



Airport quality indicators - consultation paper

June 2022

Glossary

Selected terms used in the *Airports Act 1996* (the Act) and the *Airports Regulations 1997* (the regulations).

aspects of airport services and facilities	The ACCC has the function of monitoring and evaluating the quality of the aspects of airport services and facilities specified in the regulations: Part 1-Passenger-related services and facilities (for example, security inspection); and Part 2-Aircraft-related services and facilities (for example, runways). See subsection 155(1) of the Act and regulation 8.01A.
criteria	The monitoring and evaluation of an aspect must be against the criteria determined by the ACCC (for example, surveys of passengers of the rating of the security search process) See subsection 155 (2) of the Act, regulation 8.01A and the ACCC's Guideline for quality of service monitoring at airports – June 2014.
matter	An airport-operator company must keep records of each matter mentioned, for each financial year (for example, number of security clearance systems and total area of runways). The matters correspond to aspects of airport services and facilities. See subsection 156(1) of the <i>Airports Act 1996</i> , regulation 8.02 and Schedule 2 of the regulations.

Summary

The Australian Competition and Consumer Commission (ACCC) seeks submissions about the indicators the ACCC uses in monitoring and evaluating the quality of services and facilities at Brisbane, Melbourne, Perth and Sydney airports.

The ACCC monitors airport quality to promote transparency of airport services for which there is little or no competition.

The Australian Government has asked the ACCC to review the indicators.

In this paper you can find:

- background about the monitoring regime
- questions you may wish to consider and answer and
- advice on how to lodge your response.

We ask that you lodge submissions by 22 July 2022.

1. Purpose

The ACCC seeks submissions about indicators of airport quality

- 1.1. The Australian Competition and Consumer Commission (ACCC) seeks submissions about the indicators the ACCC uses in monitoring and evaluating the quality of services and facilities at airports.
- 1.2. The ACCC is empowered to monitor the quality of services and facilities (collectively referred to in this paper as 'airport quality') at the following airports:
 - Brisbane
 - Melbourne (Tullamarine)
 - Perth
 - Sydney (Kingsford-Smith)
 - Sydney West (also known as Western Sydney International, which is not yet operating).
- 1.3. This is a complement to the ACCC's monitoring of airports' financial indicators.
- 1.4. The Productivity Commission (PC) recommended that the ACCC should provide advice to the Australian Government on an updated set of quality-of-service indicators.ⁱ The PC advises the government on economic, social and environmental issues affecting the welfare of Australians. The Australian Government supported the recommendation and has asked the ACCC to review the indicators.ⁱⁱ

The ACCC plans to issue draft and final advice

- 1.5. The ACCC plans to conduct two rounds of consultation in this review.
- 1.6. In this first round, the ACCC invites submissions from airlines, airports and other parties with an interest in the issues. The ACCC invites interested parties to make comments in their submission on any aspect of the ACCC's monitoring of airport quality. Towards the end of this paper, you can find questions you may wish to consider and answer, and advice on lodging a response.
- 1.7. We ask that you lodge submissions by 22 July 2022.
- 1.8. At this stage, the ACCC plans to conduct a second phase of consultation in or about September this year.
- 1.9. As background to this indicative timeline, the ACCC's monitoring of airport quality takes place under legislation including the Airports Regulations 1997 (the regulations). The regulations are scheduled to 'sunset' on 1 April 2024. The Australian Government Department of Infrastructure, Transport, Regional Development and Communications (the Department of Infrastructure) is overseeing implementation of responses to the PC and reviewing the regulations.
- 1.10. In the context of the timing required to remake the regulations, the ACCC is scheduled to deliver draft advice on the airport quality indicators to the Department of Infrastructure in or about September 2022. The ACCC plans to consult stakeholders on the draft advice at that same time.

1.11. The ACCC is then scheduled to deliver its final advice to the Department of Infrastructure in or about November this year.

