

**Before the
Irish Commission for Aviation Regulation**

**Comments of American Airlines, Inc.
Concerning
Updated Scheduling Information for Dublin Airport
For the Summer 2007 Season**

As a scheduled carrier to Dublin Airport, American Airlines, Inc. ("American") appreciates the opportunity to participate in this consultation process.

Q1. Given the most recent information from the Schedules Facilitator as set out above in Section 3 of this Notice, do interested parties disagree that this indicates an excess of demand over the Summer 2007 Wishlist?

A1. In order to maximize utilization of a specific aircraft through the entire day, an early, first departure of the day must have a high level of dependability. Sufficient airport infrastructure including ATC support must be in place.

According to the figures in Table 1, the declared departure capacity for DUB in the 0500 UTC hour is 31 while the stated demand is 33. The following two hours (0600 and 0700) indicate demand is less than the declared capacity.

If actual operations (after season start) match the current demand figures in Table 1, then we would disagree that "significant" delays will occur.

However, if past history at DUB reliably indicates current demand for departures in the 0500 UTC hour is understated and more than 33 departures in that hour will actually be scheduled when the season starts, we believe that knock-on delays could adversely impact DUB operations well into the morning period.

Q2. If so and given the most recent information from Jacobs Consulting as set out above at Section 3 of this Notice, do interested parties disagree with the Commission's tentative view, as set out in Section 4 of this Notice, that this excess of demand will give rise to significant delays at the airport from the Summer 2007 season and therefore requires coordination?

A2. American notes the short time for replying to this consultation and the timeline recommended in the IATA Worldwide Scheduling Guidelines (WSG) but agrees this notice is sufficient enough to seek a level of status change for DUB with the start of the IATA Summer 2007 season.

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If departures in the 0500 UTC hour are actually scheduled at 35 (4 above declared capacity) as shown in Table 3, then we believe there is cause for concern that the departure delay levels experienced will be unacceptable.

American firmly believes that market forces and limited constraints over scheduling is what the traveling public and shippers demand, but we also know they demand a reliable, dependable operating environment.

Respectfully submitted,

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