

Heathrow Airport Limited Q6 service quality protocol – CAA determination

Background

1. On 13 February 2014, the CAA granted a licence to Heathrow Airport Limited (HAL) under the Civil Aviation Act 2012 (the Licence).¹
2. Condition F1 of the Licence requires HAL to consult and agree with stakeholders on one or more consultation protocols for Q6 and to publish them by 1 October 2014. These protocols must cover, but are not limited to, the following areas:
 - capital investment;
 - other regulated charges;
 - service quality regime;
 - traffic forecasts; and
 - operational resilience.
3. By 1 October 2014, HAL and the Heathrow Airline Community (the Community) had agreed all of the protocols set out in paragraph 2 above, with the exception of the service quality regime protocol. On 30 September 2014, as no agreement had been reached between the parties on this protocol HAL requested that the CAA make a determination on this matter, pursuant to Condition F1 of the Licence.²
4. The CAA gathered a range of evidence from the parties by conducting separate meetings with HAL and the Community and inviting written evidence from both parties. In coming to its determination, the CAA has carefully considered the views of all parties.

1 Economic regulation at Heathrow from April 2014: Notice granting the licence, CAP1151, available at <http://www.caa.co.uk/docs/33/CAP1151.pdf>, pp.105-106

2 Condition F1.7 of the Licence, available at <http://www.caa.co.uk/docs/33/CAP1151.pdf>, p.106

The CAA's determination

5. The CAA's determination is that the protocol detailed in Appendix A shall be adopted. This determination will take effect from 1 December 2014.
6. The CAA considers that its determination addresses the points made by the parties. To assess whether the determination has achieved its intended purpose, it is proposed that HAL, the Community and the CAA will attend a joint meeting to conduct a review six months from the date the determination takes effect.
7. The service quality protocol can be modified at any time by agreement between HAL and the Community.

Reasons for the CAA's decision

Overview

8. The CAA welcomes the joint effort of HAL and the Community to agree on the majority of the consultation protocols, including the Q6 Governance Structure and Joint Governance Principles.
9. On the service quality protocol, the CAA welcomes broad agreement between HAL and the Community that the **Terminal Community Meetings (TCMs)**, previously known as Terminal AOCAs) are best placed to handle operational issues, and the **Passenger Experience Board (PEB)** should focus on strategic level discussions of the passenger journey.
10. On the handling of **service quality rebates and bonuses exclusion requests (SQRB exclusion requests or SERs)**, both parties agreed that the PEB, as a high-level strategic body, should review decisions at regular intervals to ensure consistency, and should not consider the details of the SERs.
11. However, HAL and the Community were unable to agree on where and how SERs should be handled in the governance structure lower than the PEB level.

The parties' views

12. HAL argued that all SERs should be agreed by the TCMs. HAL's principal arguments were that:

- TCMs should agree all SERs alongside other operational decisions. This would result in a more efficient and coordinated approach, ensuring that administrative and licensing procedures did not hold up operational works that were required for the best interests of passengers;
 - both the operational and licensing decisions should be made before the commencement of the works. This would avoid the risk of the SERs being declined, which could require changes to work plans;
 - the criteria for exclusions set out in the Licence are clear and unambiguous, so should be straightforward to assess; and
 - any disputes could be sent to the PEB for resolution and, in any case, the PEB would review the TCM's decisions on regulatory matters on a regular basis to ensure consistency.
13. The Community argued that it is necessary to have a separate group to review the TCM's decisions on SERs. The Community put forward this final proposal after two earlier proposals submitted in October to HAL had been rejected. Its main arguments were that:
- the TCMs are not the appropriate forum to agree licensing issues, as they are made up of airline operations managers who do not have the expertise in regulatory and legal matters;
 - using five TCMs would lead to an inconsistent approach and would not deal adequately with cross-terminal works and other issues. In addition, it is not practical for the Community to provide regulatory expertise at each of the five TCMs to manage these issues; and
 - the SERs are not all as straightforward as HAL suggested and some would need more consideration by regulatory experts

The CAA's analysis

SQRB exclusion requests/SERs

14. The CAA considers that decisions on operations and SERs should be made at the same time or as close to each other as possible, so that HAL can obtain greater certainty on the effect of essential maintenance works on its service performance, which facilitates such works to proceed in an efficient manner. The CAA notes HAL's preference of making decisions on SERs quickly to avoid any

unnecessary delays in essential works and agrees that discussions about SERs should not unduly delay operational decisions intended to benefit passengers.

