

Service central  
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Date: **17 SEP 2003**  
Ref.: CRCO/ERA  
Subject: RPI draft final report on economic regulation.  
Objet:  
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Mr Denis HUET  
EC focal point on economic regulation study  
DG TREN  
European Commission  
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Dear Mr Huet,

By e-mail of 1 August 2003 you invited stakeholders to comment on the RPI consultants draft final report on the implementing rules of economic regulation within the framework of the Single European Sky.

Consequently, I wish to offer you some "high-level" comments; further comments addressing the technical aspects of the consultants' findings, and in particular the proposed charging structure, will be put forward by the EUROCONTROL Agency's representatives during the planned workshop in October.

First of all, I would like to commend the RPI consultants for their authoritative piece of work showing an excellent understanding of the key issues in ATM economics and covering a wide range of policy options.

Concerning the policy options put forward by the consultants for the ATM co-ordination and infrastructure management (Section 5 of the report), I would encourage the European Commission to take in due account the proposal to establish a **European Network Manager** (System Operator) with "a less passive European-level role which would be more appropriate in ATFM". In my view, if such a proposed "less passive" role is accepted and if the responsibility is assigned to the EUROCONTROL CFMU through appropriate implementing rules, their development should be included in the EC's SES work programme and be finalised by the end of 2004.

Similarly, a thorough reflection should be given to the proposed establishment of a **European Infrastructure Manager** "with responsibilities for identifying, developing, and facilitating the management, and possibly also the financing of (such) project". This is an interesting concept and EUROCONTROL would be happy to make proposals for rapid implementation.

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Finally, and more specifically in the economic domain, the recommended creation of a **Revenue Recovery Imbalance Account** intended to be used "to adjust future allowable revenues according to specified profiling rules" (e.g. smoothing the unit rates over time) is a feature which is worth pursuing and which could actually be operated by the EUROCONTROL Agency/CRCO.

I wish you a successful workshop meeting and look forward to address the appropriate implementing rules of the European Commission on the basis of the consultants' study and stakeholders' reactions.

Yours sincerely,

A handwritten signature in dark ink, consisting of a series of loops and a long horizontal stroke at the end.

E. SÖHNLE  
EUROCONTROL Focal Point on  
Economic Regulation Study