



Judith Ross
NATS/CAA regulatory appeal
Competition and Markets Authority
The Cabot
25 Cabot Square
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United Kingdom

Brussels, 18 December 2019

Per e-mail: nats.caa@cma.gov.uk

Subject: NATS En-route Limited (NERL) Price Determination

Dear Sir/Madam

CANSO wishes to submit this supporting statement with respect to the NATS En Route CMA case. CANSO is association of Air Navigation Service Providers (ANSPs) and represents almost 90% of world air traffic.

Whatever the outcome of the CMA process, we would not wish to see a reduction in NATS' international engagement and contributions as we believe this would be detrimental to the UK's standing in the aviation industry and presents a risk to efficient operations.

NATS is an exemplary Air Navigation Service Provider and a global leader in the ATM industry. Its advice and support is regularly sought out by other ANSPs and organisations seeking to implement ATM policy and regulations.

Over the years, NATS has also developed a safety and human factors capability that is top calibre. Today, NATS involvement in global cross-industry task forces on critical issues such as safety helps elevate the capability of other ANSPs, which in turn serves to protect U.K. citizens travelling abroad. In the future, the advent of new technologies, new entrants to airspace such as drones and spacecraft and increased automation of the air traffic controller task, mean that this knowledge and expertise will become more and more critical.

NATS also plays a vital role in Europe by helping to drive efficiency in the European Network through participation in formal network management and planning processes and by exercising leadership in the network governance arrangements to meet customer needs and requirements.

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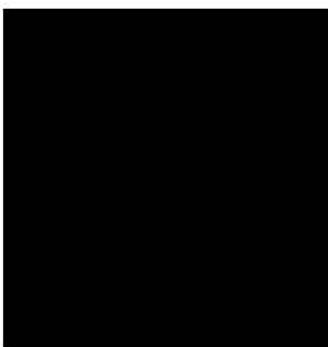
In addition, NATS manages vital flows of traffic over the North Atlantic as they enter and leave the European network. It is constantly seeking ways to improve the efficiency of this service. Recently, NATS was part of a consortium which launched spaced-based Automatic Dependent Surveillance – Broadcast (ADS-B) over the ocean which is already delivering significant safety and efficiency benefits critical to the effective and efficient integration of North Atlantic traffic with the European network. Innovations and improvements such as these may be significantly more difficult to introduce within the context of the Reference Period 3 (RP3) regime currently proposed.

A final point to make is that there is currently a shortage of air traffic controllers across the globe. If the CAA's RP3 proposals go ahead as planned, this will result in a reduction in the number of controllers in the UK. At a time when air traffic is predicted to grow year on year, this will likely result in reduced capacity and delays for the travelling public, which could in turn impact the UK's reputation.

In summary, the capability and expertise within NATS is industry leading. We genuinely believe that RP3 proposals as they currently stand could seriously curtail the extraordinarily valuable role NATS plays within Europe and globally, and more importantly could have a detrimental effect on operations within the UK.

I am happy to have a conversation, should you wish to discuss any points in more detail.

Yours Sincerely,



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Director Europe Affairs

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