

Dear Sir/Madam

Many thanks for the opportunity to provide feedback regarding the uncertainty of the full effects of COVID-19.

In response to the specific consultation questions, while we appreciate there is little certainty about the precise details of the impact from the pandemic, the one aspect that is very clear is that revenue streams associated with air travel will be extremely challenged for at least the next 12-18 months (and potentially much longer). As such, there definitely needs to be a review of the pricing model to ensure all spend/recovery is appropriate in the new context.

The other aspect this pandemic has demonstrated is the absolute reliance that every stakeholder has on the ability for the airlines to operate and with a reasonable commercial payload. While we are not calling for this to result in any specific favouritism, the future charging model much be constructed to support the recovery and not create additional burdens to the airline community. Any extraneous cost or investment could potentially impact such recovery and the result negatively affects all stakeholders. Ultimately we believe that all spend/investment during RP3 should be reviewed to validate the absolute necessity to continue and justify the benefit for the airspace users.

For the second question we concur that the price control should be three years but with the ability to extend if need be.

Regardless of the decision at this time, it is imperative that a mechanism is in place to constantly review the effects and developments and react accordingly. While obviously the current focus is on near term cost, we also need to ensure that as an industry, we can react quickly and correctly should developments require a change of model.

We see this not so much as the effects on an airline only but on the entire air transport industry and the ability for the population to continue to be able to travel the globe, safely, quickly and at a cost that is affordable to the majority. Should pricing models be set with the belief that certain bodies can "recoup" lost revenue due to this pandemic, those very bodies may well also go out of business if the result of their pricing results in insignificant numbers of aircraft flying.

This must also be our driving force. Not to allow an entity to claw back perceived lost revenue at the expense of another entity that it relies on.

We are happy to provide further details if required.

Regards

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