

Mr Kieran Baker
Commission for Aviation Regulation
3rd Floor, Alexandra House
Earlsfort Terrace
Dublin 2



6 February 2007

Dear Kieran

RE: Commission Notice 02/2007 - consultation notice in respect of updated scheduling information for Dublin Airport for the Summer 2007 season

Thank you for the opportunity to comment on the updated information as set out in Section 3 of the Commission Notice.

The DAA views on the specific questions are as follows:

CAR Question 1

Given the most recent information from the Schedules Facilitator as set out in the consultation notice, do interested parties disagree that this indicates an excess of demand over the Summer 2007 Wishlist?

DAA's position on Question 1

DAA's view is that table 1 and table 2 of the Commission Notice clearly indicate that there is excess demand over the Summer 2007 Wishlist.

Table 1 of the notice clearly shows that in the 0500 hour demand for runway departures exceeds capacity by 5%. It is important to note that this table averages out the hourly utilisation over the 217 days of the summer season. This average figure disguises the fact that for the 4 peak months of the summer schedule (June to September) runway capacity in this hour is exceeded for 6 out of 7 days every week. Clearly demand is exceeding capacity and consistently exceeds capacity in the peak periods.

Table 2 of the notice clearly shows that in the 0500 and 0600 hours, which are the peak hours at Dublin Airport, demand exceeds capacity by 20% and 11% respectively. Demand also exceeds capacity in 13 other hours, as itemised in the table. Excess demand is clearly reported to be 6,149 flights for the summer season.

CAR Question 2

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

DAA's position on Question 2

DAA's view is that this excess of demand will give rise to significant delays at the airport for the Summer 2007 season and therefore Dublin Airport needs to be coordinated.

Table 3 of the Commission Notice clearly indicates that this excess of demand will give rise to significant delays at the airport for the Summer 2007 season. Jacobs Consulting has estimated that the impact of this additional demand will increase the average runway delay to 13.8 minutes. Extra delay on the runway will not only impact runway operations, but also apron operations as aircraft back up on the apron in the queue for the runway. The operators at Dublin Airport agreed on 4 October 2006 that the average delay criterion for runway operations must not exceed 10 minutes. It is clear therefore that Dublin Airport requires coordination for the Summer 2007 season so that runway operations can be planned within the agreed delay criterion.

I also note from the Commission paper that 'the Commission is of the view that outturn peak demand at Dublin Airport in Summer 2007 will be greater than that assumed in the current Summer 2007 Wishlist, that consequently, the airport will suffer significant delays and that the underlying reasons for such problems cannot be resolved in the short term. Accordingly, the Commission tends to the view that the situation, which will occur at Dublin Airport, will require coordination for the Summer 2007 season.'

The DAA welcomes the Commission's view in this regard and views coordination as essential to facilitate the journeys of around 23 million passengers through Dublin Airport this year. Without coordination there will be significant periods of congestion and disruption to the smooth operation of the airport.

As stated within our previous correspondence to you on 5 January, the DAA strongly requests the Commission to designate Dublin Airport as coordinated from the Summer 2007 season.

Yours sincerely



Robert Hilliard
Director – Dublin Airport