

IATA response to the Irish Commission for Aviation Regulation Paper CP11/2001 of 17 October 2001 on the proposed Maximum Levels of Aviation Terminal Service Charges

Our responses are made in line with the Section numbering in paper CP11/2001.

1 EXECUTIVE SUMMARY

We fully recognise the difficulty in the uncertainty of traffic forecasts in the current circumstances, and appreciate the stated intention of the Commission that it will endeavour to ensure that its final determination is based on the best information available at that time. However, in view of these exceptional circumstances, we respectfully propose that the Commission consider deferring its final determination until there is general acceptance that the situation has stabilised. Against this background of uncertainty, it should also be noted that when a recovery does eventually start, this is likely to be on the back of very low yields for the airlines. While a recovery will eventually be identified in terms of increased movements or passenger numbers, this will take a considerable time to translate itself through to the bottom-line of the airlines.

2 CONSULTATION PROCESS TO DATE

IATA welcomes the opportunity to respond to this paper. Unfortunately we were unaware of the previous work on this important issue of the proposed economic regulation of terminal navigation charges (TNC) in general, or the previous Papers CP4/2001 and CP5/2001 in particular. We recognise that these were posted in the Commission's website and perhaps published in the Irish press. It would be very helpful however, if consideration could be given to advising international parties who have an interest in Irish Aviation when any future consultation papers are posted on the website.

We appreciate that Irish terminal navigation services (TNS) charges have been reduced some 49% since IAA took over responsibility from AerRianta in 1996. The IAA has consistently provided good customer consultation both on request and on a proactive basis. These are among the reasons that the IAA won the IATA Eagle Award "Partnership in Productivity" for 1998. Nevertheless, we recognise that the increasing commercialisation of ANS provision, together with likely future developments, requires economic regulation to protect users' interests. Additionally, as Irish airports have recently become regulated, it is logical that the TNS service used by the operators who land and take-off at those airports should also be regulated.

3 SCOPE OF AVIATION TERMINAL NAVIGATION SERVICES CHARGES

We query whether the term "while in the vicinity of an aerodrome" could be considered appropriate or relevant in this context. Our understanding is that the "20 kms rule" should only be applied for charging purposes, and not for cost-allocation purposes. Proper cost-allocation in line with ICAO principles requires the full allocation of the costs incurred for the operational service provision. This enables site-specific charging, which IATA fully

supports, as well as giving a better reflection and transparency of costs. The alternative use of a common-rated, or system-wide charge, encourages and permits cross-subsidisation.

With the increasing integration of approach and departure control services into ACCs, we accept that cost-allocation may become increasingly difficult and arbitrary. Nevertheless, the allocation by general percentage keys leaves scope for misinterpretation and endless discussion, and should be avoided where possible.

Application of the “20 kms rule” implies that only the tower and landing aids-related costs are being included in the TNC cost base, but not necessarily the associated approach and departure costs. This leads to the unjustified subsidisation of TNC by en route users, which is a situation that has been identified by the recent Price Waterhouse Coopers (PwC) Study into European TNC on behalf of the European Commission (EC

4 STATUTORY OBJECTIVE AND PROPOSED DEGREE OF RELIANCE ON STATUTORY FACTORS.

Statutory Objective

The Commission’s key obligations “to facilitate the development and operation of cost-effective terminal service” and to ensure that “prices are cost-reflective”, cannot be adequately addressed unless transparent and justified cost-allocation has been established. In this context we would also refer to the recommendation in paragraph 15 of the Executive Summary of the PwC TNC Study, Proposals for Reform. In particular they highlight “that our proposals are intended to end a number of the hidden cross-subsidies and examples of discrimination that are inherent in the existing charging system. At present these flights are cross-subsidised by other flights through a number of means including disproportionately low terminal and ANS charges in many States, and uniform charges across all airports. Abolition of these cross-subsidies will result in fairer competition between airlines and between other transport modes”.

Statutory Factors

a) “The relevant charging principles of ICAO and EUROCONTROL (ECTL)”

We fully support the principle that aircraft weight should be taken into account, but less than in direct proportion. We believe this correctly reflects ability to pay or value of service.

In our view the ECTL “Rules governing terminal charges in Ireland” can be misleading in this context. Establishment of the Irish TNC cost base, the cost-allocation applied, and the unit rate calculations are the responsibility of the IAA, not ECTL. ECTL merely provide the billing and collection service on behalf of the IAA within a bilateral agreement, and within the Irish ATC provider and Irish State rules and requirements.

We would be very concerned if a move to movement based charges was considered. As previously mentioned, we fully support the ICAO principle that weight is taken into consideration as a proxy for ability to pay and value for service.

The Commission should be aware of the outcome from the recent ECTL Possible Pricing Mechanisms Task Force (T/F). Over some eighteen months this TF conducted detailed studies into various economic and marginal pricing possibilities, including the use of fixed/variable elements and other price differentiation parameters. The T/F concluded that following detailed examination of alternative possible pricing mechanisms, a change from the current weight-related formula would have no measurable impact on the distribution of demand or a better use of airspace. It confirmed that the current formula is accepted by all the relevant stakeholders as a good trade-off between cost-relatedness and ability to pay.

The PwC Study recommends that any consideration of marginal costs for a charging structure should not be taken at this time, but reviewed again once the main changes and requirements have been introduced. Our understanding for this decision is that while they are aware of the EC's academic interest in marginal costs, PwC are also well aware of the practical difficulties of applying such economic principles to charges, and of the user community's dislike of them. In our view, not only is marginal cost pricing difficult to implement for aviation charging, but is ineffective in addressing capacity problems and may result in discriminatory practices. We would be happy to expand on these views in more detail if required.

With regard to the principle of 100% financial cost-recovery, it should be noted that ICAO Doc 9082/6 Paragraph 22 viii confirms that full costs do not have to be recovered. This may be significant if there are State or regional authority requirements to consider subsidisation, particularly of smaller airports, for social or economic regional reasons. Proper cost-allocation is likely to increase charges at smaller airports, which may encourage authorities to apply discriminatory rebates that would also be contrary to the principle of cost-related charging. In these circumstances any such rebate should be paid or funded by the state or regional authority requiring it.

b) "The level of investment in TNC in order to meet needs of the airline industry"

The level of information in Annex 1 of CP11/2001 is insufficient to form any views or comments with regard to the capital expenditure programme. Increased detail, transparency, and consultation would be required to make this possible. We requested a breakdown of TNC costs during our last charges consultation with the IAA in February 2000. From the information provided at the time it was noted: -

- Tonnage was increasing more than movements
- Depreciation and interest costs were decreasing in contrast to those for the en route cost base, which were increasing.
- No MET or AIS costs were allocated to TNC cost base

Cost-allocation keys and details were provided on the allocation of capital and operational costs, but the overall impression was that en route was subsidising TNC. IAA have advised they are initiating and validating an Activity Based Costing study, which would assist to ensure that the various costs were correctly identified and allocated where they are incurred or used. In fairness to the IAA, it has to be noted that the TNC has been reduced by almost 50% since they assumed responsibility for the charging from AerRianta in 1996. While some of

this may be attributable to volume increase, we believe that a significant contribution has also come from efficiency and productivity improvements.