2. Background

The ACCC monitors quality to promote transparency of airport services

- 2.1. The ACCC monitors airport quality to promote transparency of airport services for which there is little or no competition. The ACCC's monitoring provides information on how airport quality is changing over time. This enables the ACCC to make general observations on whether monitored airports are taking advantage of the lack of competition.
- 2.2. To explain this further, Australia's major airports, and the ACCC's monitoring of them, operate under the *Airports Act 1996* (the Act). The objects of the Act include:
- to establish a system for the regulation of airports that has due regard to the interests of airport users and the general community
 - to promote the efficient and economic development and operation of airports
 - to facilitate the comparison of airport performance in a transparent manner.
- 2.3. In accordance with the Act, the ACCC has monitored quality at major Australian airports since 1997. The Australian Government introduced the monitoring of airports when it privatised them, as a complement to other regulation. The government privatised the airports with an intention to improve their efficiency. However, there was a concern that airport operators might be in a position to exercise market power (see **Appendix A** on market power and airports).ⁱⁱⁱ
- 2.4. The PC has observed that airport operators, if exercising market power, could, among other things:
- lower service quality below users' reasonable expectations for a given price – an airport could reduce staffing levels, alter the utilisation of inputs, or replace assets infrequently, to the detriment of service quality
 - underinvest in facilities, resulting in declining service quality over time.^{iv}
- 2.5. In 2002, based on advice from the Productivity Commission, the Australian Government replaced the price regulation regime with a price monitoring regime. The Australian Government maintained monitoring of airport quality as a complement to the new regime.
- 2.6. As the PC has observed, "monitoring can provide performance information to assess whether an airport operator has exercised its market power to the detriment of the community".^v Monitoring is usually considered a 'light-handed' option. Alternatives include the government intervening more heavily in the market to, for instance, set prices.^{vi}
- 2.7. Over the years, the Australian Government has periodically asked the PC to review the economic regulation of airports. The PC has regularly commented on monitoring of airport quality as part of its reviews (see **Appendix B** for a history).
- 2.8. The ACCC traditionally reported on airport quality alongside its reporting on financial indicators in the ACCC's annual Airport monitoring report. As explained below, we produce a quality rating, generating a 'time series' that can be used to consider whether airport quality is changing over time.

2.9. The ACCC uses this information with information on the financial performance of airports, to allow the ACCC to make general observations on whether the monitored airports are taking advantage of a lack of competition.

The current regime features many elements, to produce a single rating

- 2.10. The ACCC's evaluation of airport quality involves, in summary, the ACCC annually:
- receiving from the monitored airports records about certain *matters* corresponding to certain *aspects*, as specified in the regulations^{vii} (see **Appendices C and D**)
 - using *criteria* the ACCC has determined – being further objective data; and subjective data from surveys (see **Box 1** below and **Appendix E**) and
 - *rating* the quality of each airport's services, by aggregating the *matters* and *criteria* and so placing each airport along a scale of Very poor (rating under 1.5) to Excellent (4.5 and above).
- 2.11. To explain in more detail, the Act provides that the ACCC has the function of monitoring and evaluating the quality of the *aspects of airport services and facilities* specified in the regulations.^{viii} These *aspects* are listed in two tables in the regulations (see **Appendix C**):
- Part 1 – Passenger-related services and facilities – for example, security inspection.
 - Part 2 – Aircraft-related services and facilities – for example, runways.^{ix}
- 2.12. The Act provides, among other things, that the regulations may make provision for and about requiring a person to keep records on quality *matters*.
- 2.13. Schedule 2 of the regulations then specifies the *matters* corresponding to the *aspects* (see **Appendix C**). An airport-operator company must keep specified *records* about each *matter* mentioned, for each financial year. Examples include the number of security clearance systems and total area of runways.
- 2.14. The Act further provides that the monitoring and evaluation of an *aspect* must be against the *criteria* determined by the ACCC in relation to each *aspect*.^x

Box 1: Criteria determined by the ACCC

The ACCC outlines the *criteria* in the Guideline for quality of service monitoring – June 2014 (the ACCC guidelines).^{xi}

The ACCC divides the criteria into objective and subjective.

The objective data relates to the number or size of various facilities and throughput at those facilities. These include the number of passengers at peak hours, the number of aerobridges and the size of gate lounges. The ACCC converts these numbers and sizes to indicators of quality, such as the number of passengers per square metre of lounge area during peak hour; then converts these into a score.

The subjective information is based on surveys of passengers administered by the airports and surveys of airlines administered by the ACCC. The ACCC may also seek input from 'landside operators' such as transport businesses.

For the subjective information, each airport arranges passenger perception surveys. These surveys provide information consistent with that specified in the Airports Regulations 1997 and the ACCC guidelines but may differ in coverage and detail.

The areas covered include passenger check-in, security clearance, government inspection,

gate lounges, washrooms, baggage processing and trolleys, signage and wayfinding, and airport access for arriving and departing passengers.

The ACCC conducts an annual survey of airlines about their perception of the quality of facilities they used at the monitored airports. Questions relate to both terminal facilities (aerobridges, check-in and baggage processing) and airside facilities (runways, taxiways, aprons, aircraft gates and ground equipment sites). Airlines are asked to rate:

- availability—that is, the availability of infrastructure and equipment and the occurrence of delays in gaining access to those facilities. An assessment of availability gives an indication of whether airport operators are undertaking adequate investment in the capacity of services and facilities.
- standard—that is, the ability of equipment to perform the function intended, the equipment’s reliability and the probability of it breaking down. An assessment of standard indicates whether services or facilities meet users’ expectations.

Airlines are also asked to rate the airport operator’s responsiveness or approach to addressing problems and concerns with facilities.