15. If there are challenges in reaching decisions on operations and SERs at the same time or as close to each other as possible, the CAA considers that essential works should proceed regardless of whether SQRB exclusions are secured, although it recognises that not having such a decision prior to the start of the works might pose uncertainty and risks to HAL. However, the risk of having SERs declined should be low if they clearly fulfil the set criteria in the Licence.³
16. Risks should also be minimised if the SERs are clearly documented. To that end, the CAA welcomes stakeholders' efforts to develop a standard form for SERs. A standard form, if properly used, should provide all the necessary details and help to expedite the process of handling SERs. The standard form in the CAA's determination should be used for presenting all SERs. It is built on the versions submitted by HAL and the Community, and should capture the details of SERs required for efficient decision making.
17. The CAA considers that in most cases the handling of SERs should be clear and straightforward, especially when presented in the standard form as proposed both by HAL and the Community. Members of the TCMs are likely to require some time to gain knowledge on the relevant Licence conditions relating to SERs. However, after being properly briefed and trained, TCMs should be able to make decisions in the majority of cases. The CAA welcomes HAL's intention to work with the CAA, Heathrow Airline Operators Committee (AOC) and Chairs of the TCMs to prepare the TCMs for making decisions on SERs.
18. Nevertheless, the CAA also recognises that there may be some less straightforward SERs that require closer scrutiny. The CAA also considers that TCMs are not the correct forum to make decisions on SERs outside of terminals (i.e. control posts and aerodrome congestion term).

³ As set out in paragraphs 2.27 and 2.28 of Schedule 1 to the Licence, available at <http://www.caa.co.uk/docs/33/CAP1151.pdf>, pp.116-119

19. The CAA considers that there should be a **Technical Review Forum (TRF)**. Members of the TRF should consist of representatives of HAL, the AOC, airlines/alliances, Chairs/Deputy Chairs of TCMs, and other personnel as appropriate. The functions of TRF are both to handle more complicated terminal-specific SERs and to deal with non-terminal-specific SERs, among other SQRB issues in the Licence. The CAA considers that the TRF should provide valuable experience and flexibility in handling SERs.
20. For terminal-specific SERs, HAL can choose to submit them to either the TCM of the relevant terminal or the TRF as it sees fit. The different meeting dates of the TCMs and the TRF should offer more than one opportunity for decisions on SERs in a month. This flexibility should facilitate closer decision times on operations and SERs and avoid unnecessary delays.
21. The TCMs can approve or decline a terminal-specific SER, in which case the SER in question should be recorded by the PEB. The TCMs can also decide that further deliberation is required in order to make a decision, in which case the SER in question should be referred to TRF for handling. The TRF should meet seven to ten days after the last TCM meeting is held, so that it can make decisions on terminal-specific SERs referred by TCMs as quickly as possible.
22. The TRF is not an appeal body for decisions made by the TCMs. Approvals or rejections at TCMs cannot be overturned at the TRF. Over time, as members of TCMs develop their understanding of the parameters of the SQRB, the TRF may have a less prominent role in handling terminal-specific SERs.
23. Non-terminal-specific SERs should be presented to the TRF directly. The TRF can approve or decline an SER, in which case the SER in question should be recorded by the PEB.
24. For SERs declined by a TCM and the TRF, HAL can choose to amend and re-submit the request to either the relevant TCM or the TRF, or may withdraw the request as it sees fit.
25. The CAA considers that streamlining the decision making of SERs is in the interest of passengers, and this would be facilitated by early presentation of the SERs to the TCMs and the TRF. In particular, members of TCMs with limited regulatory experience should be in a

better position to make decisions on SERs if they can obtain key information in advance of the meetings. The CAA has therefore determined that SERs should be presented seven calendar days in advance of the meetings in which discussions are to be held.

