

Commission for Aviation regulation
3rd Floor, Alexandra House
Earlsfort Terrace
Dublin 2

18th November 2015

Re: Application by DAA for ATI Fee Approval – Baggage Hall Desks (DUB)

Dear Sir/Madam,

We refer to Commission Notice 3/2015 in relation to the above.

While Aer Lingus is not opposed in principle to the fee as proposed by the DAA, there are a number of issues on which we would like clarification before taking a final view of this application. In particular, we would be grateful if you could clarify the following matters:

- The extent to which DAA is expected to recover under ATI fees compared to the €2.2M cap set out in the 2014 Determination?
- Clarification on which airport infrastructure is subject to CAR approval under the SI 505 of 1998. For example, should charges relating to all desks used for passenger handling be included such as ticket desks and transfer desks?
- The basis on which the DAA has proposed to limit cost recovery for the baggage hall desks to 25% while the corresponding cost recovery of check-in desk is 46%.
- We note that the proposed charge does not include the provisions of related technology (e.g. the provision of CUTE) in contrast to the check-in charge which is inclusive of these costs. Is there a reason for this difference in treatment?
- Please confirm whether or not local council rates are included in the proposed charge.

We would welcome the opportunity to discuss the above matters with you at your convenience.

Best regards,

Laurence Gourley
Director of Legal