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Reference: UK and Irish Performance Plan for Air Navigation Services, Consultation and Stakeholder Engagement

Dear Tom, Dear Matt,

Please find enclosed the Aer Lingus submission on the above mentioned consultation.

Consultation Questions:

1. Do you think that the general approach and level of ambition on scope and targets in the draft NPP is right? If not please explain why.

Response:

While we believe that the general approach is acceptable, we feel that the targets should be more challenging. We note that in the main the targets have been met or exceeded by the service providers in recent times – this indicates that the goals are not adequately demanding. In common with any goal oriented situation we believe that the goals should be achievable, but should

also represent a stretch for the service provider, and should be aligned closely with the joint objectives of the airline operators and their customers.

We are further concerned that the relevance of the goals is maintained in the context of the overall performance of the airspace management system, i.e. we are concerned that in the future, goals should not become so strictly pursued and interpreted that the context in which they are set is lost. For example, a situation should be avoided whereby a strict interpretation of the average delay minutes goal could mean that while the average is achieved - certain individual flights or regions are unduly negatively affected.

We also look forward to seeing the highest level of cooperation between the Irish and UK authorities to ensure the goals have real consequences when applied to the entire FAB.

2. Do you think the draft NPP demonstrates consistency with the EU performance targets? If not how should the plan be amended?

## Response:

While the overall direction of the implementation of the NPP is in-line with the EU targets, we are concerned specifically with the failure to set an adequately robust cost efficiency target. We note that the IATA representative body cited figures validated by the PRB which show a UK cost-effectiveness target of -1.1% per annum 2009 to 2014, as against the - 3.2% EU target.

3. Do you consider that the inclusion of the additional six UK-specific Safety Pls (S4-S9) will contribute to the overall safety performance of ANS in the UK?

## Response:

Aer Lingus considers Safety as paramount. Aer Lingus fully supports the safety measures included and will always support safety measures. We expect that all proposals will continue to be subject to consultation and agreement from the airlines.

4. Are there any components/aspects of the draft NPP that require more explanation?

As stated at the oral consultation meeting, Aer Lingus would like to see increased attention to the environmental (flight efficiency) targets. While these targets are not set for RP1, we assert that these are vital for the overall efficiency of the airspace management system. These environmental factors have a very significant impact on the overall economic situation of airlines and this is heightened due to the current high price of aviation fuel. Therefore, Aer

Lingus submit that there needs to be more stringent links between the CAA Airspace Change Process and the NPP targets.

5. Are there any specific key performance areas/indicators you would like to see captured by the NPP for RP2?

## Response:

We acknowledge that there is an element of a transition period for RP1, however we also know that the challenges faced by airlines in terms of efficiency and punctuality are very real now and during RP1. Therefore it is vital that the targets in RP1 are met and exceeded, and that those for RP2 be aligned to the airlines' objectives.

We also feel that Key Performance Indicators for ANSPs need to be simplified and clarified to show benefits to airline operators in real terms of cost, punctuality and efficiency.

6. Do you have any other comments on the Draft NPP.

## Response:

While UK and Irish authorities are working to improve the efficiency of their route networks from an airline operator point of view, we feel that the level of co-ordination and co-operation between them and with other ANSPs should maximised.

It is worthwhile noting that efficient use of airspace from an ANSP point of view is not necessarily the most efficient use of airspace from an airline operators point of view when planning full routes through a number of ANSP's airspace.

Improvements in airspace efficiency may only benefit a small number of users. We see at times that the main benefit has been to the ANSP itself rather than other users of the airspace.

We are concerned where changes in airspace are implemented without full coordination between all users of the total airspace. As an example, we are concerned that there is a bias in favour of long-haul traffic over short-haul European traffic, there is an urgent need to reduce the impact on Short-haul traffic.

In addition, with respect to financial performance, we echo the comments of others that there is a sense of disappointment with the UK and Irish costs. In the case of the UK, with the fact that despite the regulated process, the UK is still among the most expensive in Europe where the regulated process is not yet common. And in relation to Ireland we are concerned that while there are targeted reductions, these occur following recent significant increases.

In summary, Aer Lingus thoroughly support the intent of the Nation Performance Plan. However we strongly emphasise the need to ensure that the real interests of the airline users and their customers who demand cost efficiency and convenience in addition to the paramount pursuit of safety.

Yours Sincerely,

Ken Millar

Operations Contract Manager