26. The CAA acknowledges the Community's concerns that decisions on SERs may be inconsistent if they are made by different TCMs. The CAA considers that as the SQRB scheme was designed for Heathrow Airport as a whole, it is important that a consistent approach is taken in licence implementation. The CAA expects that the TRF should have a more important role in achieving consistency initially, and the TCMs should increasingly be able to achieve consistency as they gain knowledge and experience in interpreting the Licence. This will be one of the key areas for discussion at the six month review.
27. The Community proposed that all SERs presented to the TCMs should be reviewed by an Exclusion Review Meeting. The CAA considers that this process could be overly burdensome since many SERs will clearly fulfil the Licence requirements.⁴ The TRF should provide sufficient oversight of the more complicated SERs without imposing unnecessary burdens on HAL and the Community.
28. The CAA notes the Community's concern about providing sufficient regulatory resource at multiple TCM meetings should TCM become the forum for making decisions on SERs. The CAA, while acknowledging this concern, considers that this appears to apply to only a small number of airlines, as most airlines at Heathrow operate at one terminal and small airlines can be represented by the AOC and/or the alliance (if they belong to one). The CAA considers that the role of the TRF and TCM offers a balance between the airlines' resource levels and the effective handling of SERs.
29. The CAA acknowledges that the addition of the TRF would require a minor change to the Q6 Governance Structure. The CAA considers that the TRF is essential in handling SERs and in dealing with other technical SQRB issues (see next section), and that the TRF is not at odds with the principle of 'a simpler/streamlined structure' in the Joint Governance Principles.

⁴ As set out in paragraphs 2.27 and 2.28 of Schedule 1 to the Licence, available at <http://www.caa.co.uk/docs/33/CAP1151.pdf>, pp.116-119

Other areas in the SQRB scheme

30. The CAA considers that there are technical aspects related to the Statement of Standards, Rebates and Bonuses in Schedule 1 to the Licence that do not appear to fit the terms of reference of either the TCMs or the PEB. These issues include, but are not limited to, elements not tied to particular terminals, self-modification of the Licence⁵, and issues that span across multiple terminals. The CAA considers that the TRF is a suitable forum to handle these issues.

5 As set out in Condition D1.6 to D1.8 of the Licence, available at <http://www.caa.co.uk/docs/33/CAP1151.pdf>, p.94

APPENDIX A

The CAA's determination

Introduction

- A1 The purpose of this protocol is to describe how HAL will consult relevant parties on the service quality rebates and bonuses (SQRB) scheme as set out in Schedule 1 to the Licence.⁶
- A2 The Licence is the vehicle by which the CAA imposes obligations on the airport in relation to topics such as price, service quality and operational resilience.
- A3 This protocol sets out how HAL will satisfy the service quality conditions in F1.1(iv) of the Licence. The consultation condition requires HAL to consult relevant parties on the SQRB in condition D1 of the Licence, including the Statement of Standards, Rebates and Bonuses in Schedule 1 to the Licence.
- A4 The terms of this protocol are effective from 1 December 2014. In consultation with relevant parties, this protocol should be reviewed from time to time, and updated if necessary.

Scope and licence obligations

- A5 The purpose of condition D1 of the Licence is to ensure that Heathrow Airport complies with the Statement of Standards, Rebates and Bonuses (the Statement) as set out in Schedule 1 to the Licence.
- A6 HAL must maintain records of the actual service quality rebates and bonuses in such form and detail that their performance can be independently audited at HAL's cost by independent auditors appointed by the CAA, against the standards set out in the Statement.
- A7 All modifications to the Statement must comply with Conditions D1.6 to D1.10 of the Licence, which specify that the CAA may by notice modify the Statement with immediate effect where there is written

⁶ Economic regulation at Heathrow from April 2014: Notice granting the licence, CAP1151, available at <http://www.caa.co.uk/docs/33/CAP1151.pdf>, pp.107-162

agreement between HAL and the AOC. Where agreement cannot be reached between these parties, the CAA will act as an arbiter on proposed changes.

Consultation and Governance

- A8 HAL will report and consult on the components of the SQRB scheme as set out in Schedule 1 to the Licence. Reporting will be in the form of a standing agenda item at the monthly Terminal Community Meetings (TCMs, previously known as Terminal AOCAs). The TCMs are the forum where HAL and the Heathrow Airline Community (the Community) work together in the interests of passengers to consider passenger experience at the terminal. It is the forum where the best interests of passengers can be considered in line with the provisions of SQRB. The details of TCMs are in Table 1.
- A9 HAL will work with the CAA, AOC and Chairs of the TCMs to create a simple instruction and briefing document and to offer appropriate training to enable decision making and ensure the provisions in the Licence are adhered to. Over time, the AOC Chairs and Deputy Chairs should develop and enhance their understanding of the parameters of the SQRB in order to confidently take responsibility for making decisions on straightforward and terminal-specific SQRB exclusion requests (SERs).
- A10 The Technical Review Forum (TRF) will review SERs referred to it by the TCMs and those presented to it directly by HAL, and process other technical aspects of service quality issues, including agreeing changes to the Statement under Condition D1 of the Licence. The details of the TRF are in Table 2.
- A11 The Passenger Experience Board (PEB) will provide strategic direction of the passenger experience. The CAA would welcome an early agreement between HAL and the Community on the terms of reference of the PEB. The PEB will review bi-annually the views of the TCMs and the TRF on the workings and implementation of this protocol.

