Our Ref: 0877/04

15th September 2004

MACKAY PORT AUTHORITY

Ms Margaret Arblaster
General Manager Transport and Prices Oversight
Australian Competition and Consumer Commission
Box 520J
MELBOURNE VIC 3001

Dear Margaret,

Re- Issues Paper Draft Price Notification – Airservices Charges – August 2004

Firstly, thank you for the opportunity to make comment on the proposed price increases by Airservices Australia, which will have a very large impact on our business and the economic development of our regional community with inequitable prices in comparison to larger airports. In 2007/08 the charges in Mackay for Airservices Tower and ARFFS services will be $29.76 a tonne of MTOW compared with Sydney $6.61. This equates to a landing charge of $2,053 or $19.01 per passenger compared to Sydney landing charge of $456 or $4.26 a passenger on a Boeing 737-700 aircraft with 108 passengers. The low everyday airfare Sydney to Mackay is $99 so a price differential of $14.75 represents 15% of the fare.

Whilst we accept that the present Subsidy for Regional Tower services is not a long term solution and have always encouraged a network approach for domestic services, we feel a network charge or a reasonable capped charge, CPI adjusted on Tower and ARFFS services would be acceptable and not severely disadvantage growth of airline services to regional Australia, and therefore encourage tourism to these destinations.

For background we also enclose a copy of our submission to Paul Logan, Price Review, Airservices Australia in order to provide more background on this issue.

We will answer each issue outlined in your paper:-

The ACCC seeks comment on the effectiveness of Airservices' consultation processes in its development of the draft price notification and the extent to which the proposal is supported by you or your organization.

At Mackay airport just prior to the consultative meeting we were advised that the meeting was open to all stakeholders. Unfortunately not many GA charter operators were contacted by Airservices or able, at late notice to attend and express their views.

The application of location specific pricing to domestic ARFFS and Tower services will always create a detrimental competitive effect on regional airports with low volume such as Mackay compared to capital city airports. In particular the nearby airport of Proserpine with anticipated passenger throughput of over 200,000 has no Tower or ARFFS service and no charges and therefore saves an airline the charge that applies at Mackay of $2,053 in operating costs of a Boeing 737. The charge for the same service at Sydney will be $456.

When airlines are considering where to operate additional capacity the costs of operating a particular route plays a big part in their decision making.
For these reasons Mackay airport cannot support the proposed charging system as it discriminates against communities that have these services and are doubly impacted by having to pay a premium due to lower volumes.

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The recommendations of the House of Representatives Standing Committee on Regional Air Services in November 2003 proposed a network universal per passenger charge for ARFFS services to overcome this inequity. Such a standard "fee for service" approach is strongly encouraged as a more equitable model for domestic services.

The ACCC seeks comment on the appropriateness of the risk sharing arrangements embodied in the proposal, in particular relating to the activity trigger mechanism, the approach taken to changes in Airservices' capital expenditure program and changes in regulation.

Firstly let us say that once again Airservices have underestimated MTOW volume at Mackay airport by using old throughput data and have extrapolated that erroneous data to arrive at an unfair estimate. They have taken a very conservative view to hedge their pricing very effectively, and so have very minimal risk at Mackay airport of a loss due to fluctuations in tonnage, whilst benefiting from the gain in volume to which they have made no contribution in achieving.

Last year during the pricing review Airservices estimated a MTOW throughput of around 130,000 tonnes for ARFFS as against our estimate of 160,000 to 166,000. The final figure for 2003/04 was 161,000.

The tonnage estimate used in this proposal is 167,000 for ARFFS and our estimate based on present throughput by extrapolating June figures and allowing for additional services that began in July, (and are proving to be sustainable) is 206,000. This is 23% higher than Airservices estimates and would mean a charge of $9.45 in 2004/05 rather than the $11.66 proposed. Using the present new base of 206,000 and using Airservices projected increases will mean 222,000 tonnes in 2008/09 as against the Airservices estimate of 180,000. So the proposed charge of $17.07 in 2008/09 should in fact be $13.84, quite a difference.

So with those experiences we are concerned that the starting point and the model projections are going to be incorrect and therefore Mackay airport is effectively penalised threefold.

The network allocation of Capital Expenditure costs also requires further explanation as to the benefits that will be provided to Mackay airport.

