



Airlines for America®

We Connect the World

January 14, 2026

UK Civil Aviation Authority
Aviation House
Beehive Ring Road
Crawley
West Sussex
RH6 0YR

Re: Economic Regulation of NERL: Final proposals for modifying the License to support the implementation of a UK Airspace Design Service – CAP 3164

Dear CAA Economic Regulation Team,

Airlines for America (A4A)¹, on behalf of its members, welcomes the opportunity to respond to the UK Civil Aviation Authority's (CAA) consultation on the proposed regulatory arrangements requiring NATS (En Route) Plc (NERL) to establish a UK Airspace Design Service and a UK Airspace Coordination Service, as well as to administer an Airspace Design Support Fund. In particular, A4A appreciates the opportunity to provide views on the proposed introduction of an Airspace Design Charge to recover the costs associated with these activities.

A4A is the principal trade organization representing leading U.S. passenger and cargo airlines. Our members operate extensively in UK airspace on a daily basis. As such, changes to UK airspace, including the introduction of new levies on airspace users, are of direct relevance to our members and the customers they serve.

A4A recognizes the important goal of modernizing UK airspace and supports efforts to improve airspace design and coordination in a manner that enhances safety and efficiency for all passengers. However, it is essential that the regulatory framework supporting these objectives is proportionate, transparent and delivers clear value for money to airspace users. A4A urges the CAA to ensure that the Airspace Design Charge is limited to the incremental costs of providing the new Airspace Design Service and administering the Airspace Design Support Fund during the remainder of NR23, particularly given the significant and growing cost pressures already faced by airlines operating in the UK. UK airspace users are currently subject to one of the highest Air Passenger Duties in the world, in addition to a range of existing CAA and NERL charges associated with air traffic services and regulatory oversight. The proposed Airspace Design Charge must therefore be assessed within this broader charging environment and its cumulative impact on airlines and passengers. Any new levy should be clearly justified, fairly distributed and deliver tangible benefits to airspace users.

With respect to the proposed cost pass-through approach for the remainder of NR23, A4A encourages the CAA to ensure that appropriate transparency and reporting requirements are in

¹ Members of the association are Alaska Airlines Group, Inc.; American Airlines Group, Inc.; Atlas Air, Inc.; Delta Air Lines, Inc.; Federal Express Corporation; JetBlue Airways Corp.; Southwest Airlines Co.; United Continental Holdings, Inc.; and United Parcel Service Co. Air Canada is an associate member.

place, and that the correction mechanism proposed for NR28 is designed to address any inefficiencies or cost overruns identified during the initial period.

A4A supports the CAA's objectives of improving airspace design and coordination in the UK. At the same time, the introduction of a new Airspace Design Charge and any efforts to recover costs must be carefully calibrated to ensure efficiency, transparency and value for money for airspace users.

A4A looks forward to continued engagement with the CAA as these proposals are refined and implemented.

Sincerely,

A handwritten signature in black ink, appearing to read "Keith Glatz". The signature is fluid and cursive, with the first name "Keith" written in a larger, more prominent script than the last name "Glatz".

Keith Glatz
Senior Vice President, International Affairs