With regard to MET costs, we understand that some 50% of the total Irish MET costs, or almost Euro 7m, is currently allocated to civil aviation. This is significantly and unjustifiably higher than the average allocation to civil aviation in many other European States, which averages around 20-25%. In this context we are equally concerned that 100% of this amount is allocated to the en route cost base and charges.

c) “The efficient and effective use of all resources by the Authority”

Amongst the Commission’s stated aims, is “to facilitate the development and operation of cost-effective terminal services”. In our view the Commission cannot rely on the “centrality of efficiency in the statutory objective” unless and until there is justified and transparent cost-allocation between en route and TNC. We would like confirmation of this prior to any final determination.

Information from the EUROCONTROL PRC should be used with caution for this purpose. Comparisons may be flawed if the reports relate to en route, and, as concluded in the PwC Study into European TNC, it is believed that en route is subsidising TNC in most countries.

In our view one of the major purposes of economic regulation is to drive for operational and capital efficiencies in the absence of competition. We are aware that under price regulation there is a temptation for providers to increase profits through reducing quality. The necessary quality levels can be ensured through the application of appropriate service standards. Considerable information and examples are available from the recent consultation on the UK NATS economic regulation, and the Commission is no doubt aware of these.

d) “The level of the Authority’s income from TNS and other revenue earned generally”

We would agree that the system of 100% full cost recovery is difficult to reconcile with economic regulation. However, it would be unjustified to consider subsidising TNC from en route, especially as an element of discriminatory cross-subsidy evidently already exists. It is noted that the majority of en route traffic does not land at Irish Airports.

e) “Operating and other costs incurred by the Authority in provision of TNS”

As mentioned in 1. above, we support the idea of deferring any change on the TNC until the current situation has stabilised, realistic traffic forecasts are available, and better cost and revenue information will be available.

f) “The level of quality and the reasonable interests of the users of these services”

As mentioned in 4 c) above, we believe that price regulation must be accompanied by service quality standards. These should be basic, and established through consultation with users. The Authority should maintain a dialogue on these standards, which will allow them to evolve and develop as required.

g) “The cost competitiveness of TNS with respect to international practice”

As we are not familiar with the regulation of non-aviation business, we are unable to comment on the applicability or usefulness of their comparative data. From our close involvement with aviation related regulation, however, we are aware that benchmarking exercises for cost-competitiveness and operational efficiency purposes are very interesting, but not necessarily meaningful. Comparisons are difficult in view the lack of a harmonised system. For charging and value for money purposes we find it more meaningful and relevant to compare the year-on-year performance of the individual provider. Traffic and financial data inputs are used to show the historical development and to derive basic yearly performance and productivity indicators (PPI). Copies of our Irish en route and TNC PPI will be provided separately to the Commission.

5 DRAFT DETERMINATION

Our preference is for site-specific charges, rather than a common-rated system charge for the three airports. This would result in cost-related charges in line with ICAO recommendations, and avoid cross subsidies.

6 EXPLANATORY MEMORANDUM

The Commission has identified that the IAA’s TNC charges fall below the average cost of providing the service. We presume that this has taken into consideration the possible impact of the adjustment mechanism on the cost base. If so, then the Commission’s finding may be as a result of incorrect cost-allocation between en route and TNC. Should the Commission therefore decide to subsequently raise the maximum TNC to a level where the costs of provision of aviation TNS charges would be fully recovered, we would also like assurance that the appropriate compensating reduction will be made to the IAA’s en route cost base.

We are strongly opposed to the application of peak/off-peak charges differentials for ATC or TNC. Supposedly demand-altering pricing schemes could only have an effect if users have control over their demand patterns. This is clearly not the case, as airline scheduling is dictated by the market demand. Schedules are constructed in response to passenger and cargo demand. An airline has little opportunity to adjust to such a system in an efficient way due to the complex task of scheduling its operations. Peak charges therefore only serve to increase costs for those users operating during the peak periods and may discriminate against certain users. Additionally, there is a deterioration of transparency with peak/off-peak charges structures.

7 INFORMATION RELIED ON TO CALCULATE MAXIMUM CHARGES

We believe that more information than the very basic details on the capital expenditure plan provided in Annex 1 are required for us to make any meaningful comments. In particular, it is noted that this does not specify the amounts related to the TNC service, cost base or charges.

CONCLUSION

We support the economic regulation of TNC through the determination of maximum charges, which encourage increased efficiency and productivity. As a prerequisite we believe this requires proper justified and transparent cost-allocation between the en route and TNC cost bases. We support the use of weight-related rather than movement-related charges, as this better reflects ability to pay and value for service. We are strongly opposed to peak/off-peak charges. Quality levels should be ensured against possible “thriftling” by the application of appropriate service standards. We would of course be very pleased to provide the Commission with more details on any our views and comments.

Additional information sent separately:

Examples of IAA En route and TNC Performance & Productivity Indicators

Geneva 11 Dec 2001.