2.15. The following table provides two examples of the chain of aspects, matters and criteria. For example, i) where regulation 8.01A specifies that the ACCC should monitor and evaluate the quality of runways, ii) regulation 8.02 and 8.03 Schedule 2 specify that the airport-operator company must report to the ACCC records of, for instance, the total area of runways; then iii) the ACCC evaluates these data against such criteria as total annual aircraft movements and the rating by airlines of the availability of the runways.

Table 1: Examples of aspects, matters and criteria

aspect	matter	criteria
as provided for in the regulations: 8.01A Aspects of airport services and facilities to be monitored and evaluated	as provided for in the regulations: Schedule 2 – Records relevant to quality of service matters, Part 2 - Table	as provided for in the ACCC Guideline for quality of service monitoring at airports, June 2014
2.3 Runways, taxiways and aprons (from Part 2 – Aircraft-related services and facilities)	10A Runways, taxiways and aprons 10A.1 Total area of aprons available (in square metres) on 30 June in the financial year 10A.2 Total	Runways, taxiways and aprons Objective criteria <ul style="list-style-type: none"> • Total annual aircraft movements per square metre of aprons available at 30 June in the financial year Subjective criteria <ul style="list-style-type: none"> • Airline surveys • Average rating of the availability of (separately) runways, taxiways and aprons • Average rating of the standard of (separately) runways, taxiways and aprons (from table 6.2: Quality of service aspects and associated criteria – aircraft-related services and facilities)

	area of runways (in square metres) on 30 June in the financial year	
1.5 Security inspection (from Part 1 – Passenger-related services and facilities)	<p>4 Security inspection</p> <p>4.1 Number of departing passengers for each security clearance system during peak hour in the financial year^{xii}</p> <p>4.2 Number of security clearance systems, including equipment required to process passengers and baggage, in use on 30 June in the financial year</p>	<p>Security inspection</p> <p>Objective criteria</p> <ul style="list-style-type: none"> • International services • Number of departing passengers per security clearance system during peak hour • Domestic services • Number of departing passengers per security clearance system during peak hour <p>Subjective criteria</p> <ul style="list-style-type: none"> • Passenger surveys • International services • Average rating of quality of security search process • Domestic services • Average rating of quality of security search process <p>(from table 6.1: Quality of service aspects and associated criteria – passenger-related services and facilities)</p>

2.16. The ACCC calculates the *rating* for aeronautical services by combining scores that the airport achieved against each of the specific airport quality measures, derived from the airline and passenger surveys and the objective indicators (matters and objective criteria).

2.17. This process largely consists of producing a set of benchmarks for each measure based on how the four airports performed against that measure. If an airport's performance against a particular measure is equal to the average performance across the four airports in that year, it will receive a score of 3 out of 5. If an airport performs better than the benchmark average, it will receive a score of 4 or 5 depending how close its performance is compared to the benchmark. Similarly, if its performance is below the benchmark, it will be rated 1 or 2.

2.18. That is, the benchmark is the average of the airports year to year.

2.19. Subjective data (customer satisfaction) is inputted raw on a five-point scale.

2.20. See **Attachment D** for more details on calculating the rating.

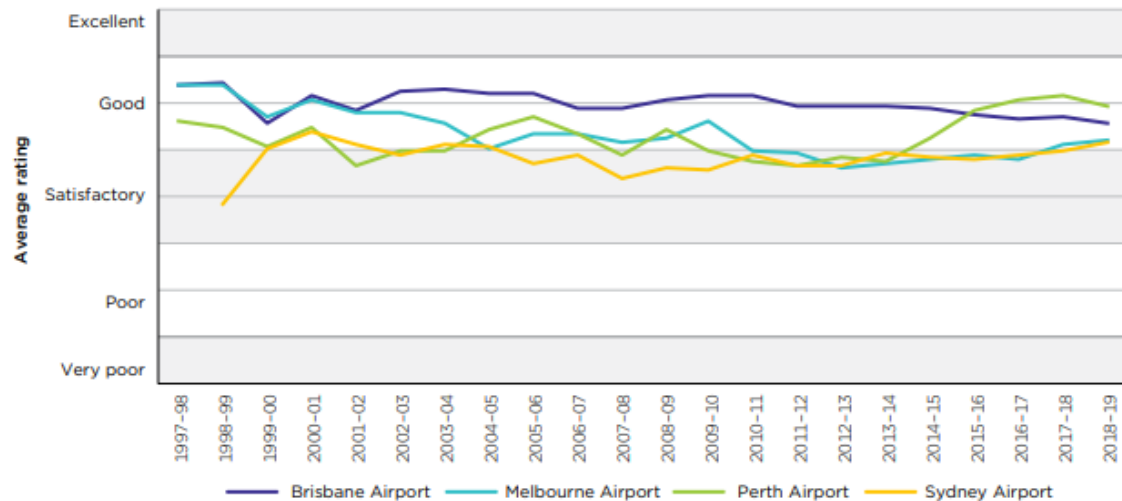
2.21. The ratings are reported in the ACCC's annual Airports monitoring report. See **Box 2** below for an example of the ACCC's commentary on airport quality, from the ACCC's most-recent Airports monitoring report.

