

We refer to your mail of 17 October asking for comments on the final RPI consulting report and the discussion held on 15 October in Brussels. Still valid are our comments made to the final draft put forward in a mail dated 01 September.

- Avinor is satisfied with the broad job that has been done in the RPI report on 'Economic regulation within the European Single Sky'. The report underlines the complexity in the ATM network and that changes made to the existing regime not always will be beneficial for the total performance. Changes can easily be both discriminating, disturb competition and make the revenues more complex to administrate as described regarding differentiation between upper and lower airspace. Side effects can be found in different part of the network and it's important that this is analyzed truly before any changes are made. It's much better to start with one change and analyze the effect instead of a complete new model.
- Avinor could support the introduction of a 'gate to gate' charge. We can see positive side effects of one 'charge' financing the different European 'national' ANSP. But we are not in favor of splitting the costs between relevant operational drivers instead of services, if this means that the origin and destination part shall not have an element of 'ability to pay' (as the weight elements of today's route charge take into account). If an introduction of a 'gate to gate' charge bring the enroute part value relatively lower, as suggested (80km instead of 20km and introduction of max. levels for the enroute part), the effect would be relatively lower total charge for non European carriers and European airlines with a large portion of long distance flights. Furthermore if, at the same time, 'ability to pay' are not include in the end parts the result could even be more negatively with a reduction of total ANSP revenues in Europe collected from charge with an 'ability to pay' element. The effect will be hard on regional carriers and medium range on low profitable routes and be both discriminatory and distort competition.
- In Norway we do not have a separate approach charge. This part of the ANS costs is financed through the landing fee (an airport charge). This charge is weight related. If 'gate to gate' are introduced we strongly prefer this to be done in a way which allow us to charge the same proportion on the enroute element as today, and the origin/destination part based on weight, as today, with a portion similar to the one today finance through the landing fee. Further more is it important to have the possibility to charge origin/ destination elements related to our system costs (all terminal costs together divided on numbers of terminals) and not based on separate costbases for each terminal. This will allow us to analyze if the implementation can have negative side effects (if regional airports loose traffic the hubs feed by them will loose too, negative spin-off effects should be avoided).
- We can support the introduction of the new activities executed by the introduction of a Network Manager or Infrastructure Manager, but they should be planned done by existing bodies and existing resources in Eurocontrol. New budget elements influencing the Eurocontrol membership costs can not be accepted. From 98 to 04 the membership cost has increased for Norway by almost 67%.

- In the presentation of the final report meeting 15 October it was also mentioned the necessity of an independent forum where providers and customers could meet to set and discuss KPI goals, charge level, capacities and services. In our opinion the exits forums already today which can undertake this job. PRU is a forum where providers make visible and discuss their performance. The data provided to this benchmarking work and KPI calculated will be of much more value at once 'enroute' and 'terminal' costs and the allocation between them are provided. This could be the reality if a 'gate to gate' charge is introduced with transparency related to the costbases 'beneath' it. In addition we have the existence of the Enlarge Committee where the enroute charges are set each year. Based on the work of the two mentioned forums, information and data can be used on national level where each ANSP invites their airspace users for a more narrow discussion. Today Avinor complete several meetings like this each year.
- Avinor is against reduced charges for planes with new systems as data link. If this is introduced in congested areas carriers here will have a much shorter payback period for their investment than carries with home base in non congested areas because they will more sporadic benefit form the reduced charge to finance their new investment. If they do not invest they will have to pay a higher charge. If a reduced charge are introduced in the whole network the investment must also be done by low ability to pay carriers, not necessarily flying in congested areas (25 000 EUR can be a large amount for a small air-taxi operator), to benefit from a lower charge. Our proposal is to let the market solve the problem. If an ACC has to make this investment they will gain a higher capacity in their area of responsibility and if the system allows an airline with the system to fly a more direct route or have other advantages both parties will benefit without introducing a lower charge. In addition introduction of different charges will entail increased administration costs.
- If the 'gate to gate', enroute and terminal, are made mandatory for the whole ATM network in Europe, you must also take independent providers in terminal areas into account. In Norway we have some airports providing flight information service in their own terminal area and in the future with a new charging model they will be needed to be handled otherwise and their accounts revised.
- Funds should be collected on national level and be kept to finance investments in that area. Carriers operating domestic in Norway should not be charged extra for congested areas in other parts of Europe. The charges should reflect the costs of the area you fly into/ through and not be 'paid' by passengers in other countries.

We find it difficult to comment on a more detailed level since the presentation on the last meeting was kept on a superficial level. We missed examples on different kind of a 'gate to gate' charge models including what the different elements (origin and destination) should consist off.

Since this report was referred to as the beginning of a process we anticipate a narrower introduction to different kinds of subjects later before any conclusions are drawn by the EU Commission.

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