EUROCONTROL Ireland

Calculation and Data Area

Year for reports to be entered here (NOT cut & paste!):

Year (input)	1999	2000	2001	2002	2003	2004	2005			
Year Id (lookup)	A	A	E	F	P1	P2	P3	#N/A	#N/A	#N/A
Xrate (looked up)	0.78756	0.78756	0.78756	0.78756	0.78756	0.78756	0.78756	#N/A	#N/A	#N/A

Entry Code: **IE**
 Currency: **euro**
 Scale: **(000)**

Data Entry:

General and Economic Data							Adj.	January		Mid-Yr	INVEST
General	YrId	YrGen	XRATE	XRTCH	CPI	IntRate	URLOC	URXEU	URCALC	URJun	InvRte
Gen88	A	1988	0.7749		2.2		28.55	36.84	32.51		0
Gen89	A	1989	0.77399	-0.1	4.1		22.39	28.93	28.25		0
Gen90	A	1990	0.77597	0.3	3.3	11.3	19.90	25.65	26.20		0
Gen91	A	1991	0.76781	-1.1	3.2	10.6	19.23	24.94	25.02		4,298
Gen92	A	1992	0.76072	-0.9	3.1	12.7	18.39	23.95	26.08		3,023
Gen93	A	1993	0.79995	5.2	1.4	9.9	18.14	23.68	23.55		1,625
Gen94	A	1994	0.79362	-0.8	2.3	8.0	21.08	26.14	27.31	26.11	2,520
Gen95	A	1995	0.81553	2.8	2.5	8.0	22.10	27.62	22.43		3,679
Gen96	A	1996	0.79345	-2.7	1.7	8.0	20.46	24.96	23.42	19.42	5,041
Gen97	A	1997	0.74432	-6.2	1.5	8.0	16.49	20.92	19.26		6,718
Gen98	A	1998	0.78641	5.7	2.4	8.0	16.50	22.28	19.97	21.51	5,403
Gen99	A	1999	0.78756	0.1	4.0	6.0	17.36	22.04	20.32	20.00	
Gen00	A	2000	0.78756	0.0	6.5	6.5	16.25	20.63	18.23		
Gen01	E	2001	0.78756	0.0	5.0	7.0	15.33	19.46	21.67		
Gen02	F	2002	0.78756	0.0	4.5	7.0	16.87	21.42	21.42		
Gen03	P1	2003	0.78756	0.0	4.5	7.0	0.00				
Gen04	P2	2004	0.78756	0.0	4.5	7.0	0.00				
Gen05	P3	2005	0.78756	0.0	4.5	7.0	0.00				
Gen06	P4	2006					0.00				
Gen07		2007					0.00				
Gen08		2008					0.00				
Gen09		2009					0.00				
Gen10		2010					0.00				
Gen11		2011					0.00				
Gen12		2012					0.00				

		Service Units (000)			Movements (000)					Distance	
Traffic	YrTra	SuTot	SuExmt	SuChrg	IFR	OverFlt	ArrDep	Dom	Military	FltDist	IFRkms
Traf88	1988	829.1	27.8	801.3	260.7	42.0	50.0	8.0		165	43.1
Traf89	1989	903.1	27.4	875.8	289.8	42.0	50.0	8.0		166	48.1
Traf90	1990	1,023.0	45.4	977.6	315.1	46.0	46.0	8.0		173	54.6
Traf91	1991	1,301.8	69.1	1,232.7	311.3	54.0	39.0	7.0	5.6	216	67.2
Traf92	1992	1,410.2	30.9	1,379.3	328.7	52.0	41.0	7.0	2.9	220	72.4
Traf93	1993	1,597.7	29.7	1,568.0	345.6	51.2	42.4	6.4	2.5	235	81.0
Traf94	1994	1,567.0	31.2	1,535.8	365.3	56.6	38.7	4.7	2.4	221	80.7

EUROCONTROL Ireland

Calculation and Data Area											
Traf95	1995	1,822.6	34.2	1,788.4	390.3	55.0	40.8	4.2		239	93.2
Traf96	1996	1,947.3	34.9	1,912.4	423.2	56.2	39.4	4.4		235	99.6
Traf97	1997	2,096.0	32.7	2,063.3	454.4	55.0	40.8	4.2		236	107.3
Traf98	1998	2,290.2	51.1	2,239.1	412.3	53.3	42.2	4.5		284	117.2
Traf99	1999	2,544.6	50.1	2,494.5	443.8	54.0	41.7	4.3		290	128.9
Traf00	2000	2,673.9	42.5	2,631.4	467.3	52.2	42.7	5.2		290	135.7
Traf01	2001	2,648.8	42.1	2,606.7						#DIV/0!	
Traf02	2002	2,667.9	42.4	2,625.5						#DIV/0!	
Traf03	2003									#DIV/0!	
Traf04	2004										0.0
Traf05	2005										0.0
Traf06	2006										0.0
Traf07	2007										0.0
Traf08	2008										0.0
Traf09	2009										0.0
Traf10	2010										0.0
Traf11	2011										0.0
Traf12	2012										0.0

Staff Numbers

Staff	YrSta	StaffTot	AtcoRte	AtcoTot	OtStaff
Staf88	1988		140		
Staf89	1989	236	140	191	45
Staf90	1990	269	140	192	77
Staf91	1991	273	166	203	70
Staf92	1992	266	175	220	46
Staf93	1993	264	164	202	62
Staf94	1994	261	182	212	49
Staf95	1995	275	194	227	48
Staf96	1996		196	231	
Staf97	1997		201	236	
Staf98	1998		209	244	
Staf99	1999		212	250	
Staf00	2000		228	269	
Staf01	2001		246	284	
Staf02	2002		251	289	
Staf03	2003		258	296	
Staf04	2004		261	299	

Calculation and Data Area

Staf05	2005		269	307	
Staf06	2006				
Staf07	2007				
Staf08	2008				
Staf09	2009				
Staf10	2010				
Staf11	2011				
Staf12	2012				

Cost Data

Funcost	YrFun	Total Empl.								Irrecover VAT	New Tot
		Empl	AtsCom	Maint	OpCost	Depr	Interest	FunOth	FunTot		
Fun88	1988	15,309	8,857	447	1,560	699	862	1,551	20,428		
Fun89	1989	15,637	8,867	1,857	974	1,132	607	1,938	22,145		
Fun90	1990	19,164	11,143	1,699	1,023	1,621	970	2,193	26,671		
Fun91	1991	22,440	13,406	1,524	1,648	2,475	2,516	2,890	33,492		
Fun92	1992	23,159	14,965	1,220	1,593	3,173	3,356	3,481	35,983		
Fun93	1993	21,811	13,410	1,386	1,584	2,990	2,383	4,985	35,140		
Fun94	1994	23,128	15,113	1,663	1,424	5,581	3,601	1,740	37,138		
Fun95	1995	17,093			13,871	4,270	2,066	0	37,300		
Fun96	1996	19,314			15,779	4,664	1,548	0	41,306		
Fun97	1997	22,535			16,578	5,390	1,722	0	46,225		
Fun98	1998	20,290			18,713	4,963	1,645	0	45,611	89.0	
Fun99	1999	21,727			21,846	4,040	1,264	0	48,877	125.0	
Fun00	2000	23,117			19,066	3,854	1,065	0	47,102	200.0	
Fun01	2001	30,830			22,625	3,546	1,249	0	58,250	250.0	
Fun02	2002	31,254			24,262	3,176	1,255	0	59,947	250.0	
Fun03	2003	28,921			22,660	8,054	3,260	0	62,895	250.0	
Fun04	2004	29,305			23,783	13,143	6,217		72,448	300.0	
Fun05	2005	30,550			24,795	12,854	5,711		73,910	300.0	
Fun06	2006								0		
Fun07	2007								0		
Fun08	2008	0	0	0	0	0	0	0	0		
Fun09	2009	0	0	0	0	0	0	0	0		
Fun10	2010	0	0	0	0	0	0	0	0		
Fun11	2011	0	0	0	0	0	0	0	0		
Fun12	2012	0	0	0	0	0	0	0	0		

