



Airlines for America®

We Connect the World

August 12, 2026

Economic Regulation Team
Civil Aviation Authority
Aviation House
Beehive Ring Road
Crawley
RH6 0YR

[By email: economicregulation@caa.co.uk]

Dear Economic Regulation Team,

Airlines for America (A4A), on behalf of its members¹, appreciates the opportunity to respond to the Civil Aviation Authority's (CAA) consultation on Heathrow capacity expansion and the approach to the regulatory framework set out in CAP3286. A4A is the industry trade organization for the leading U.S. passenger and cargo airlines. Our members operate extensive services between the U.S. and UK and have a direct interest in ensuring that Heathrow remains efficient, competitive and affordable for airlines and passengers.

A4A supports the position set out by the International Air Transport Association (IATA) in its response to CAP3286 and welcomes the CAA's continued work to strengthen Heathrow's regulatory framework. We agree that affordability must remain a central objective as the framework develops. We believe the regulatory framework should ultimately ensure that passengers and airlines receive the infrastructure and services they require at the lowest efficient cost, with affordability considered across capital governance, risk allocation, financing and project delivery.

This is especially important given the existing cost environment at Heathrow. Heathrow's airport charges are already among the highest of any major international hub, while airlines and passengers operating in the UK also face a significant aviation tax burden. Heathrow's price increases mean that passengers and airlines have paid £1.1 billion more than they would have if the airport's charges were aligned with other major European airports, according to data from the Jacobs Airport Charges Index.² Expansion must not compound those pressures through unnecessary cost escalation or the transfer of inappropriate development and delivery risks to current airport users. A4A therefore agrees that strong cost discipline, effective governance, competitive procurement and the appropriate allocation of risk are essential to ensuring that investment delivers genuine value for consumers.

A4A would also like to highlight the importance of early and meaningful consultation with the airline community. Airlines should have the opportunity to influence decisions before key strategic choices regarding the need, scope, design and cost of infrastructure have effectively been made. Engagement that occurs only after those decisions have been taken limits users' ability to challenge whether projects are necessary, appropriately scoped or represent the most efficient solution. Early engagement, greater

¹ Members of the association are Alaska Air 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.

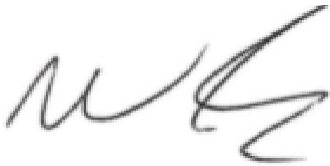
² Heathrow Reimagined, [Heathrow Facts and Figures](#).

transparency, independent scrutiny and clear accountability should therefore be embedded throughout the development and implementation of the future framework.

For A4A members, these issues have implications beyond Heathrow itself. Transatlantic aviation is a critical economic bridge between the U.S. and UK, with Heathrow in particular serving as the top foreign scheduled passenger gateway to the U.S., according to the U.S. Department for Transportation.³ Maintaining an affordable and competitive operating environment is therefore important not only for airport users but also for the UK's wider connectivity and competitiveness.

A4A welcomes the direction of travel reflected in CAP3286 and encourages the CAA to continue engaging closely with industry stakeholders as the detailed framework is developed.

Sincerely,

A handwritten signature in dark ink, appearing to read 'MS', is positioned above the printed name and title.

Marco Sylvester
Senior Vice President, International Affairs

³ U.S. Department for Transportation, [U.S. International Air Passenger and Freight Statistics](#) (September 2025).