Box 2: ACCC Airport monitoring report 2020-21, pp57-58^{xiii}

The ACCC has temporarily paused collecting quality of service data since 2018–19 due to the COVID-19 pandemic. The ACCC intends to resume collecting quality of service data as soon as possible, subject to consultation with the monitored airports.

Figure 4.2 shows the changes in quality of aeronautical services between 1997–98 and 2018–19.

Figure 4.2: Ratings of quality of aeronautical services, by airport: 1997-98 to 2018-19



Source: ACCC analysis of information received from monitored airports as part of the monitoring regime.

Figure 4.2 shows that the ratings of quality of aeronautical services across all monitored airports have either decreased slightly or remained relatively unchanged in the period between 1997–98 and 2018–19.

Focusing on the period between 2007–08 and 2018–19 (the same period as in figure 4.1):

- **Brisbane and Melbourne airports' ratings of quality of aeronautical services are about the same in 2018–19 as they were in 2007–08**
- Perth and Sydney airports' ratings of quality of aeronautical services increased in the period between 2007–08 and 2018–19. However, their ratings declined leading up to 2007–08, so their ratings in 2018–19 are on par with the ratings each of the airports achieved prior to 2007–08.

Collectively, the 4 monitored airports invested \$11.5 billion in tangible non-current aeronautical assets in real terms between 2007–08 to 2020–21...

The Productivity Commission recommended updating the indicators

2.22. In 2019 the PC recommended that the ACCC provide advice to the Australian Government on an updated set of quality indicators.^{xiv} This should be done in consultation with airports, airlines and other airport users and the Department of infrastructure (Recommendation 9.5, Economic Regulation of Airports (2019)^{xv}).

2.23. The PC concluded, among other things, that:

Service quality is a contested issue in terms of: the outcomes experienced by passengers and airlines; how it is incorporated into commercial agreements between airports and airlines...; and how it is measured in ACCC monitoring reports.

...the monitored airports performed well relative to overseas airports on measures of service quality as reported by passengers, but less favourably on measures reported by airlines. The [PC] concluded that airports were performing relatively well on service quality overall, but some inquiry participants disagreed...

...methodological issues and biases can limit the robustness of quality of service ratings under the monitoring regime. Among other improvements, quality of service monitoring should be updated to emphasise indicators that reflect outcomes that are valued by airport users (airlines and passengers), drawing on the indicators that airports and airlines use in service level agreements...^{xvi}

2.24. The PC considered that:

Average airline ratings are much more volatile than passenger ratings, which could be explained by low airline response rates. Further, the results do not distinguish between ratings for different groups who may have differing service quality expectations, for example, low-cost or full-service carriers, or business or leisure passengers. This limits the conclusions that can be drawn from the ratings...^{xvii}

2.25. The PC advocated 'more-relevant' monitoring and that once the ACCC had developed its recommended set of indicators, the government should amend schedule 2 of the Airports Regulations 1997 to codify the updated list.

2.26. The PC also reported the use by airlines and airports of service level agreements (SLAs) and key performance indicators (KPIs) to define levels of service quality.

2.27. With regard to SLAs, the PC reported that:

Defining service level outcomes through SLAs in negotiated agreements is international best practice ... SLAs can motivate airport operators to improve services and facilities, particularly in the context of ongoing growth in demand for air travel.

2.28. The PC further reported that,

In submissions to the [PC's] draft report, airports and airport investors were generally positive about the potential for using indicators in service level agreements as a basis for assessing the quality of airports' services.^{xviii}

2.29. With regard to KPIs, the PC reported that:

All monitored airports have developed or are negotiating KPIs of service quality...KPIs define expected levels of service quality and allow airport and airline operators to assess whether the services provided meet their expectations. Recently negotiated agreements include indicators such as on-time performance, queue time and baggage handling. Some airport operators have also included KPI results in consultation processes and capital development plans in order to align their future investments with identified service quality issues.^{xix}

2.30. In its latest Airports monitoring report, the ACCC notes some of the issues concerning the interpretation of its results on airport quality:

A variety of factors outside the immediate control of the airport operator may influence the quality of service results. For example, the staffing and provision of IT equipment for check-in services by airlines and the staffing by the on-airport government border

agencies may affect the quality of experience for passengers as they pass through an airport. This in turn may influence those passengers' ratings of the airport. Airservices Australia, airlines and other service providers may also affect quality outcomes such as causing delays in aircraft departure.