Actcost	YrAct	Total Empl.								ActTot	Xrate
		ATM	Train	Tests	Admin	AIS	MET	SAR	ActOt		
Act88	1988	12,481	218	0	2,802	419	4,513			20,433	
Act89	1989	13,587	310	0	3,017	533	4,698			22,145	
Act90	1990	17,020	328	0	3,726	620	4,980			26,675	
Act91	1991	22,356	398	0	4,862	516	5,361			33,492	
Act92	1992	24,247	774	0	4,607	449	5,906			35,983	
Act93	1993	22,956	556	0	4,001	947	6,679			35,140	
Act94	1994	24,965	674	0	4,215	943	6,341			37,138	
Act95	1995	25,825	802	0	3,560	981	6,131			37,299	
Act96	1996	27,523	1,233	0	5,532	1,214	5,805			41,306	
Act97	1997	30,509	1,275	0	7,954	1,331	5,156			46,225	
Act98	1998	29,538	2,642	0	5,989	1,214	6,227			45,611	
Act99	1999	29,835	4,094	0	7,119	1,303	6,526			48,877	
Act00	2000	29,788	4,178	0	5,329	1,331	6,476			47,102	
Act01	2001	39,493	4,150	0	6,061	1,682	6,864			58,250	
Act02	2002	38,691	5,042	0	7,103	2,127	6,984			59,947	
Act03	2003	41,546	4,642	0	7,354	1,857	7,496			62,895	
Act04	2004	49,112	5,434	0	7,896	2,173	7,833			72,448	
Act05	2005	49,713	5,543	0	8,252	2,217	8,185			73,910	
Act06	2006									0	
Act07	2007									0	
Act08	2008	0	0	0	0	0	0	0	0	0	
Act09	2009	0	0	0	0	0	0	0	0	0	
Act10	2010	0	0	0	0	0	0	0	0	0	
Act11	2011	0	0	0	0	0	0	0	0	0	12/21/01
Act12	2012	0	0	0	0	0	0	0	0	0	

Adjcost	YrAdj	Rev	NatCost	ChgBas	AdjBase	EctIcst	VFRCst	ExmtCst	Proloss	Balance
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EUROCONTROL Ireland

Calculation and Data Area

Adj88	1988	27,105	20,433	20,687	26,052	1,096	116	725	6,418	-5,365
Adj89	1989	27,021	22,145	22,828	24,744	1,536	129	724	4,193	-1,916
Adj90	1990	26,546	26,675	26,666	25,612	1,370	129	1,250	(120)	1,053
Adj91	1991	30,765	33,492	33,115	30,838	1,643	130	1,890	(2,350)	2,277
Adj92	1992	33,127	35,983	36,903	35,969	1,894	131	842	(3,776)	934
Adj93	1993	36,055	35,140	36,849	36,922	2,544	125	710	(794)	(73)
Adj94	1994	40,387	37,138	39,107	41,949	2,902	126	806	1,281	(2,842)
Adj95	1995	48,495	37,299	39,248	40,116	2,835	123	762	9,247	(867)
Adj96	1996	47,472	41,306	43,225	44,786	2,847	126	802	4,247	(1,561)
Adj97	1997	39,937	46,225	48,129	39,750	2,811	134	772	(8,192)	8,380
Adj98	1998	46,356	45,611	47,393	44,708	3,004	127	1,094	(1,037)	2,686
Adj99	1999	54,755	48,877	50,867	50,680	3,152	127	1,035	3,888	187
Adj00	2000	54,351	47,102	49,610	47,962	3,445	127	810	4,741	1,649
Adj01	2001		58,250	60,573	56,498	3,606	127	1,157	0	4,075
Adj02	2002		59,947	62,630	56,240	3,821	127	1,011	0	6,390
Adj03	2003		62,895	67,234	67,234	4,339			0	0
Adj04	2004		72,448	76,959	76,959	4,511			0	0
Adj05	2005		73,910	78,512	78,512	4,602			0	0
Adj06	2006			0	0				0	0
Adj07	2007			0	0				0	0
Adj08	2008			0	0				0	0
Adj09	2009			0	0				0	0
Adj10	2010			0	0				0	0
Adj11	2011			0	0				0	0
Adj12	2012			0	0				0	0

XEUcost	YrXEU	XRev	XNCost	XChgBas	XAdjBas
XEU88	1988	27,105	20,433	20,687	26,052
XEU89	1989	27,021	22,145	22,828	24,744
XEU90	1990	26,546	26,675	26,666	25,612
XEU91	1991	30,765	33,492	33,115	30,838
XEU92	1992	33,127	35,983	36,903	35,969
XEU93	1993	36,055	35,140	36,849	36,922
XEU94	1994	40,387	37,138	39,107	41,949
XEU95	1995	48,495	37,299	39,248	40,116
XEU96	1996	47,472	41,306	43,225	44,786
XEU97	1997	39,937	46,225	48,129	39,750
XEU98	1998	46,356	45,611	47,393	44,708
XEU99	1999	54,755	48,877	50,867	50,680
XEU00	2000	54,351	47,102	49,610	47,962
XEU01	2001	0	58,250	60,573	56,498
XEU02	2002	0	59,947	62,630	56,240
XEU03	2003	0	62,895	67,234	67,234
XEU04	2004	0	72,448	76,959	76,959
XEU05	2005	0	73,910	78,512	78,512
XEU06	2006	0	0	0	0
XEU07	2007	0	0	0	0
XEU08	2008	0	0	0	0
XEU09	2009	0	0	0	0
XEU10	2010	0	0	0	0
XEU11	2011	0	0	0	0
XEU12	2012	0	0	0	0