The fact that Nav Aid costs for VOR / DME / NDB at Mackay airport are split between Enroute and Tower services whilst at non tower airports these costs are solely allocated to Enroute charges is not consistent, nor is it fair and equitable.

The ACCC seeks comment on the efficiency with which Airservices provides its services, including:
- The level of estimated operating costs reflected in Airservices' proposal
- Airservices' incentives to, and effectiveness in, containing and reducing costs

Whilst Airservices advise they have reduced costs over recent years, the costs of providing ARFFS and Tower services have continually increased. It is a proven fact that Government owned entities operate a higher cost level than private enterprise.

I have not seen first hand any cost reduction measures implemented at Mackay airport for ARFFS and Tower services. The only way to really test the cost structure is to invite tenders for contracting out of these services on the open market.

The ACCC seeks comment on the efficiency of Airservices' proposed capital expenditure program, including:
- The appropriateness of the capital projects included within the proposal
- The level of the estimated costs of the capital expenditure proposed
- The approach taken to determining the capital expenditure program over the period covered by the pricing proposal

With regards to Mackay airport it is not apparent what the capital expenditure for the ARFFS services is over the five year period as this was not included in the location specific summary. The Tower provided a split up of the estimated $1.05m spend, but not ARFFS whose Asset Write Down Value increased from $1.32m to $3.08m without any supporting details.

The ACCC seeks comment on:
- The efficiency of Airservices' asset base
- The appropriateness of Airservices' new values for its asset base
- The appropriateness of revaluing assets which previously had a zero written down book value

We do not have enough information to make a determination on the validity or appropriateness of the revaluation model, however revaluing previously written down assets further exacerbates the large increases in charges at regional airports.

The ACCC seeks comment on:
- The appropriateness of Airservices' proposed rate of return on capital
- The proposal to apply a transition to a higher WACC by different rates of return in each year
- The extent to which the proposal will act as an incentive on Airservices to achieve increases in productivity

As long as cost savings through efficiency gains or sub contracting of services takes place then we accept that an industry comparable rate of return should be realised on capital.

The ACCC seeks comment on whether the proposed method of cost allocation is appropriate.

Without knowing precisely what is allocated from what divisions it is not possible to ascertain appropriateness.

The comment I would make is that if the regional towers and ARFFS facilities did not exist then the overheads would probably be not much less than at present and therefore it could be argued that it may not be appropriate to just pro rata the costs on a revenue or expenses basis, especially if little or no capex is expended at the regional facilities which appears to be the case compared with capex spent at the larger airports which have more technology such as approach radar, ILS etc.

The ACCC seeks comment on the appropriateness and efficiency of the application of a capital city 'basin' approach to charging for terminal navigation services

Why limit the "network approach" to the capital city basins? RPT operators at regional airports suffer similar delays when a Jet aircraft has to hold and wait for a light aircraft approaching for a touch and go as landing aircraft have precedence over departing aircraft. Why not have the basin extended to cover all domestic services to each airport with these services in every state. The Internationals would complain of a reversion to network pricing if applied universally so why not have a two tier charge Domestic Basin and International.

The ACCC seeks comment on the appropriateness of the phasing in of proposed price increases stemming from both changes in the structure of charging and from projected cost (operating and capital) increases.

The phasing in of the increases is a realistic approach and softens the big hit on the regional airports to some extent. However at the end of the day the attractiveness of airlines increasing their capacity to regional airports is diminished due to the much higher charges than capital city pairs or capital city to non Tower and ARFFS airports.

The ACCC seeks comment on the appropriate method of achieving Airservices' stated aim of avoiding cross-subsidies and on the appropriateness of the levels of cross-subsidies between services and between user groups contained in the pricing proposal.

A two-tier International and Domestic charging system would be more appropriate with a cap remaining on Tower and ARFFS services. This would result in an effective reversion to a domestic network system on a fair and consistent "fee for service' basis.

In order to encourage more airline services to regional airports and thereby increase tourism and economic development in those regions the Government needs to find an equitable balance to ensure affordable airfares to regional Australia.

More generally, the ACCC seeks comment on:

- Whether the proposed prices provide appropriate incentives for Airservices to provide services at particular locations
- Whether the proposed prices provide appropriate incentives for users of Airservices services to provide services at particular locations

I see no incentive from the proposed pricing as it merely extends current "cost plus" pricing and defers the increases by stealth to minimize the initial impact.