In addition, investment in terminal infrastructure is 'lumpy' and there may be a lag between an increase in passenger and flight numbers and an increase in the capacity of airport infrastructure. Such a lag could highlight capacity constraints reflected in the quality of service indicators and therefore identify areas for increased investment.^{xx}

2.31. The Australian Government supported the PC's 2019 recommendation. In June 2022, the Department of Infrastructure asked the ACCC to review the indicators.^{xxi} The Australian Government has said that a review is warranted to identify a contemporary set of indicators reflecting the outcomes valued by airport users. It considered that the indicators should:

- more closely reflect the expectations of passengers, airlines and other airport users and
- have a greater focus on outcomes.

3. Scope and issues

3.1. In conducting this review, the ACCC plans to proceed on the basis that:

- The ACCC's ratings of airport quality since 1997, and particularly ratings since the ACCC issued revised guidelines in 2014, can provide information about trends over time. There is value in collecting the same information over time, as time-series data.
- The quality of a service should not be considered in isolation from its price; and, similarly, the objectives and nature of the ACCC's monitoring and evaluation of airport quality and airport prices, costs and profits should remain aligned.

3.2. The PC has observed that the monitoring regime "should target the scope of services where the potential exercise of market power is a concern".^{xxii} The focus of this review will be on those services and facilities that facilitate aircraft movements (for example, runways) and passenger processing (for example, security inspections). It will not be on such things as food and retail services in terminals.^{xxiii}

3.3. This paper has explained above, and detailed in the attachments, the framework of specified services and facilities, aspects, matters and criteria that form the basis for the ACCC's rating of airport quality.

3.4. The Department of Infrastructure has specifically asked the ACCC to review the current record-keeping and reporting requirements, including the following elements of the Airport Regulations 1997:

- Part 8 – Quality of service monitoring, which lists the aspects, and
- Schedule 2 – Records relevant to quality of service matters, which lists the matters.

3.5. As explained, the ACCC also determines and uses its own criteria, often effectively in interaction with the matters.

3.6. This review extends to consideration of the aspects, matters and criteria.

3.7. The ACCC invites stakeholders to engage with the detail and specifics of the currently specified services and facilities, aspects, matters and criteria; and the calculation and presentation of the airport quality ratings.

- 3.8. The ACCC invites submissions to specify components of the monitoring and evaluation regime on which the ACCC should most intensely focus. This may be, for example, due to the total dollar value of the service or facility provided and / or how critical and necessary it is to the operation and maintenance of civil aviation.
- 3.9. There may be currently specified services and facilities, aspects, matters and / or criteria that the ACCC is directed to (or, in the case of the criteria, it has determined to) take into account now but that it should not continue to do so. For example, they may not be relevant enough to the aims of monitoring and evaluation; or the cost of including them outweighs their value to the evaluation exercise. The ACCC's invitation to make submissions therefore also includes an invitation to make submissions on rationalisation of the components of the monitoring regime.

4. Submissions

- 4.1. The ACCC seeks submissions about the indicators the ACCC uses in monitoring and evaluating the quality of services and facilities at airports.
- 4.2. Towards this, you may wish to consider parameters such as:
- the selected objects of the *Airports Act 1996* extracted towards the start of this paper
 - the ACCC's aims in monitoring and evaluating airport quality – to measure how airport quality is changing over time for the purpose of making general observations on whether monitored airports are taking advantage of lack of competition
 - the Australian Government's wish to identify a contemporary set of indicators reflecting the outcomes valued by airport users.
- 4.3. The **Questions** section below sets out example questions you may wish to consider, and to which you may wish to respond in your submission.
- 4.4. We ask that you lodge submissions by 22 July 2022.

This is a public review

- 4.5. To facilitate an informed, transparent and robust consultation process, the ACCC prefers that all submissions be made publicly available. Accordingly, submissions will be treated as public documents and published on the ACCC's website unless a claim for confidentiality is made and accepted, or a submission is withdrawn.
- 4.6. Parties wishing to submit confidential information are requested to:
- note this when submitting via the consultation hub (or in the covering email)
 - clearly identify the information that is subject to the claim for confidentiality
 - provide a non-confidential version of the submission.
- 4.7. If the ACCC accepts your confidentiality claim, it will not publish or disclose the confidential information to third parties, without first endeavouring to provide you with notice of its intention to do so, wherever possible, such as where it is compelled to do so by law. It is important to note that the ACCC may share confidential information internally with ACCC and Australian Energy Regulator staff and with its external lawyers and consultants.
- 4.8. If the ACCC rejects your confidentiality claim, you will be given the opportunity to withdraw your submission before it is published, or any information is disclosed.