En Route Charges Development 1993 - 2002 Index 1992 = 100

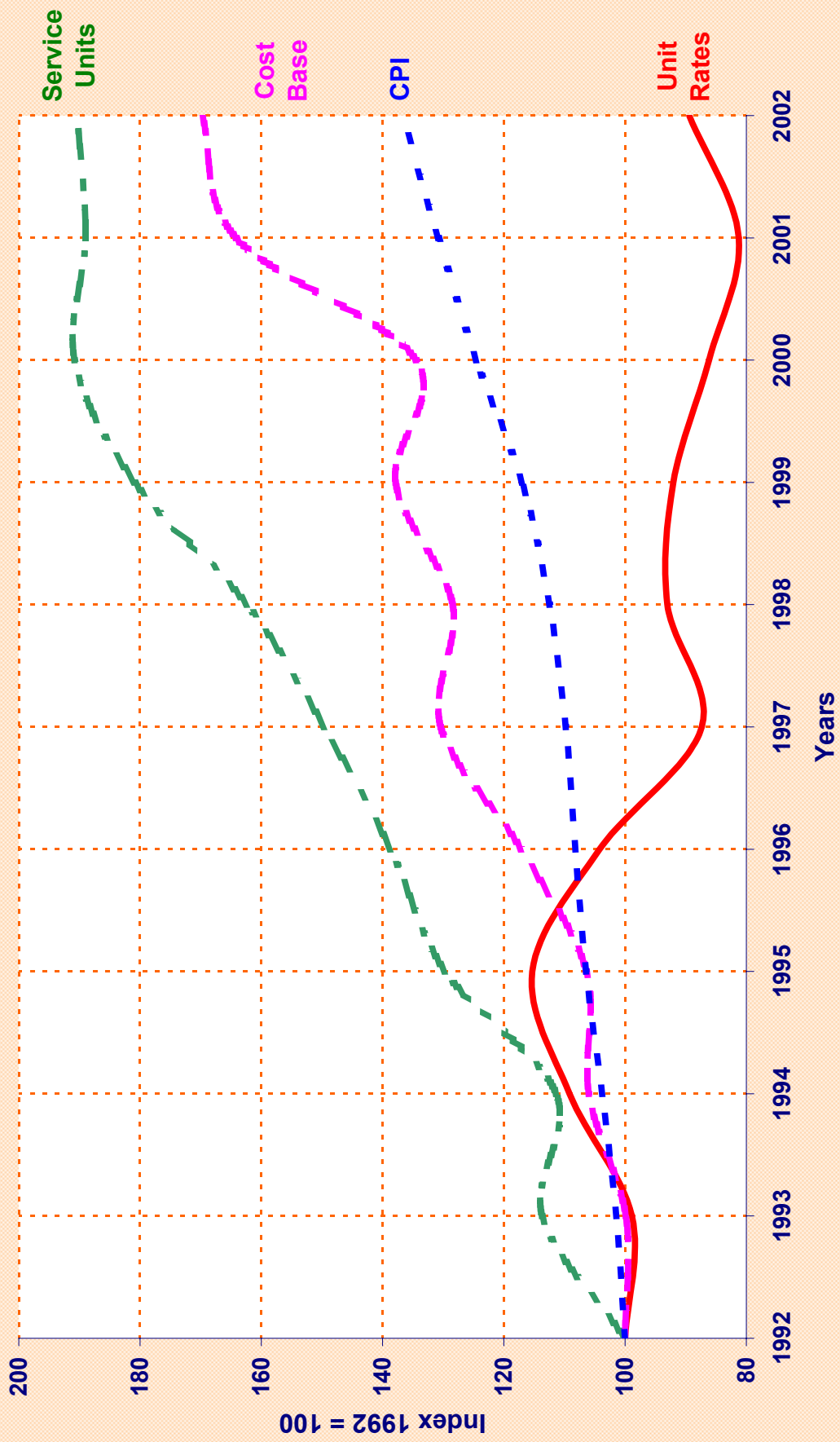
Chart	Year	Unit Rates	Svc.Units	Cost Base	CPI
Chrt90	1990	100	100	100	100
Chrt91	1991	100	100	100	100
Chrt92	1992	100	100	100	100
Chrt93	1993	99	114	100	101
Chrt94	1994	109	111	106	104
Chrt95	1995	115	130	106	106
Chrt96	1996	104	139	117	108
Chrt97	1997	87	150	130	110
Chrt98	1998	93	162	128	112
Chrt99	1999	92	181	138	117

EUROCONTROL Ireland

Calculation and Data Area

Chrt00	2000	86	191	134	125
Chrt01	2001	81	189	164	131
Chrt02	2002	89	190	170	137
Chrt03	2003	0	#####	182	143
Chrt04	2004	0	#####	209	149

En Route Charges Development 1993 - 2002



En Route Aviation Charges Database

EUROCONTROL								Ireland		
Table 1: Operational Data										
UNIT RATE DEVELOPMENT								June 2001 Data		
Year	99F	00F	01F	02F				00F	01F	02F
Unit Rates Charged (after adjustment, before administrative rate)										
Apprvd Jan. IEP	17.36	16.25	15.33	16.87				16.25	15.33	14.33
ECU / euro	22.04	20.63	19.46	21.42				20.63	19.46	18.19
% Chng prv. Yr	-1.1	(6.4)	(5.7)	10.1				(6.4)	(5.7)	(6.5)
Mid-yr Adj. euro	20.00									
% Chng vs. Jan.	(9.3)									
Year	99A	00A	01E	02F	03P1	04P2	05P3	00A	01E	02F
Unit Rates Calculated (from reported data)										
Currency: euro										
Before Adj.	20.39	18.85	23.24	23.85				21.28	21.67	20.43
After Adj.	20.32	18.23	21.67	21.42				20.57	20.18	18.19
% Chng prv. Yr		(10.3)	18.9	(1.2)				1.3	(1.9)	(9.9)
Currency: IEP										
Before Adj.	16.06	14.85	18.30	18.79				16.76	17.06	16.09
After Adj.	16.00	14.35	17.07	16.87				16.20	15.90	14.32
% Chng prv. Yr		(10.3)	18.9	(1.2)				1.3	(1.9)	(9.9)
ECONOMIC FACTORS										
Inflation Rate %	4.0	6.5	5.0	4.5	4.5	4.5	4.5	6.5	5.0	4.5
Interest Rate %	6.0	6.5	7.0	7.0	7.0	7.0	7.0	6.5	7.0	7.0
XRATE % Change	0.1	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
TRAFFIC								June 2001 Data		
Service Units (000)										
Total	2,545	2,674	2,649	2,668				2,374	2,794	2,898
% Chng prv. Yr	11.1	5.1	(0.9)	0.7				(6.7)	17.7	3.7
Exempt	50	42	42	42				42	44	46
% Chng prv. Yr	-2.0	(15.2)	(0.9)	0.7				(15.2)	4.5	3.7
Chargeable	2,495	2,631	2,607	2,626				2,331	2,750	2,852
% Chng prv. Yr	11.4	5.5	(0.9)	0.7				(6.5)	17.9	3.7
No. of Movements (000)										
IFR	444	467						467	507	530
% Chng prv. Yr	7.7	5.3						5.3	8.5	4.5
% Overflights	54.0	52.2						52.2	51.7	
% Int'l. Arr/Dep	41.7	42.7						42.7	43.0	
% Domestic	4.3	5.2						5.2	5.3	
% Military										
STAFF NUMBERS								June 2001 Data		
Total Staff										
% Chng prv. Yr										
ATCOs Enroute	212	228	246	251	258	261	269	228	246	251
% Chng prv. Yr	1.4	7.5	7.9	2.0	2.8	1.2	3.1	7.5	7.9	2.0
ATCOs Total	250	269	284	289	296	299	307	269	284	289
% Chng prv. Yr	2.5	7.6	5.6	1.8	2.4	1.0	2.7	7.6	5.6	1.8
Other Staff										
% Chng prv. Yr										
ATCO Enroute / Tot. Staff Ratio										