SQRB exclusion requests (SERs)

- A12 All SERs should be presented in the standard form in Table 3 seven calendar days in advance of the (TCM or TRF) meetings at which

discussions will be held. All SERs shall be submitted in accordance to paragraphs 2.27 and 2.28 of Schedule 1 to the Licence.

- A13 There are two types of SERs – those related to terminal services⁷ and those that are not directly related to a particular terminal. Terminal-specific SERs should be submitted to the respective TCMs or the TRF. Non-terminal-specific SERs should be submitted to the TRF.
- A14 The TCMs should refer terminal-specific SERs to the TRF where they consider that further deliberation is required in order to make a decision, and not when they decide to decline the SERs. The TRF is not an appeal body for decisions made by the TCMs. Approvals or rejections at TCMs cannot be overturned at the TRF.
- A15 For SERs declined by a TCM and the TRF, HAL can choose to amend and re-submit the request to either the relevant TCM or the TRF, or may withdraw the request as it sees fit.
- A16 HAL shall maintain a log of all SQRB exclusions and deadbanding activity.⁸ These are to be shared as a monthly standing agenda item at the TCMs, the TRF and the PEB.

General principles on SERs

- A17 SQRB exclusions should follow the following principles:
- Work that is in the passenger interest agreed at the terminal level should not be withheld on the basis of requiring a decision on SERs.
 - Decisions on SERs should be made in a transparent, fair and consistent manner. SERs should be granted when they fall within the criteria as set out in the Licence and not otherwise.
 - Stakeholders should work together and commit to provide suitable operational, strategic and regulatory resources at all levels to expedite the decision-making process to passengers' benefit.

7 As set out in Table 1a to Table 5d of Schedule 1 to the Licence, available at <http://www.caa.co.uk/docs/33/CAP1151.pdf>, pp.136-155

8 Deadband periods are defined in paragraphs 6.3(g) and 6.3 (h) of Schedule 1 to the Licence, available at <http://www.caa.co.uk/docs/33/CAP1151.pdf>, p.135

Table 1 Terminal Community Meeting (TCM)

Terminal Community Meeting (TCM)	
Meeting	On the third calendar week of every month
Chair	A representative from HAL
Secretary	A representative from HAL
Standing members	Representatives from the Heathrow Operations Team (terminal, security, retail, facilities and baggage), TCM Chair, airline/alliance representatives, AOC general secretary/deputy general secretary, Border Force, Police, Omniserve and other personnel as appropriate
Terms of reference	1 To review the operating performance and data for the service quality rebates and bonuses (SQRB) scheme
	2 To confirm upcoming schedules, events and activities that will impact the operation
	3 All development projects related to the terminal must be presented for formal consultation through the Stakeholder Group
	4 To process and agree on terminal-specific SQRB exclusion requests (SERs) presented to the TCM meeting
	5 To process and agree on the scope, timing and other operational details of the works to be carried out during the deadband periods as defined in the Licence
Agenda	1 Review minutes and actions from previous meetings
	2 Forward look: forecasts and key events
	3 Operations performance review: (i) critical KPIs (ii) key activities coming up (iii) requests/actions in these areas: service quality, terminal operations including special assistance, security, facilities and engineering, baggage, retail and border force
	4 Review terminal-specific SERs
	5 Any other business

