

Dr. Adrian Corcoran  
Director of Economics  
Commission for Aviation Regulation  
Earlsfort Terrace  
Dublin 2.

20th November 2020

Dear Adrian,

This document provides Aer Lingus' feedback on the proposed Commission for Aviation Regulation's work plan for review of the Irish Aviation Authority's revised RP3 Performance Plan (2020-2024).

### **Timeline of the Work Programme**

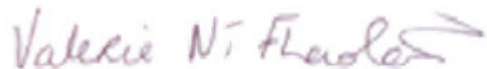
The timeline for consultation on the cost efficiency targets/ draft plan documents appears to be quite short – documents due for release at the end of July 2021 with responses due in August 2021. We would ask you to consider providing a longer timeframe than the minimum 3 weeks for interested parties to review the draft RP3 performance plan and formulate their responses. A timeline of 3 weeks during one of the peak months for annual leave and airline operations would be challenging. If the timeline could accommodate a 4-week, or preferably even a 5-week, period for review and response formulation that would be welcome, and potentially beneficial in improving the depth of review undertaken or increasing the number of responses.

### **Scope of the Work Programme**

Overall, we consider the scope of the work programme to be comprehensive, and we welcome the commitment to engage external expertise where appropriate. In particular, in making assessment on staff costs for 2020 we would ask the Commission to carefully consider if the IAA made optimal use of the government Covid-19 staff support scheme to support staff during 2020 and also to ensure that costs allowed for 2020 reflect only those costs which represent optimal use of the support scheme and the level of actual expenditure the IAA incurred during the periods that support was available.

Finally, we ask that the Commission, in reviewing the capex programme (and any increased opex associated with projects within the programme) , consider the ability of airlines to finance the final programme over the RP3 period particularly given the substantial negative impact of Covid-19 on the financial health of airlines. Consideration on timing of cost recovery should incorporate both the financeability of the IAA but also the ability of airlines to meet the sums which will fall due for recovery over each year of the regulatory period.

Yours sincerely,



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Valerie Ní Fhaoláin  
Infrastructure & Planning Manager