



European Commission
Directorate General for Transport
24, Rue de Mot, DM 24 5/25
B-1049 Bruxelles
Belgium

Swords, 1 December 2004

Dear Sir/Madam,

Consultation on Commercial Slot Allocation Mechanisms

The Airport Regions Conference is an association of European local and regional authorities hosting an international airport. As a representative body of 27 European airport regions with over 100 million citizens, we would like to take the opportunity to submit our view on the introduction of commercial mechanisms in slot allocation via the current consultation for the revision of Regulation (EEC) 95/93.

A recent discussion amongst our membership reveals that there are several opinions on the issue of commercial mechanisms in slot allocation. The effects of slots differ with the characteristics of the region. Slot allocation mechanisms affect peripheral regions, major hubs and regional airports in a different way. Therefore, the ARC members have decided¹ not to take a certain position at this point but instead raise the issues and concerns that exist amongst the members.

ARC believes the slot issue should not only be regarded as an open market issue. It should also be enlightened by the need of bringing Europe closer together, bringing peripheral regions and new member regions in connection with the major regions in Europe to enhance the cohesion of the Union as well as enhancing the economic development. In airport regions where noise and emissions are major topics, slots may also serve as an instrument to enhance sustainability. The examples below address issues that have the concern of our members in relation to the introduction of commercial mechanisms in slot allocation.

- The idea of having a slot allocation model with criteria that reflect the principles of the Lisbon and Gothenburg strategies and the Cohesion policy should be explored;
- As with all policies, ARC strives to balance environmental and economic effects. It was mentioned that commercial mechanisms in slot allocation could be used as a lever for environmental issues;
- Typical tourist airports, for example on the Canary Islands, often have different flight patterns with very different peak times from other airports; this fact should be considered in the categorisation of airports where the mechanisms will apply;
- There are concerns that slots for flights from regional airports are not guaranteed at hub airports;
- Peripheral regions need to have access to slots that enable business people to travel into major airports at times of the day suitable for business;

¹ Annual General Meeting, Brussels 24 November 2004.

- How should the changed business model (low cost airlines) be taken into account?
- As mentioned before revision of slot allocation rules should be seen in the light of the Lisbon and Gothenburg strategies and the Cohesion policy. For the latter, a link between slot allocation rules and Trans European Network policies could be made;
- There is the question of who can buy and/or trade slots. Can a regional authority buy slots? Could it act as a 'slot broker'?

At the ARC Annual General Meeting in Brussels last week, the ARC member regions requested the possibility to further address this issue. In consultation with our members we will deepen certain issues from the list above and we will keep you informed. As representative of the elected bodies in airport regions around Europe, we believe it is important that we share our views with you and bring you our opinions on an issue that also has to be considered from a regional development perspective rather than as a commercial relation between airports and airlines only. We are open to participate in further discussion on slot allocation and we are happy to offer the expertise of our members on specific issues.

Yours Sincerely,

A handwritten signature in black ink that reads "Anne Devitt". The signature is written in a cursive, flowing style.

Cllr Anne Devitt
ARC President