

Ms. Anne Moloney
Deputy Head of Economic Affairs
Commission for Aviation Regulation
36 Upper Mount Street
DUBLIN 2
Republic of Ireland

07th May 2002

Dear Ms Moloney

CONSULTATION PAPER ON THE IMPLEMENTATION OF THE LEVY
PURSUANT TO SECTION 23 OF THE AVIATION REGULATION ACT 2001

We apologise for the lateness of this submission, which has been delayed for a number of reasons. We hope you may still be able to consider the content along with others you have received.

Most airlines would agree that co-ordination is a necessity but impacts the desired business of flying an optimum schedule. Having accepted co-ordination, the question of funding the process is raised. The question of who pays is already established by precedent. Current practice is that indigenous airlines fund co-ordination in their state.

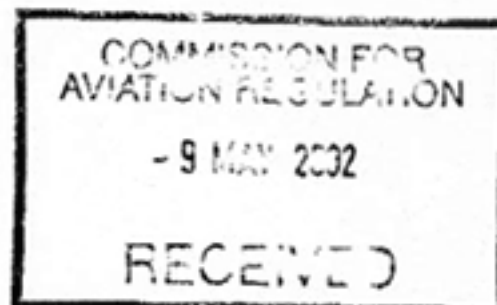
Para 6.3 details the options for recovery of expenditure, but we would submit costs should be recovered from home based carriers, not all users.

Please take this letter into your considerations.

Yours sincerely



Terry Lee
Licensing and Planning Support Manager



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