The ACCC seeks comments on the likely impact of the proposed prices on the users of airports and air traffic control services. In particular, the ACCC seeks comment on the likely impact on:

- Demand for air travel
- Airline scheduling decisions
- Providers of other aviations services
- Airfares

The new pricing model still does not address the gross inequity between high volume capital city airports and low volume regional airports that are required to provide Tower and ARFFS services. The price will exacerbate over time the already unfair cost differential in landing at these types of airports. Mackay would be impeded in year five with a cost of $2,053 of landing a Boeing 737 aircraft as against Sydney $456. **A difference of $1,597.** When airlines decide where to place additional fleet capacity they take into account the fare yield they will get on a route as well as the operating cost to a destination. So why would they fly extra daily services to Mackay airport when it is going to cost them $582,905 more a year than operating a comparable Brisbane or Melbourne to Sydney service.

If they decide to do it and add the extra price to the airfare they will suffer buyer resistance due to price elasticity. Mackay price elasticity is probably around 2 given the mix of business and leisure travel. This means if the price differential between a Sydney and Mackay service is $1,597 a landing or $14.75 a passenger on an airfare of $79 then an increase of 15% in airfare will result in a decrease in demand of 30%. Jetstar have already advised us that instead of increasing our four times weekly direct Sydney service to daily they will place the extra three services into Proserpine airport, 120km away as they don't have to pay Tower or ARFFS charges at that airport as the services are not established here. They will be $20 a passenger better off.

Once again thank you for the opportunity to make comment and we trust the ACCC will take into account the effect of these disproportional charges at regional airports into account to ensure growth of Tourism and Regional Economic Development.

Yours faithfully

JOHN TAYLOR
Chairman

Our Ref: **0636/04**

29th June 2004

MACKAY PORT AUTHORITY

Mr Paul Logan
Price Review
GPO Box 367
CANBERRA ACT 2601

Dear Paul

Re: Airservices Australia – New Price Consultation

I refer to your letter of 31st May 2004 outlining this process and inviting the Mackay Port Authority (MPA) to respond. You have requested that our response address specified headings as follows:

- **The efficiency of our *{Ed - AsA's}* operation**
    - **The efficiency with which we provide our services**
    - **The level of facilities and resources supporting our services**
    - **The level of operating costs for our services**

It was very disappointing that there was poor communication to airport owners as to who was invited to attend the consultation briefing in Mackay by Airservices Australia on Wednesday 16th June 2004. Many GA and charter operators as well as stakeholders like Mackay City Council, Mackay Chamber of Commerce and Mackay Tourism Ltd representatives were not advised nor had short notice of the meeting. I don't know whose job it was to coordinate this meeting but the result was not good and as such the consultation process was not as effective as it should have been with many stakeholders not given the opportunity to comment.

It is difficult to answer your questions with authority without having worked on the job inside your organisation at all levels, and it depends on which business unit we are discussing. I must say my confidence in Airservices has been severely tested with incorrect forecasting figures proposed once again together with a constantly changing (but consistently upward) advice on operating costs for ARFFS at Mackay Airport. Last year the figure was $1.8m, then $2.6m earlier this year and now $2.9m - cost control does not seem to be a focus or driving force.

If you consider ATC then my observation is that the persons employed in the Mackay tower on roster are fully productive. The same cannot be said for the ARFFS service with twenty employees waiting for something to happen and little opportunity to utilise the surplus staff during the extensive periods when level 6 only is required.

It has been demonstrated time and time again in this industry and others, that government operated entities have a far greater cost base than leaner private enterprise or fully corporatised organisations with flat management structures and lower corporate service overheads.

For example, the Authority's Airport General Manager Trevor Heard requested a price per hour to utilise the ARFFS mechanic, whilst our mechanic was on leave for three months, for at least eight hours per week. The original price quoted to the Fire Station Manager was around $70 an hour; we can source local contractors with their own equipment at $50 an hour or a mechanic through Ready Workforce for $35 an hour using the MPA workshop and equipment.

Mackay Airport has aeronautical revenue of $3.8m for 2002/03 on assets with a WDV of $53m for a rate of return of 2.45%. The airport charges relate to around $10 per passenger for the provision of operation and maintenance of runways, taxiways, aprons, terminal facilities, car parking, security and safety of passengers and aircraft.