Terminal Community Meeting (TCM) – continued	
Key roles and responsibility	Chair: Ensures meetings follow due process, issues are dealt with promptly, fairly and openly. Seeks consensus among members.
	Secretary: Arranges meetings, issues papers, and takes and issues meeting minutes.
	HAL representatives: Look after the interests of terminal operations.
	AOC representatives: Represent the interests of the AOC/aligned and non-aligned airlines.
	Airline/alliance representatives: Represent the interests of their own airline, their alliance, and be mindful of the impact of their decisions on the wider airline community at Heathrow.
	Non-airline members: Represent the interests of their own organisation and be mindful of the impact of their decisions on the wider community at Heathrow.
	All members: Members have a collective responsibility to attend and contribute to TCM meetings, and agree to abide by its decisions, unless a disagreement is formally registered with the Chair.
Protocol	1 The TCM shall aim to operate by consensus, in the event of non-consensus, chair to be under an obligation to identify where issues are not unanimous in reporting to PEB.
	2 Deputies can attend where necessary but members to ensure they are fully briefed in advance. All members to submit names of nominated deputy.
Logistics / Ethics	1 Set dates for future meetings – having regard for people travelling from afar.
	2 Minutes shall be circulated within seven calendar days of the meeting.
	3 Agendas, papers and all SERs (presented on the standard form) shall be circulated at least seven calendar days before the meeting.
	4 Establish milestone plan to manage workplan.
	5 Meetings held at respective terminals
Quorum for processing terminal-specific SERs	One HAL representative One AOC representative Members representing two airlines

Table 2 Technical Review Forum (TRF)

Technical Review Forum (TRF)	
Meeting	When needed, on the fourth calendar week of every month
Chair	A representative from HAL
Secretary	A representative from HAL
Standing members	Representatives from HAL, TCM Chair, airline/alliance representatives, AOC general secretary/deputy general secretary and other personnel as appropriate
Terms of reference	1 To review (1) terminal-specific SQRB exclusion requests (SERs) referred to it by TCMs or submitted directly to it and (2) non-terminal-specific SERs
	2 To handle technical aspects of service quality issues, such as licence modification ⁹ , assets/works that are outside of terminals or span across multiple terminals
Agenda	1 Review minutes and actions from previous meeting
	2 Review SERs
	3 Technical aspects of service quality issues
	4 Any other business
Key roles and responsibility	Chair: Ensures meetings follow due process, issues are dealt with promptly, fairly and openly. Seeks consensus among members.
	Secretary: Arranges meetings, issues papers, and takes and issues meeting minutes.
	HAL representatives: Look after the interests of terminal operations.
	AOC representatives: Represent the interests of the AOC/aligned and non-aligned airlines.
	Airline/alliance representatives: Represent the interests of their own airline, their alliance, and be mindful of the impact of their decisions on the wider airline community at Heathrow.
	All members: Members have a collective responsibility to attend and contribute to TRF meetings, and agree to abide by its decisions, unless a disagreement is formally registered with the Chair.

9 As set out in Condition D1.6 to D1.8 of the Licence, available at <http://www.caa.co.uk/docs/33/CAP1151.pdf>, p.94

Technical Review Forum (TRF) – continued		
Protocol	1	The TRF shall aim to operate by consensus, in the event of non-consensus, chair to be under an obligation to identify where issues are not unanimous in reporting to PEB.
	2	Deputies can attend where necessary but members to ensure they are fully briefed in advance. All members to submit names of nominated deputy.
Logistics / Ethics	1	Set dates for future meetings – having regard for people travelling from afar.
	2	Minutes shall be circulated within seven calendar days of the meeting.
	3	Agendas, papers and all SERs (presented on the standard form) shall be circulated at least seven calendar days before the meeting.
	4	Establish milestone plan to manage workplan.
	5	Meetings held in HAL offices usually at Compass Centre but may be elsewhere if rooms are not available
Quorum		<p>One HAL representative</p> <p>One AOC representative</p> <p>Members representing a minimum of two base airlines</p> <p>Member representing another airline/alliance</p>

Table 3 Standard Form for service quality rebates and bonuses exclusion requests (SQRB exclusion requests or SERs)

Standard Form for SQRB exclusion requests – Guidance Notes	
1	This form should be used for the provision of information required for each SQRB exclusion request (SER) in accordance to the Heathrow Airport Licence. ¹⁰
2	This form should be completed sequentially.
3	The completed form should be distributed to all members seven calendar days prior to the meeting of the respective Terminal Community Meeting (TCM) or the Technical Review Forum (TRF).
4	An SQRB exclusion is not required for Heathrow Airport to commence the activities for which it is submitting an SER. The decision to commence or postpone any activities for which HAL is seeking an SQRB exclusion is a decision for HAL to make. The role of TCM or the TRF is simply to consider if an SQRB exclusion is warranted.
5	Terminal-specific SERs may be presented to either the respective TCM or the TRF. The TCM may decide to refer SERs to the TRF for review. Non-terminal-specific SERs shall be presented to the TRF.