4.9. The [ACCC's information policy](#) includes further information on the collection and disclosure of information.

Lodge your response through the ACCC's consultation hub

4.10. Interested parties are encouraged to upload submissions using the link available on the ACCC's consultation hub <https://consultation.accc.gov.au/>

4.11. Or submissions can be emailed to: airportsandports@acc.gov.au

Questions

This section offers example questions you may wish to consider, and to which you may wish to respond in your submission. Please select those most applicable to the scope of your submission – we do not require you to consider or respond to them all.

Wherever possible, please provide specific examples to illustrate answers.

Use

1. Do you make use of the ACCC's monitoring and evaluation of airport quality? If yes, how and why? If not, why not?
2. Is the ACCC's monitoring and evaluation of airport quality 'fit for purpose' or 'working'? If yes, how and why? If no, why not? What would be the measures and gauges of success or failure of the monitoring and evaluation of airport quality?
3. To what extent, if any, and with regard to any particular airport or airports, has the ACCC's monitoring and evaluation of airport quality contributed to:
 - a. promoting the interests of passengers?
 - b. promoting the interests of airlines?
 - c. promoting efficiency
 - i. in operations?
 - ii. in development?
 - d. detecting instances of the exercise of market power?
 - e. deterring instances of the exercise of market power?
4. To what extent have the ACCC's ratings of airport quality been a significant factor, or been referenced, in bargaining between airlines and airports?
5. How can and should the ACCC best use ratings of the *quality* of airport services and facilities in conjunction with its monitoring of the *prices, costs and profits* related to the supply of aeronautical services and facilities by airports?
6. To what extent are airlines good 'agents' for promoting the interests of passengers travelling through airports. Why?

Expectations and outcomes

7. What has changed in the past 10 years in the nature of the services and facilities passengers and airlines need or value and / or airports provide? For example, how should the monitoring evolve in the face of technological change, such as online check ins or access to information and notifications on personal electronic devices?
8. What outcomes do *passengers* and, separately, *airlines* now most need, and / or value, when using airport services and facilities? Why? You may wish to specify, for instance, issues such as on-time departure, efficient security inspections, reliable baggage handling or the availability and quality of runways.
9. How would you measure the outcomes you have identified? What are the indicators that their quality is high or low?
10. Do the answers differ if the airport user is:
 - a. an international or domestic traveller?
 - b. an international or domestic airline?

- c. an airline, or a traveller that is using an airline, that is a full-service or low-cost carrier?
 - d. a leisure or business traveller?
 - e. any other characterisation of passenger or flight, such as arriving or departing?
11. Can and should the ACCC monitor and evaluate flight *delays* at airports as part of monitoring and evaluating airport quality? Why or why not? To what extent, if any, is the ACCC's current monitoring and evaluation directly or indirectly addressing delay issues?
 12. Should, or how should, the ACCC monitor and evaluate the service to, and the facilities for, passengers with special needs: such as people with a disability or from disadvantaged, vulnerable or culturally and linguistically diverse backgrounds? How does this aspect of monitoring and evaluation fit within the overall aim or aims that you consider the monitoring regime should pursue?
 13. Are there any areas included in the ACCC's reporting of airport quality over which airport operators do not have enough control or responsibility to justify their inclusion? What is your view on whether certain elements should be excluded from monitoring and evaluation for this reason?
 14. Overall:
 - a. What are the most important performance measures in airport quality in terms of reliability, quality of supply and customer services?
 - b. What is the best framework to align customer expectations with service performance?

Specific services and facilities, aspects and matters

15. Are there any *aeronautical services or facilities* listed in Regulation 7.02A that are not incorporated into the aspects listed in Schedule 2 but are as significant as, or more significant than, the aspects listed in Schedule 2 – and so should be listed there?
16. What are the top three to five aspects listed in Schedule 2, or that you consider should be listed in Schedule 2, that should receive the most attention from the ACCC in monitoring and evaluating airport quality (for example, being weighted more heavily or retained in a shorter, rationalised list of items)? Why?
17. What are your views, if any, on the use and specifics of the definition of 'peak hour' in Schedule 2?
18. Can and should the ACCC monitor and evaluate the quality of aircraft refuelling services and facilities? Why or why not?
19. Compared with other airport services and facilities, how important are airport carparking facilities to promoting positive outcomes for passengers using airports?
20. Please list in order of highest to lowest dollar value, the top three to five airport services or facilities by:
 - a. cost for an airline / revenue for an airport
 - b. cost for an airport
 - c. margin or profit for an airport.
21. With regard to the aspects you identified in answer to question 16 above, what are the key matters the ACCC should take into consideration towards monitoring and evaluating the quality of the aspect?

22. In light of your answers to earlier questions, what amendments, if any, should the Australian Government make to Schedule 2? Why?

