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4th October 2011

Your Reference: Consultation on NATS (En Route) plc (NERL) flight efficiency performance regime.

Dear Barbara

I write in response to your request for comments on the NERL 3DI flight efficiency metric. The Stakeholder event at CAA House on 5th September was extremely helpful in developing our understanding of the proposal and we would like to thank you for hosting that event.

In respect of the proposal we would comment as follows:

1. Adoption of a flight efficiency metric

It is highly desirable to have a metric which assesses the efficiency of lateral and vertical profiles provided by NATS.

2. Wider adoption of the metric

Given the international nature of the airline business, it would be beneficial to seek the adoption of the metric on a Europe wide basis. Entry point and level restrictions may often be driven by CFMU requirements, so adoption of the metric at a European level would give a more accurate assessment of overall flight efficiency and a driver for improvement.

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3. Vertical efficiency

The vertical efficiency is stated as being how closely the flight level allocated matches the level requested in the flight plan. In the event that NATS level cap a route, or an airway, and the airline subsequently file a flight plan in accordance with this restriction, then when that level is subsequently allocated by ATC it will be recorded as being highly efficient. Clearly, this is not factually the case. Consideration should be given as to how such flights are accounted for within the metric.

4. Lateral efficiency

GCD is the correct basis for measurement of lateral efficiency. However, instances exist where significant inefficient flight takes place in order to reach a UK FIR entry point due to the current UK airspace structure. Some of these could be alleviated by better integration with, for example, military airspace. Whilst we acknowledge that it would be difficult to integrate this quickly into the 3Di metric, we believe that consideration should be given in due course as to how to encourage better operational interfacing between NATS and military airspace.

5. Par value

The proposal to set the par value at a level worse than that currently being achieved appears contrary to best practice if the intention is to drive improvement.

6. Deadband

The deadband size of 4.5 units appears excessive. It is entirely reasonable that NATS wishes a degree of risk mitigation, but this size of deadband is likely to permit acceptance of significant service degradation without penalty. Conversely, at such a wide level it is unlikely to drive improvement. Therefore, a reduced deadband should be considered.

7. Transparency of data

The construction of the 3Di data is not presently transparent. Individual airlines should have access to their 3Di scores, to compare with the mean and with in house operational efficiency assessments.

A review of how descent and vectoring elements are quantified would also be beneficial as the transparency of these calculations is currently limited.

8. Olympics / Paralympics

During 2012, the total exclusion of the Olympic / Paralympic periods is likely to lead to a distortion in the metric, as the proposed exclusion period will effectively exclude the busiest operational period during the year.

9. Scope of annual review

The scope for the annual review appears overly restrictive for a new metric. The inclusion of a review of, as a minimum, deadband would appear prudent.

In conclusion, we welcome the adoption of an efficiency metric, but believe the issues listed should be considered and addressed if it is to be a credible metric which delivers real operational improvements.

If you require any further clarification on the above points then please don't hesitate to contact me.

Yours sincerely

M J Sutherland

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