Standard Form for SQRB exclusion requests – Part A	
Details of the request	
A1	SQRB Element <i>Insert the SQRB element for which an exclusion is being sought</i>
A2	Reason for exclusion proposal <i>Set out the management reasons for the exclusion proposal</i>
A3	Any impact of not undertaking activity for which exclusion is being proposed <i>Set out any impact on the passenger experience and/or airline operations of not undertaking the work for which the exclusion is being proposed</i>
A4	Regulatory basis for the exclusion proposal <i>Set out the criteria, from the CAA Q6 decision list of factors under which it may be appropriate for an SQRB element to be excluded, under which HAL is proposing the exclusion</i>

¹⁰ As set out in paragraphs 2.27 and 2.28 of Schedule 1 to the Licence, available at <http://www.caa.co.uk/docs/33/CAP1151.pdf>, pp.116-119

Standard Form for SQRB exclusion requests – Part A (continued)		
Details of the request		
A5	Period of exclusion proposal (inclusive of both start date and end dates)	
	<i>Insert proposed exclusion start date</i>	<i>Insert proposed exclusion end date</i>
A6	Any impact of the exclusion proposal on passenger experience and/or airline operations	
	<i>Set out any impact on the experience of passengers and/or airline aircraft operations of the exclusion proposal</i>	
A7	Mitigation of any impact on passenger experience and/or airline operations	
	<i>Set out how HAL will mitigate any impact of the exclusion proposal on passenger experience and/or airline operations</i>	
A8	HAL proposer	
	Name	Signature
	<i>Name</i>	<i>Signature</i>
A9	HAL – Customer Relation and Service Director Sponsor	
	Name	Signature
	<i>Name</i>	<i>Signature</i>
A10	SQRB exclusion request to be presented to	
	TCM (Go to Part B)	TRF (Go to Part C)
	<i>Tick as appropriate and insert terminal</i>	<i>Tick as appropriate</i>

Standard Form for SQRB exclusion requests – Part B			
Discussion at the Terminal Community Meeting (TCM)			
B1	Date of presentation/discussion		
	<i>Insert date of presentation</i>	<i>Insert date of discussion</i>	
B2	Views/comments on the exclusion proposal and mitigation proposed by HAL		
	<i>Insert text</i>		
B3	Decision on the exclusion proposed by HAL		
	Approved	Declined	Referred to the TRF
	<i>Tick as appropriate</i>	<i>Tick as appropriate</i>	<i>Tick as appropriate</i>
B4	Any additional information/reasons or conditions associated with the decision		
	<i>Insert text</i>		
B5	TCM Chair/Deputy Chair		
	Name	Signature	Date
	<i>Name</i>	<i>Signature</i>	<i>Date</i>
From the answer in B3, for an SQRB exclusion request that is			
Approved or Declined (Go to Part D)		Referred to the TRF (Go to Part C)	

Standard Form for SQRB exclusion requests – Part C			
Discussion at the Technical Review Forum (TRF)			
C1	Date of presentation/discussion		
	<i>Insert date of presentation</i>	<i>Insert date of discussion</i>	
C2	Views/comments on the exclusion proposal and mitigation proposed by HAL		
	<i>Insert text</i>		
C3	Decision on the exclusion proposed by HAL		
	Approved	Declined	
	<i>Tick as appropriate</i>	<i>Tick as appropriate</i>	
C4	Any additional information/reasons or conditions associated with the decision		
	<i>Insert text</i>		
C5	TRF Chair/Deputy Chair		
	Name	Signature	Date
	<i>Name</i>	<i>Signature</i>	<i>Date</i>
Go to Part D			

Standard Form for SQRB exclusion requests – Part D			
Form acknowledgement of the Passenger Experience Board			
D1	Date of discussion at PEB		
	<i>Insert date of discussion</i>		
D2	Views/comments on the exclusion proposal and mitigation proposed by HAL		
	<i>Insert text</i>		
D3	Any additional information/reasons or conditions associated with the decision		
	<i>Insert text</i>		
D4	PEB Chair – HAL		
	Name	Signature	Date
	<i>Name</i>	<i>Signature</i>	<i>Date</i>
D5	PEB Chair – Heathrow airline community		
	Name	Signature	Date
	<i>Name</i>	<i>Signature</i>	<i>Date</i>