

Dear Marie,

Here are some preliminary comments on the report itself.

It is in line with the views Avinor has put forward earlier:

- not much to gain from structural changes e.g. difference in lower and upper airspace charges
- focus more on the level of charges
- level out the effects of sudden, radical and sometimes temporarily changes in traffic levels
- predictable charges for customers
- prevent underfunding of infrastructure
- a weight element (MTOW) should be contained in the formula in order to create an overall optimum charging policy and also to prevent smaller customers with less ability to pay from leaving the marketplace (these are also profitable to us)
- the "passenger" element has a tendency to be included in the "tax-box" of the ticket, and as such drives the price of the ticket, of which the burden is carried by the end-user, the passengers

In short, Avinor is focused on the following considerations:

1. A simple and transparent charging mechanism (formula and rules) that prevents bureaucratic administration and unpredictable side-effects
2. The charging mechanism must take into considerations "the ability to pay" element
3. Avoid introduction of changes that has a negative effect on the prevailing traffic pattern in Europe and in each state (read: the main customers)

We have noticed that CANSO and Avinor in earlier discussions have shared different views on certain elements (e.g. the weight element). The pattern of traffic and the main considerations may vary from country to country and even from continent to continent. CANSO should appreciate this and be careful in supporting certain views that may be beneficial for some members, but may work in the opposite direction of others.

We underline again that these are our preliminary views. We intend to attend the tentative workshop with competent people, and we are at your disposal for further enquiries regarding this and any other matter.

Best regards

Knut Skaar
Director ATM
Avinor