En Route Aviation Charges Database

EUROCONTROL								Ireland					
Table 2: Financial Data													
Year	99A	00A	01E	02F	03P1	04P2	05P3	00A	01E	02F			
NATIONAL COSTS BY MAIN FUNCTION								ECU/euro (000)			June 2001 Data		
Staff	21,727	23,117	30,830	31,254	28,921	29,305	30,550	23,117	29,830	27,932			
% Chng prv. Yr	7.1	6.4	33.4	1.4	(7.5)	1.3	4.2	6.4	29.0	(6.4)			
Op. Costs	21,846	19,066	22,625	24,262	22,660	23,783	24,795	19,066	22,625	21,858			
% Chng prv. Yr	16.7	(12.7)	18.7	7.2	(6.6)	5.0	4.3	(12.7)	18.7	(3.4)			
Depreciation	4,040	3,854	3,546	3,176	8,054	13,143	12,854	3,854	3,546	4,350			
% Chng prv. Yr	(18.6)	(4.6)	(8.0)	(10.4)	153.6	63.2	(2.2)	(4.6)	(8.0)	22.7			
Interest	1,264	1,065	1,249	1,255	3,260	6,217	5,711	1,065	1,249	1,244			
% Chng prv. Yr	(23.2)	(15.7)	17.3	0.5	159.8	90.7	(8.1)	(15.7)	17.3	(0.4)			
Other													
% Chng prv. Yr													
Total	48,877	47,102	58,250	59,947	62,895	72,448	73,910	47,102	57,250	55,384			
% Chng prv. Yr		(3.6)	23.7	2.9	4.9	15.2	2.0	(3.6)	21.5	(3.3)			
NATIONAL COSTS BY COST CENTERS								ECU/euro (000)			June 2001 Data		
ATM/CNS	29,835	29,788	39,493	38,691	41,546	49,112	49,713	29,788	38,493	35,609			
% Chng prv. Yr	1.0	(0.2)	32.6	(2.0)	7.4	18.2	1.2	(0.2)	29.2	(7.5)			
Training	4,094	4,178	4,150	5,042	4,642	5,434	5,543	4,178	4,150	4,079			
% Chng prv. Yr	54.9	2.1	(0.7)	21.5	(7.9)	17.1	2.0	2.1	(0.7)	(1.7)			
Tests													
% Chng prv. Yr													
Administration	7,119	5,329	6,061	7,103	7,354	7,896	8,252	5,329	6,061	6,891			
% Chng prv. Yr	18.9	(25.1)	13.7	17.2	3.5	7.4	4.5	(25.1)	13.7	13.7			
AIS	1,303	1,331	1,682	2,127	1,857	2,173	2,217	1,331	1,682	1,632			
% Chng prv. Yr	7.3	2.1	26.4	26.5	(12.7)	17.0	2.0	2.1	26.4	(3.0)			
MET	6,526	6,476	6,864	6,984	7,496	7,833	8,185	6,476	6,864	7,173			
% Chng prv. Yr	4.8	(0.8)	6.0	1.7	7.3	4.5	4.5	(0.8)	6.0	4.5			
SAR													
% Chng prv. Yr													
Other													
% Chng prv. Yr													
Irrecoverable VAT	125	200	250	250	250	300	300	125	200	250			
COST ADJUSTMENTS								ECU/euro (000)			June 2001 Data		
Revenue	54,755	54,351						54,351					
% Chng prv. Yr	18.1	(0.7)						(0.7)					
Nat. Cost Total	48,877	47,102	58,250	59,947	62,895	72,448	73,910	47,102	57,250	55,384			
% Chng prv. Yr	7.2	(3.6)	23.7	2.9	4.9	15.2	2.0	(3.6)	21.5	(3.3)			
Eurocontrol	3,152	3,445	3,606	3,821	4,339	4,511	4,602	3,445	3,606	3,938			
% Chng prv. Yr	4.9	9.3	4.7	6.0	13.6	4.0	2.0	9.3	4.7	9.2			
VFR & Circular	127	127	127	127				127	127	127			
Exempt	1,035	810	1,157	1,011				810	1,157	941			
Charg. Base	50,867	49,610	60,573	62,630	67,234	76,959	78,512	49,610	59,573	58,255			
% Chng prv. Yr	7.3	(2.5)	22.1	3.4	7.4	14.5	2.0	(2.5)	20.1	(2.2)			
Over/Under Rcvry	3,888	4,741						4,741					
Balance Yr. N-2	187	1,649	4,075	6,390				1,649	4,075	6,390			
Adjust. Base	50,680	47,962	56,498	56,240	67,234	76,959	78,512	47,962	55,498	51,865			
% Chng prv. Yr	13.4	(5.4)	17.8	(0.5)	19.5	14.5	2.0	(5.4)	15.7	(6.5)			
INVESTMENTS								ECU/euro (000)			June 2001 Data		
En Route													
Total													

TMA - Raw Data

Year for reports to be entered here (NOT cut & paste!):

Year (input)	1994	1995	1996	1997	1998	1999	2000	2001	2002	2003
Year Id (lookup)	A	A	A	A	A	E	F	P1	P2	P3
Xrate (looked up)	0	0	0.78756	0.78756	0.78756	0.78756	0.78756	0	0	0

