



The Guild of Air Traffic Control Officers

GUILD OF AIR TRAFFIC CONTROL OFFICERS

Mr Adam Exley
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GATCO
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Dear Sir/Madam

Thank you for the opportunity to comment on the NERL Price control review.

The Guild of Air Traffic Control Officers (GATCO) is a UK-wide professional organisation which promotes the highest standards in all aspects of air traffic management and is dedicated to the safety of all who travel or gain their livelihood in the air, with membership drawn from both civilian and military controllers. We are heavily involved in the work of the International Federation of Air Traffic Controllers' Associations (IFATCA), which includes representations to ICAO and SES, amongst others.

This letter constitutes our response to the consultation.

As you make note of, NERL is entitled to recover a significant proportion of the under-recovery leading to an increase in user charges. This, as you rightly point out, will damage any recovery in the aviation sector and will be counterproductive to the recovery of the aviation sector. We agree that the charges should be recovered over a longer period of time, as you suggest of 5-7 years. The recovery of the aviation sector will be reliant on having the staff, Air Traffic Controllers, ready to adapt to the increase in traffic. This will require not only the full contingent of controllers, but also the ability to retrain and revalidate licences which have lapsed during the pandemic.

The pandemic has highlighted how air navigation services are critical national infrastructure, and the unsuitability of the charging scheme that was never stress tested. With the current political situation, and the unprecedented downturn in traffic, this time would be best utilised to fundamentally look at the way air navigation services are funded. We feel there is a disparity between charges, where a subset of airspace users funds the entire air navigation service provision. In the traffic scenarios we find ourselves in now, other airspace users might be able to continue to operate without funding the system.

GATCO feel that taking more time to complete the review, allowing for the traffic to stabilise, will be a better approach. This will allow the summations and calculations to be based on a more stable and realistic demand forecast resulting in more certainty in the charges proposed and to also ensure the process is not unduly rushed.

Thank you for allowing us the time to respond to your consultation.

Yours Sincerely,

Adam Exley
VPP
GATCO