully weighed the operational needs of the airlines against the cost estimations of the airport operator and corrected them. The Lufthansa Group is supportive of the steps taken by CAR to correct the cost base by a bundle of measures, which should deliver the benefits intended by daa of the regulative period.

In detail, we support the regulative interventions taken on the cost of capital, delivery costs of the CAPEX program and the to-be-expected revenue from commercial activities leading to a reduced per passenger charge of 7.50€.

Nevertheless, we need to underline the need by CAR to monitor and follow-up the delivery of the CAPEX program closely, as the operational performance for Lufthansa Group Airlines at Dublin is inferior to other airports of comparable size.

The constrained availability of stands with air bridges at Dublin Airport leads to an extremely poor passenger experience and to unacceptable delays. The assigned stands are extremely challenging environments for servicing aircraft during turnarounds, often leading to safety concerns.

We currently operate over 3 piers leading to a disjointed operation, creating many daily obstacles for our passengers, handlers and crews.

As mentioned in our original submission to the airport authority daa, LHG would support CIP Project 20.03.043B Pier 2 Wide Body Enablement and Air-bridge Install. We



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believe this would give LHG and our alliance partner STAR, the opportunity to grow at DUB and offer our customers a seamless product.

If you have any questions regarding this submission or regarding our operations at Dublin Airport, please do not hesitate to contact us at any time.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'B. Koch'.

Dr. Benjamin Koch
Senior Director Airport / Industry Charges
& Commercial Provider Management FRA (PO)

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Sitz der Gesellschaft/Corporate Headquarters
Deutsche Lufthansa Aktiengesellschaft, Köln

Registereintragung/Registration
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