Entry Code: **IE**
 Currency: **euro**
 Scale: **(000)**

Data Entry:

General and Economic Data											TMA
General	Yrld	YrGen	XRATE	XRTCH	URLoc	UREUR	URCalc	URVFR	CPI	IntRate	AREA
Gen94	A	1994				0.00	0.00		2.3	8.0	6,500
Gen95	A	1995				0.00	0.00		2.5	8.0	6,500
Gen96	A	1996	0.78756		1.55	1.97	1.62		1.7	8.0	6,500
Gen97	A	1997	0.78756	0.0	1.50	1.90	1.57		1.5	8.0	6,500
Gen98	A	1998	0.78756	0.0	1.28	1.62	1.23		2.4	8.0	6,500
Gen99	E	1999	0.78756	0.0	1.22	1.55	1.11		2.0	6.0	6,500
Gen00	F	2000	0.78756	0.0	1.02	1.30	0.00		2.0	6.5	6,500
Gen01	P1	2001			0.00		0.00				
Gen02	P2	2002			0.00		0.00				
Gen03	P3	2003			0.00		0.00				
Gen04		1904			0.00		0.00				
Gen05		1905			0.00		0.00				
Gen06		2006			0.00		0.00				
Gen07		2007			0.00		0.00				
Gen08		2008			0.00		0.00				
Gen09		2009			0.00		0.00				
Service Units (000)					Mvmnts (000)		MTOW				
Traffic	YrTra	SuTot	SuIFR	SuVFR	SuExmt	FitIFR	FitVFR	A_CTon			
Traf94	1994	0.0									
Traf95	1995	0.0									
Traf96	1996	0.0				83.8		4,801.2			
Traf97	1997	0.0				90.8		5,274.2			
Traf98	1998	0.0				97.7		5,836.0			
Traf99	1999	0.0				103.9		6,679.5			
Traf00	2000	0.0									
Traf01	2001	0.0									
Traf02	2002	0.0									
Traf03	2003	0.0									
Traf04	1904	0.0									
Traf05	1905	0.0									
Traf06	2006	0.0									
Traf07	2007	0.0									
Traf08	2008	0.0									
Traf09	2009	0.0									

TMA - Raw Data

Staff Numbers

Staff	YrSta	StaffTot	AtcoAPP	AtcoTWR	AtcoTot	OtStaff
Staf94	1994					
Staf95	1995					
Staf96	1996	649	19	16	260	354
Staf97	1997					
Staf98	1998					
Staf99	1999					
Staf00	2000					
Staf01	2001					
Staf02	2002					
Staf03	2003					
Staf04	1904					
Staf05	1905					
Staf06	2006					
Staf07	2007					
Staf08	2008					
Staf09	2009					

Cost Data - EUR (000)

Funcost	YrFun	Empl	OpCost	Depr	Interest	FunOth	FunTot	New Tot	Old Tot		
Fun94	1994						0.0				
Fun95	1995						0.0				
Fun96	1996	3,559.1	1,813.2	1,841.1	565.0	0.0	7,778.4				
Fun97	1997	3,961.6	1,996.0	1,797.9	507.9	0.0	8,263.5				
Fun98	1998	3,865.1	2,086.2	1,594.8	467.3	0.0	8,013.3				
Fun99	1999	4,122.0	2,260.0	1,471.0	299.0	0.0	8,152.0				
Fun00	2000	4,579.0	2,055.0	1,306.0	252.0	0.0	8,192.0				
Fun01	2001						0.0				
Fun02	2002						0.0				
Fun03	2003						0.0				
Fun04	1904						0.0				
Fun05	1905						0.0				
Fun06	2006	0.0	0.0	0.0	0.0	0.0	0.0				
Fun07	2007	0.0	0.0	0.0	0.0	0.0	0.0				
Fun08	2008	0.0	0.0	0.0	0.0	0.0	0.0				
Fun09	2009	0.0	0.0	0.0	0.0	0.0	0.0				
Actcost	YrAct	ATM	Train	Tests	Admin	AIS	MET	SAR	ActOt	ActTot	New Tot

TMA - Raw Data											
Act94	1994										0.0
Act95	1995										0.0
Act96	1996	6,380.4	218.4	0.0	1,179.6	0.0	0.0	0.0	0.0	7,778.4	
Act97	1997	6,647.1	213.3	0.0	1,403.1	0.0	0.0	0.0	0.0	8,263.5	
Act98	1998	6,581.1	0.0	0.0	1,432.3	0.0	0.0	0.0	0.0	8,013.3	
Act99	1999	6,568.0		0.0	1,584.0	0.0	0.0	0.0	0.0	8,152.0	
Act00	2000	6,947.0	0.0	0.0	1,245.0	0.0	0.0	0.0	0.0	8,192.0	
Act01	2001									0.0	
Act02	2002									0.0	
Act03	2003									0.0	
Act04	1904									0.0	
Act05	1905									0.0	
Act06	2006	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	
Act07	2007	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	
Act08	2008	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	
Act09	2009	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	
Adjcost	YrAdj	Rev	NatCost	ChgBas	AdjBase	VFRCst	ExmtCst	Proloss	Balance	InvTMA	InvTot
Adj94	1994		0.0	0.0	0.0			0.0			
Adj95	1995		0.0	0.0	0.0			0.0			
Adj96	1996	8,588.5	7,778.4	7,778.4	7,778.4			810.1	0.0		6,302
Adj97	1997	9,013.9	8,263.5	8,263.5	8,263.5			750.4	0.0		6,718
Adj98	1998	8,372.7	8,013.3	8,013.3	7,203.2			359.3	810.1		6,753
Adj99	1999	9,228.0	8,152.0	8,152.0	7,401.6			1,076.0	750.4		12,697
Adj00	2000	8,192.0	8,192.0	8,192.0	7,022.6			0.0	1,169.4		3,809
Adj01	2001			0.0	0.0			0.0	0.0		
Adj02	2002			0.0	0.0			0.0	0.0		
Adj03	2003			0.0	0.0			0.0	0.0		
Adj04	1904			0.0	0.0			0.0	0.0		
Adj05	1905			0.0	0.0			0.0	0.0		
Adj06	2006			0.0	0.0			0.0	0.0		
Adj07	2007			0.0	0.0			0.0	0.0		
Adj08	2008			0.0	0.0			0.0	0.0		
Adj09	2009			0.0	0.0			0.0	0.0		

