



Prospect¹ response to CAP 2245: Economic regulation of NATS (En Route) Plc: consultation on licence modifications to implement exceptional measures

In general, Prospect supports the themes discussed in CAP2245 and in particular the proposals set out in paragraph 3, which are in line with our position on related matters during the RP3i period.

Prospect also agrees with paragraph 4 that the TRS mechanism is not effectively disestablished for the NR23 period. However, should any change be made, it would ideally be taken at some point in the future when more is understood about the impact that the dramatic drops in traffic levels have on the charging scheme. It is only with hindsight and lessons learned that we will be able to truly understand the impact that any reform of the scheme will have on the industry.

Finally, it goes without saying that all stakeholders will quickly need clarity on what is considered by the term 'affordability of charges'. Prospect strongly encourages a holistic approach to any such definition (i.e. one that looks at all elements of affordability, including value for money, cost of ATM in an average ticket, what the consumer is actually willing to pay for an on-time service etc.). As explored in our other submissions on NR23, we have raised the important point that ATM costs within the average airline ticket price are in reality relatively small when compared with the costs that go towards other outgoings (fuel, airline staff costs etc.).

Prospect

29th October 2021

¹ Prospect is a trade union representing ATM workers in the UK. Prospect has 2100 members in the Air Traffic Control Officers' Branch, 800 members in the Air Traffic System Specialists' Branch, and over 250 ATM workers in other branches.