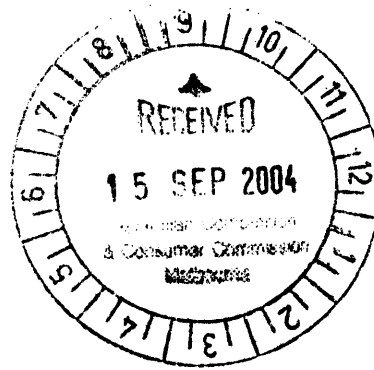




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14 September 2004
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Ms Margaret Arblaster,
 General Manager,
 Transport and Prices Oversight Branch,
 Australian Competition and Consumer Commission,
 GPO Box 520J,
 Melbourne, VIC 3001,
 Australia

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Dear Ms Arblaster,

Submission to the ACCC on the Draft Pricing Notification of Airservices Australia

Emirates would like to use this opportunity to support and endorse the submissions made by IATA to the ACCC as part of its review of Airservices Australia's (AsA) draft pricing proposal. Furthermore, we would like to express our appreciation for the exemplary effort and the professional approach taken by AsA during the detailed consultation process undertaken with the industry to develop a long term pricing path proposal.

However, there is still one significant area in which we consider that a further, more detailed review is required: AsA's current weight and distance-based charging structure. In line with some of our industry colleagues, we suggest the review criteria should include:

1. identification of the main cost drivers associated with different services; and
2. consideration of different potential charging structures against a specified set of criteria, possibly including:
 - alignment with cost drivers and beneficiaries,
 - practicality of implementation,
 - incentive effects for investment by both AsA and users, and
 - changes in the level of payments made by different sectors of the aviation community.

We acknowledge that there was not sufficient time available to explore this important issue in appropriate depth in developing the current pricing agreement. However, Emirates considers that this issue should be addressed by industry with a proposal put to the Commission in due course.

Yours sincerely,

Robin Padgett
 Regional Manager Procurement Operations WAPR

cc Richard Vaughan Emirates, Senior Vice President - Co East Asia & Australasia
 Bob Everest Emirates, Vice President - Flight Operations Support

The International Airline of the United Arab Emirates