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**Consumer and Markets**  
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Luton, October 31, 2025

**easyJet's response to CAA Consultation on NR28 Timetable and Constructive Engagement (CAP3174)**

Dear Mr Crook,

easyJet welcomes the opportunity to contribute to the CAA's consultation on the NR28 timetable and constructive engagement framework. This response outlines our views on the proposed regulatory timeline, highlights key concerns regarding interim pricing and investment risks, and sets out recommendations to ensure a balanced and resilient approach that reflects the interests of users and stakeholders.

The NR28 price control review represents an important opportunity to address longstanding challenges in the regulation of NERL and to pursue improvements in service quality and resilience. Under the current timeline, the Final Decision would be taken eight months after the start of the NR28 period, requiring interim pricing based on Initial Proposals. We acknowledge the CAA's efforts to minimise overlap between the NR28 and H8 price control reviews. easyJet would be prepared to support a six-year regulatory period, provided that robust safeguards for users are firmly embedded to ensure a smooth evolution of charges and avoid price shocks.

Nevertheless, even with a six-year period, it will remain essential to strike the right balance between mitigating delays and avoiding the risk of rushed, incomplete interim pricing decisions. While we appreciate the need to reduce overlaps and ease resource pressures, we remain concerned about the implications of the proposed timeline and the potential risks of delay in finalising the NR28 price control, particularly in relation to investment, project delivery, and wider reform opportunities. We therefore suggest that any regulatory approach for NR28 should explicitly recognise these risks and incorporate concrete measures to mitigate them.

We emphasise the importance of establishing a robust, transparent, and timely process, underpinned by a clear method statement that defines objectives and priorities. This should include meaningful user engagement and regular independent scrutiny. We also highlighted the need to ensure that the CAA is adequately resourced to conduct thorough assessments and provide effective oversight. We believe it is equally important that the NR28 plan includes a comprehensive

reconciliation of NR23 delivery and fully incorporates the lessons learned from the current regulatory period.

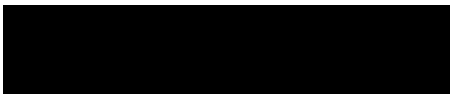
- A rigorous assessment of whether NR23 has achieved its core objectives will be essential to inform the formulation of objectives for NR28.
- Key lessons from NR23 are addressed and reflected in future regulatory planning.
- Explore enhanced safeguards, such as vendor liability provisions, enhanced fail-safe protocols, and more effective incentive mechanisms to manage operational risks.

If overlap between the NR28 and H8 price control reviews cannot be avoided, we advocate a pragmatic alternative. Specifically, we invite the CAA to consider a one-year extension of the current charges, followed by a five-year period of new price controls. This approach is intended to deliver:

- A clearer separation between the HAL and NERL regulatory processes, consistent with the objectives of the six-year framework;
- Additional time during 2026 and 2027 to address investment priorities, system vulnerabilities, and key licence reforms, including incentives, RAB rules, and TRS arrangements;
- Adequate opportunity to avoid rushed or incomplete business plan development, enabling building blocks to be discussed during customer engagement rounds later in 2027.

easyJet remains fully committed to engaging constructively with both the CAA and NERL to help shape a more robust and future-proof framework, one that aligns with the long-term interests of all stakeholders. We would welcome the opportunity to meet in person to share our analysis and proposals, and to work collaboratively on shaping the most effective way forward.

Yours sincerely,



Francesco Rado

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easyJet Airline Company Ltd.

**Enclosures:** Position on CAA's NR28 Timeline and Customer Engagement Proposals