Criteria and reporting of results

23. What are your views of the criteria for the ACCC's quality monitoring program, as outlined in the ACCC's Guideline for quality of service monitoring at airports – June 2014? You may wish to comment on, for example:

- a. what subjective and objective information the ACCC uses
- b. who the information is collected from, who collects it and how it is collected.

24. In light of your answers to earlier questions, what changes, if any, can and should the ACCC make to its criteria? Why?

25. What are your views of the ratings the ACCC has published in its annual Airport monitoring reports of airport quality? You may wish to comment on, for example:

- a. the extent to which the ratings help achieve the aims of the ACCC's monitoring of airport quality
- b. aspects of methodology, such as:
 - i. benchmarking an airport against the average of monitored airports
 - ii. whether other comparators, variables or inputs should contribute to calculating any benchmark – for instance, selected overseas airports
 - iii. producing a single indicator (a rating along a five-point scale), including one that applies to all services and facilities; and all types of passengers and airlines (such as international and domestic, and full-service and low-cost travel).

26. In light of your answers to earlier questions, what changes, if any, can and should the ACCC make to its ratings methodology and presentation?

27. Does the ACCC publish an appropriate level of detail on airport quality? For example, should the ACCC publish more disaggregated information, for more transparency? If yes, what is this likely to achieve and why?

28. Overall:

- a. What is your view on the appropriateness of performance measures included in recent ACCC Airport monitoring reports?
- b. Should the ACCC adopt other established quality measures for its monitoring report, to analyse an airport's performance and benchmark it against other local and overseas airports – for example, the Airport Service Quality survey from Airports Council International?
- c. Given your answers to the questions above, what changes should be made to the quality data collection requirements, including the scope of the aspects, matters and criteria?

APPENDIX A

Market power and airports

Market power is often described in lay terms as, for example: the ability of a business to be insulated from competition – to behave with little regard to what its competitors (if any), suppliers or customers do;^{xxiv} or the ability to ‘give less and / or charge more’, reasonably free of challenges or ‘constraints’ to it doing so.

It is generally accepted that many airports in Australia are regional natural monopolies. Due to economies of scale (advantages in being large) and scope (advantages in offering many services), there is usually only one large airport in a region.

These airports typically have market power, as they do not face effective competition from other airports for provision of, for instance, regular passenger transport services in the region.^{xxv}

The extent of that market power depends, in part, on how essential the airport is to those seeking to use it. Airports that act as a critical ‘hub’ for economic activity typically have substantial market power. The PC has found in its inquiries that at least the four airports the ACCC currently monitors, as listed above, have significant market power.^{xxvi}

Each airport seeks to maximise its profits – just as any other private business in Australia has an incentive to do. Airports, as monopolies not constrained by competition, can seek to maximise profits by charging ‘monopoly prices’, while limiting output and service levels. Airports may also under- or over-invest in their infrastructure; and may lack incentives to operate efficiently or to adopt innovative technologies and service models. Such actions hamper productivity and lead to efficiency losses, to the detriment of consumers and the broader Australian economy.

APPENDIX B

Selected history of ACCC airport-quality monitoring^{xxvii}

Year	Development
1997	The ACCC begins monitoring quality at major Australian airports
2002	In response to a PC inquiry, the government supported a review of quality indicators. The ACCC undertook a review and issued a revised guideline.
2004	The government began reviewing the Airports Act. The ACCC issued revised guidelines for quality monitoring.
2006-2008	The PC conducted a further inquiry and recommended the ACCC improve and streamline quality monitoring and consider the possibility of international benchmarking. The ACCC changed some of the processes for surveying airport users (see below about surveys), which were reflected in updated guidelines.
2011-2014	Following a PC inquiry in 2011, the government asked the ACCC to review and update some of the ACCC's quality criteria. The ACCC consulted the public and issued new guidelines in 2014.
2019	The PC recommended that the ACCC should provide advice to the government on an updated set of quality indicators. The COVID-19 pandemic delayed planned implementation of the government's response to the recommendation.
2022	The Department of Infrastructure is now progressing this work, resulting in this review.

APPENDIX C

Airports Regulations 1997

8.01A Aspects of airport services and facilities to be monitored and evaluated

For subsection 155(1) of the Act, the aspects of airport services and facilities mentioned in the following table are specified.