Airservices proposes an income of $5.2m for assets of $2.2m, generating a 9.75% rate of return and equating to a charge of $14 a passenger.

In terms of value for money in services provided, the comparison does not seem fair, equitable or reasonable in the current economic environment.

- **The level of future investment**

With ARFFS I note written down asset values increased by $420k in year 2, $490k in year 4 and $920k in year 5. These seem to indicate rather large increases in assets, especially when taking into account those figures are net after depreciation.

Tower capital expenditure is more transparent, whilst still not detailing what the National Tower upgrade will mean in terms of additional assets at Mackay tower.

These forecasts do not drill down to the detail of what is going to be delivered on the ground at Mackay. Can this be provided for the sake of transparency?

- **The activity volumes forecast for our services**

The forecasts used in both Tower and ARFFS appear to have been arrived at by extending the past trend line to arrive at forecast tonnes. This could explain the discrepancy between our forecast for 2004/05 and AA in both Tower and ARFFS cases. Whilst the Tower captures and charges for all aircraft during duty hours, ARFFS only capture and charge aircraft above 2.5 tonnes.

Our estimations based on the present and advised schedules of our main operators Virgin Blue, Qantas, Jetstar, Sunstate, Singapore Flying School, Macair, freighter operators and smaller commuter feeder airlines are as follows:-

	Airservices	Mackay Port Authority
2003/04		
Tower	169,000	
ARFFS	162,000	160,000 to 166,000 email to Craig Roberts 28/4/2003
2004/05		
Tower	174,000	200,000
ARFFS	167,000	193,000

The accuracy of forecasts on which pricing is based is critical for a smaller airport like Mackay because as you can see incorrect forecasting can mean a 15% variance in pricing. In April 2003 Airservices forecast for 2003/04 ARFFS tonnage was in the low 130,000 tonnes range and we questioned that figure and advised a revised figure of between 160,000 and 166,000. I note the latest estimate for ARFFS for 2003/04 is 162,000 which falls within the range we forecast in April 2003.

- **The structure of prices, including recovery alternatives**

There are a number of users of these services:

- RPT passenger airlines – International and Domestic
- Freighter aircraft operators
- General Aviation

For ARFFS recovery the main recovery should be based on the driver for providing the service - passengers. To overcome the argument that international passenger airlines should not be subsidising domestic operations, a two tiered approach is proposed as suggested by Virgin Blue in its submission to the ACCC. A charge based on a universal per passenger per sector charge should be used for airports that provide those services (Tower and ARFFS). See attached for recent changes in airline and airport charges methodology.

ARFFS charges for larger freighter aircraft could be based on the existing MTOW charge, with a lower charge for all aircraft below 5,700kg including GA, similar to the existing charges with yearly CPI adjustments.

A similar approach should be used for recovery of Tower costs; a universal per passenger per sector charge for passengers on RPT airlines and a MTOW charge similar to present, for freighters and GA operators with yearly CPI adjustments.

Part of the above were recommendations from the "House of Representatives Standing Committee on Transport and Regional Services" dated November 2003, where the committee proposed a "Universal Service Charge for aviation and firefighting services at regional airports to reduce the wide disparity in the charges for those services and to reduce the overall impact of the charges on regional aviation costs".

Should this approach not be acceptable then the only fair alternative would be to cap the existing charges for ARFFS and Tower at regional airports and meet the shortfall through a Community Service Obligation expense item in Airservices Australia's group profit and loss accounting.

- **The rate of return to be included in the prices**

The target 9.75% rate of return seems unrealistically high given the current economic environment, particularly when viewed against the current low rates of return for Airlines, Airports and GA operators. I would question the need to obtain a return on locations that are already labouring under a large financial impost, most particularly impacting adversely on regional communities with reduced services due to the much higher charges per passenger than in capital cities.

- **The impact on users if prices were lifted to recover the full cost per unit:**
  - **The demand for services**
  - **Flight schedules**
  - **The prices of aviation services**
  - **The impact on airports and other related services**

It is proven economics of supply and demand and price elasticity that a 1% increase in airfares will produce between 1.5% and 3% reduction in demand. So if an airfare increases from $79 to $89 (12½ %) with higher Airservices charges then that will mean a decrease in passenger numbers of 25% for Mackay with an estimated elasticity factor of 2%. This has been proven again and again as we see reduced airfares producing passenger growth of over 20% year on year as the price of airfares to Brisbane has dropped from $138 one way to $79 in the last three years.