Ireland										IAA
Table 1: Operational Data										
UNIT RATE DEVELOPMENT										
Year	94F	95F	96F	97F	98F	99F	00F			
IFR Unit Rates Approved (after adjustment)										
Currency: euro			1.97	1.90	1.62	1.55	1.30			
Currency: IEP			1.55	1.50	1.28	1.22	1.02			
% Chng prv. Yr				(3.2)	(15.0)	(4.3)	(16.1)			
Year	94A	95A	96A	97A	98A	99E	00F	01P1	02P2	03P3
IFR Unit Rates Calculated (from reported data)										
Currency: euro										
Before Adj.			1.62	1.57	1.37	1.22				
After Adj.			1.62	1.57	1.23	1.11				
% Chng prv. Yr				(3.3)	(21.2)	(10.2)				
Currency: IEP										
Before Adj.			1.28	1.23	1.08	0.96				
After Adj.			1.28	1.23	0.97	0.87				
% Chng prv. Yr				(3.3)	(21.2)	(10.2)				
ECONOMIC FACTORS (%changes over previous year)										
XRATE % Change										
Consumer Price	2.3	2.5	1.7	1.5	2.4	2.0	2.0			
Interest (Lending) R	8.0	8.0	8.0	8.0	8.0	6.0	6.5			
TRAFFIC										
Service Units (000)										
Total										
% Chng prv. Yr										
IFR										
% Chng prv. Yr										
No. of Movements (000)										
IFR			83.8	90.8	97.7	103.9				
% Chng prv. Yr				8.3	7.6	6.4				
VFR										
% Chng prv. Yr										
Landed A/C Tonnage (000)										
Total A/C Weight			4,801	5,274	5,836	6,680				
% Chng prv. Yr				9.9	10.7	14.5				
STAFF NUMBERS										
Total Staff			649							
% Chng prv. Yr										
ATCOs TMA/Appr.			19							
% Chng prv. Yr										
ATCOs Tower			16							
% Chng prv. Yr										
ATCOs Total			260							
% Chng prv. Yr										
Other Staff			354							
% Chng prv. Yr										
ATCO APP+TWR / Tot. Staff Ratio			1 : 18.5							



Approach and Aerodrome Control Database

Ireland										IAA
Table 2: Financial Data										
Year	94A	95A	96A	97A	98A	99E	00F	01P1	02P2	03P3
NATIONAL COSTS BY MAIN FUNCTION										euro (000)
Staff			3,559	3,962	3,865	4,122	4,579			
<i>% Chng prv. Yr</i>				11.3	(2.4)	6.6	11.1			
Op. Costs			1,813	1,996	2,086	2,260	2,055			
<i>% Chng prv. Yr</i>				10.1	4.5	8.3	(9.1)			
Depreciation			1,841	1,798	1,595	1,471	1,306			
<i>% Chng prv. Yr</i>				(2.3)	(11.3)	(7.8)	(11.2)			
Interest			565	508	467	299	252			
<i>% Chng prv. Yr</i>				(10.1)	(8.0)	(36.0)	(15.7)			
Other										
<i>% Chng prv. Yr</i>										
Total			7,778	8,263	8,013	8,152	8,192			
<i>% Chng prv. Yr</i>				6.2	(3.0)	1.7	0.5			
NATIONAL COSTS BY COST CENTERS										euro (000)
ATM/CNS			6,380	6,647	6,581	6,568	6,947			
<i>% Chng prv. Yr</i>				4.2	(1.0)	(0.2)	5.8			
Training			218	213						
<i>% Chng prv. Yr</i>				(2.3)						
Tests										
<i>% Chng prv. Yr</i>										
Administration			1,180	1,403	1,432	1,584	1,245			
<i>% Chng prv. Yr</i>				18.9	2.1	10.6	(21.4)			
AIS										
<i>% Chng prv. Yr</i>										
MET										
<i>% Chng prv. Yr</i>										
SAR										
<i>% Chng prv. Yr</i>										
Other										
<i>% Chng prv. Yr</i>										
COST ADJUSTMENTS										euro (000)
Revenue			8,589	9,014	8,373	9,228	8,192			
<i>% Chng prv. Yr</i>				5.0	(7.1)	10.2	(11.2)			
Nat. Cost Total			7,778	8,263	8,013	8,152	8,192			
<i>% Chng prv. Yr</i>				6.2	(3.0)	1.7	0.5			
VFR & Circular										
Exempt										
Charg. (IFR)			7,778	8,263	8,013	8,152	8,192			
<i>% Chng prv. Yr</i>				6.2	(3.0)	1.7	0.5			
Over/Under Rcvry			810	750	359	1,076	0			
Balance Yr. N-2					810	750	1,169			
Adjust. Base			7,778	8,263	7,203	7,402	7,023			
<i>% Chng prv. Yr</i>				6.2	(12.8)	2.8	(5.1)			
INVESTMENTS										euro (000)
TMA										
Total			6,302	6,718	6,753	12,697	3,809			

Table 3 - PERFORMANCE/PRODUCTIVITY INDICATORS (PPI):														Ireland - IAA					IE																					
Year	Total No. of Movements		Change over Previous Year		No. of IFR Movements		Change over Previous Year		No. of VFR Movements		Avg. Traffic Density - Mvmts/sq. Km		No. of ATCOS - Approach		No. of ATCOS - Tower		No. of IFR Mvmts per ATCO - APP		No. of IFR Mvmts per ATCO - TWR		IFR Unit Rate		Staff Costs		ATM/CNS Costs (total)		MET		AIS		Other (Tests+Train+Admin+SAR+O		Total Chargeable Cost							
	000's	%	000's	%	000's	%	000's	%	000's	000's	000's	%	8	9	10	11	12	13	euro	euro	euro	euro	euro	euro	euro	euro	euro	euro	euro	euro	euro	euro	euro	euro						
21/Dec/01	Col.	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19																				
1994 A																																								
1995 A																																								
1996 A	83.8		83.8						12.9	19	16	4,409	5,236	1.55	42.48	76.16																								
1997 A	99.1	18.3	90.8	8.3					14.0					1.50	43.65	73.23																								
1998 A	105.3	6.3	97.7	7.6					15.0					1.28	39.56	67.36																								
1999 E	110.3	4.7	103.9	6.4					16.0					1.22	39.66	63.20																								
2000 F														1.02																										
2001 P1														0.00																										
2002 P2														0.00																										
2003 P3														0.00																										
1904														0.00																										
1905														0.00																										
2006														0.00																										
2007														0.00																										
2008														0.00																										
2009														0.00																										