

Lufthansa Group – Response to CAP3250

Dear Economic Regulation & Competition Policy team,
thank you very much for the opportunity to provide our views on your draft advice to the Secretary of State in relation with the Traffic Distribution Rules 1991 (TDRs 1991).

a) our draft advice to the Secretary of State that the 1991 TDRs should be revoked;

Lufthansa Group (incl. Lufthansa Cargo but also several passenger airlines) **strongly supports UK CAA draft advice** to revoke the discriminating TDRs 1991.

b) the approach to implementation, including whether revocation of the 1991 TDRs should take effect immediately or following a suitable transition period;

Lufthansa Group is calling for the **TDRs 1991 to be revoked immediately** or at least as soon as possible. We agree that the actual impact will be limited because slot availability is very low especially at London Heathrow (LHR), but therefore a transition period is also not necessary to adapt.

The revocation of a discriminating local rule that contravenes the current UK Slot Regulation and the Worldwide Airport Slot Guidelines (WASG) should be implemented independently of any legislative process aimed at further developing the UK Slot Regulation.

(In our view, the current UK Slot Regulation is fit for purpose, time proven and compatible with the WASG. Any diversion from the globally harmonized standard of slot allocation (WASG) must be avoided.)

c) whether condition C4 in HAL's Licence continues to be necessary or whether an alternative mechanism, ensuring that whole-plane cargo services continue to benefit from appropriate price control arrangements, would be preferable.

Lufthansa Group recommends that **Condition C4 in HAL's Licence should be maintained.**

We trust that our views are helpful and would be pleased to provide any further clarification or engage in additional discussions if needed.