Jetstar has already advised us that it had planned to increase the four times weekly service direct to Sydney to daily in October, however due to the proposed Airservices increases at Mackay, they will now send the extra three services to Proserpine Airport 120 km to the north to save $20 a passenger, as Proserpine does not have Tower or ARFFS services.

This will also no doubt affect Virgin Blue's decision making on expanding services as they already operate nine services a week to Proserpine Airport.

So Mackay Airport will suffer a double hit – reduced passengers due to lower demand at higher fare prices and loss of natural growth due to no charges at a nearby airport without Tower or ARFFS - which makes a mockery of Airservices focus on safety.

Mackay is emerging as a major tourist destination with major developments under construction, approved and planned for the near future; all these developments will rely on affordable airfares to bring visitors to the Mackay region. Obviously demand and therefore development will be stifled with the proposed Airservices charges at Mackay Airport, which will translate to a cost of $22 for each person travelling into and out of Mackay Airport.

This figure is arrived at using the proposed average charges over the five years of $34.65 a tonne on a Boeing 737-700 aircraft of 69 tonnes or $2,390 against the present charge of $1,200. Assuming the standard load factor of 75% on the 144 seat aircraft, this will mean 108 passengers or $11 extra a passenger. The lowest fare available to Mackay at present is $85 and this will increase to $96 or by 13% which at elasticity of 2% will mean a downturn in demand and passengers of 26%.

- **Alternative ways to deliver the services**

As direct competition for the provision of services has been defeated in the Senate is it possible for Airservices to consider the tendering for provision of these services on a subcontract basis to Airservices? This would be a robust check on Airservices pricing and could save the industry costs.

Non-FAC airports do not have the opportunity to provide these services under present regulations.

I am sure co-locating of State and Airport firefighting services would provide cost savings synergies in terms of provision of buildings, distributed and supplier services as well as a smaller pool of staff due to cross training of staff.

- **Other issues**

Allocation of costs
In relation to depreciation, ROI for Navigation Aids such as the VOR/DME and NDB located at Mackay Airport, I am advised that these costs are allocated to Mackay Tower operation. So why is this so when with the same equipment at Proserpine airport, that has no tower, the costs are allocated to enroute charges? There is a lack of consistency.

Pricing reviews
Forecasts can vary considerably from actual outcomes in tonnages, and labor costs vary markedly due to changes in airline schedules and the CASA application of ICAO standards on remission of level of services (17 staff instead of 20 at Mackay).

Will there be a review each year and an adjustment to actual tonnage and actual capital expenditure with a credit for excess profits above required ROI being used against next year's costs, or are we locked into Airservices 5 year forecasts?

If the proposed charges are introduced it will have a severe impact on General Aviation and Regional Airports, that are struggling to make ends meet now and suppress regional development and job opportunities.

I would urge Airservices Australia to look at the big picture, consider their community service obligations, and look at a long term sustainable charging system that does not disadvantage regional Australia.

Yours sincerely

JOHN TAYLOR
CHAIRMAN

Recent Changes in Airline and Airport Charges Methodology

Since the introduction of a location specific weight based charge on airlines for Tower and Airport Firefighting Services in 1998 the aviation industry dynamics have changed drastically.

