



Ref : G\HOC\CAR060207

Mr Kieran Baker
Commission for Aviation Regulation
Alexandra House
Earlsfort Terrace
Dublin 2

Head Office
Capital Place
120 Bath Road
Hayes
Middlesex UB3 5AN

Tel: 020 8564 0606
Fax: 020 8564 0691
Site: LONACXH
Email: james.cole@acl-uk.org

Sent by email

6 February 2007

Dear Kieran

ACL RESPONSE TO COMMISSION NOTICE 2/2007

The views of Airport Coordination Ltd (ACL), as the schedules facilitator of Dublin Airport, on the questions raised in the Commission's 1 February 2007 paper are as follows:

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

ACL agrees that Dublin Airport has demand for air services in the Summer 2007 season that significantly exceeds the airport's declared capacities, or 'wishlist'. The data in Table 2 shows that, across the 18-hour day (0500 – 2259 UTC), there are 6 hours where more than 5% of schedule requests have required timing adjustments by ACL to fit within the airport's declared capacity constraints. In the peak morning hours, the proportion of flights adjusted is 20% (0500 UTC) and 11% (0600 UTC).

It is ACL's view, as expressed in its 5 January 2007 response to the Commission's previous consultation on this topic, that this degree of excess demand is not '*...amenable to resolution by voluntary cooperation between air carriers...*' as required by the definition of a 'schedules facilitated' airport in Article 29(i) of the EU Slot Regulation 793/2004.

2. *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 for the Summer 2007 season and therefore requires coordination?*

The most recent Jacobs' delay modelling of current levels of Summer 2007 airline demand predicts an **average delay of 13.8 minutes**. This is greatly in excess of the 10 minute average delay criterion agreed as an 'acceptable' level of delay by the Dublin Airport Coordination Committee. Average delays in excess of the 10-minute level must be considered 'significant'.

ACL therefore agrees with the Commission's view that coordination for the Summer 2007 season is necessary.

ACL urges the Commission to publish its final decision as soon as possible and certainly by the 12 February 2007 date set.

The Commission should be aware that there is a European 'Schedules Optimisation Meeting' (SOM) relating to the Summer 2007 season being held on 13-14 February 2007 in Paris. The SOM is a mini scheduling conference which gives carriers a last opportunity to meet with coordinators and finalise their summer schedules. Continued uncertainty about the status of Dublin Airport during this meeting would be highly disruptive to airlines' schedule planning and to the European slot coordination process.

ACL is content for its submission to be published on the Commission's website.

Yours sincerely

A handwritten signature in black ink, appearing to read 'James Cole', written in a cursive style.

James Cole
Director of Coordination