- The effects of Sept 11 has demanded increased security at airports and on aircraft as well as increased insurance costs which is being reflected in passenger charges per sector. The Global Security Insurance Charge is presently $6.00 per sector per passenger and Qantas has a $1.69 charge for passenger screening per passenger per sector, regardless of the length of the sector or the fare paid..
- The collapse of Ansett resulted in an Ansett tax of $5.00 per passenger per sector with Virgin and $10.00 per ticket with Qantas for a couple of years.
- Shortly Qantas and Virgin Blue and other airlines will introduce a $6.00 per passenger per sector surcharge to cover increased fuel costs.
- Many Airports have moved from a weight based landing charge to a per passenger charge such as Gold Coast, Townsville, Proserpine, Hobart, Launceston, Proserpine, Mt Isa, Alice Springs, Darwin, Tennant Creek, Tamworth, Coffs Harbour, Mt Hotham and the capital city airports such as Brisbane and Sydney have passenger based charges for Passenger screening, Common user Terminals and international Terminals.
- As from 1st May 2003 the new regulations for provision of Aviation Fire & Rescue services was introduced on the basis of passenger movements. Any airport with over 350,000 passenger movements or with international services is required to have an ARFFS facility. This will mean such airports as Ayers Rock and Maroochydore will need to provide these services shortly and Hamilton Island in the near future.
- The advent of low cost carriers in Australia such as Virgin Blue, Jetstar, Pacific Blue, Tasman Express, Freedom air and to an extent Australia Airlines and other Asian Low cost carriers has and will further provide a dramatic increase in passenger movements.
- Aircraft dynamics have also changed with new generation Boeing 737 with 144 and 180 seats and Airbus A320 with 177 seats. There are now larger aircraft operating to many airports with a greater seat to MTOW ratio.
- Qantas offshoot Jetstar and Qantas have increased the seats on aircraft with the removal of business class. The Boeing 717 was a 102 seater with six business class and is now a 125 seater.

Conclusions

- **Passenger numbers are increasing dramatically but total MTOW of landings overall is a small increase.**
- **Airports and Airlines are more and more basing their charges on a user pays or set charge per sector passenger basis, regardless of the fare or distance of each sector.**
- **The General aviation community, aircraft over 2.5tonnes and freighter carriers who carry a very small number of passengers are subject to the present MTOW charges for ARRF at airports.**
- **International Carriers enjoy low costs of Tower and ARFFS services at the major gateways, whilst Qantas is subject to higher costs at overseas airports.**
- **Air Canada and Westjet in Canada recover Air Navigational system costs paid to NAV Canada via a per passenger per sector charge.**
- **A set per passenger per sector charge for ARFFS services seems to be a logical move given the latest trends in the industry and the charge would probably be around $2.40. Surely this is a neater, cleaner and very saleable model.**
- **Airservices would still be able to retain their present profit & loss accounting at individual locations to enable them to monitor and control costs.**
- **New regulations, use of the building block methodology and upgrade of the level at Mackay airport has location costs rising from around $1.8m to $2.9m to comply.**

Scheduled Services During ARFFS hours of coverage 0530 to 2055

	Effective		Tonnes	Yearly Tonnage		
Jetstar	25/05/2004	21 x B717-200 a week	52t	21x52tx52 weeks =	56784	
Jetstar	21/07/2004	4 x B717-200 a week	52t	4x52tx52 weeks	10816	
Qantas	25/05/2004	7 x B737-300 a week	52t	7x61tx 52 weeks	22204	
Virgin	19/03/2004	7 x B737-700 a week	70t	7x70t x 52 weeks	25480	
		7 x B737-800 a week	80t	7x80t x 52 weeks	29120	
Sunstate	31/03/2004	31 x Dash8-300 a week	19t	31 x 19t x 52 weeks	30628	**175032**
GA Traffic including freighters / SQ flying school over 2.5t				50t @day x 365 days	18250	
Total estimated					**193,282**	
Estimated by Airservices in their proposal					**167,000**	

167,000 tonnes @ $19.16 = **$3.2m which varies with the estimated revenue in their model of $2.9m**

Summary of Costs per Landing

	New	Present
Tower	$14.15 a tonne	$7.42
ARFFS	$19.16 a tonne	$9.98
Total	**$33.31 a tonne**	**$17.40 a tonne**

			Cost of Landing				Cost per Passenger	
Aircraft Type		New Charge	**New**	**Present**	**Seats**	Passengers @ 75% Load Factor	**New**	**Present**
Boeing 717 - 200	52t @	$33.31	$1,732	$905	125	94	$18.43	$9.62
Boeing 737-700	70t @	"	$2,332	$1,218	144	108	$21.59	$11.28
Boeing 737-800	80t @	"	$2,665	$1,392	180	135	$19.74	$10.31
Airbus A320 -200	74t @	"	$2,465	$1,288	177	133	$18.53	$9.68
DASH 8-300	20t @	"	$666	$348	50	38	$17.53	$9.16
Cessna 402	3.1t @	"	$103	$54	8	6	$17.17	$9.00