Part 1—Passenger-related services and facilities

Item	Services and facilities
	<i>Access</i>
1.1	Airport access facilities (taxi facilities, kerbside space for pick-up and drop-off)
1.2	Car parking service facilities
1.3	Baggage trolleys
	<i>Departure</i>
1.4	Check-in services and facilities
1.5	Security inspection
1.6	Outbound baggage system
	<i>Arrival</i>
1.7	Baggage make-up, handling and reclaiming services and facilities
	<i>Departure and arrival</i>
1.8	Facilities to enable the processing of passengers through customs, immigration and quarantine
	<i>Information and signage</i>
1.9	Flight information, general signage and public-address systems
	<i>Terminal facilities</i>
1.10	Public areas in terminals and public amenities (washrooms and garbage bins), lifts, escalators and moving walkways
1.11	Gate lounges and seating other than in gate lounges

Part 2—Aircraft-related services and facilities

Item	Services and facilities
2.1	Ground handling services and facilities

2.2	Aerobridge usage
2.3	Runways, taxiways and aprons
2.4	Aircraft parking facilities and bays
2.5	Airside freight handling, storage areas and cargo facilities

APPENDIX D

Airports Regulations 1997

Schedule 2-Records relevant to quality of service matters

Part 2—Table

Item	Aspects of airport services and facilities to which records are relevant	Matters about which airport-operator companies must keep records
1A	Airport access facilities (taxi facilities, kerbside space for pick-up and drop-off)	<p>1A.1 Total area (international and domestic) at terminal kerbside for passenger pick-up and drop-off to landside operators such as taxis, and providers of other off-airport parking services, measured in terms of the number of standard car park spaces</p> <p>1A.2 Total area (international and domestic) at terminal kerbside and at designated waiting areas for passenger pick-up and drop-off provided to the public at no charge measured in terms of the number of standard car park spaces</p>
1	Car parking service facilities	<p>1.1 Number of car parking spaces available to the public in the vicinity of the airport (including disabled parking) on 30 June in the financial year</p> <p>1.2 Distance (in metres) between the nearest public car park and the terminal entrance nearest to that car park on 30 June in the financial year</p> <p>1.3 Number of days the car park was open during the financial year</p> <p>1.4 Number of vehicles that used the car park in the financial year</p>
2	Baggage trolleys	<p>2.1 Average number of passengers for each baggage trolley during peak hour in the financial year</p> <p>2.2 Number of baggage trolleys on 30 June in the financial year</p>
3	Check-in services and facilities	<p>3.1 Number of check-in desks on 30 June in the financial year</p> <p>3.2 Number of bag-drop facilities on 30 June in the financial year</p> <p>3.3 Number of spaces provided for check-in kiosk facilities on 30 June in the financial year</p>
4	Security inspection	<p>4.1 Number of departing passengers for each security clearance system during peak hour in the financial year</p> <p>4.2 Number of security clearance systems, including equipment required to process passengers and baggage, in use on 30 June in the financial year</p>
5	Outbound baggage system	<p>5.1 Average number of bags handled by the outbound baggage system during peak hour in the financial year</p> <p>5.2 Total number of bags handled by baggage handling equipment in the financial year</p> <p>5.3 Total number of hours during the financial year for which</p>

		<p>baggage handling equipment was in use</p> <p>5.4 Capacity of baggage handling equipment (in bags per hour) on 30 June in the financial year</p>
6	Baggage make-up, handling and reclaiming services and facilities	<p>6.1 Total number of bags handled by baggage handling equipment in the financial year</p> <p>6.2 Total number of hours during the financial year for which baggage handling equipment was in use</p> <p>6.3 Capacity of the baggage handling equipment (in bags per hour) on 30 June in the financial year</p> <p>6.4 Capacity of the baggage reclaim system on 30 June in the financial year</p> <p>6.5 Average number of bags handled by the inbound baggage system during peak hour in the financial year</p> <p>6.6 Total number of planned interruptions to inbound baggage system in the financial year</p> <p>6.7 Total number of hours of planned interruptions to inbound baggage system in the financial year</p> <p>6.8 Total number of unplanned interruptions to inbound baggage system in the financial year</p> <p>6.9 Total number of hours of unplanned interruptions to inbound baggage system in the financial year</p>
		6.10 Total area (in square metres) provided by the airport operator for baggage reclaim on 30 June in the financial year
7	Facilities to enable the processing of passengers through customs, immigration and quarantine	<p>7.1 Average number of arriving passengers during peak hour in the financial year</p> <p>7.2 Number of inbound Immigration desks on 30 June in the financial year</p> <p>7.3 Number of baggage inspection desks on 30 June in the financial year</p> <p>7.4 Number of outbound Immigration desks on 30 June in the financial year</p>
8	Flight information, general signage and public-address systems	<p>8.1 Average number of passengers (whether arriving or departing passengers) during peak hour in the financial year</p> <p>8.2 Number of flight information display screens on 30 June in the financial year</p> <p>8.3 Number of information points on 30 June in the financial year</p>
8A	Public areas in terminals and public amenities (washrooms and garbage bins), lifts, escalators and moving walkways	8A.1 Number of washrooms on 30 June in the financial year
9	Gate lounges and seating other than in gate lounges	<p>9.1 Average number of departing passengers during peak hour in the financial year</p> <p>9.2 Number of gate lounges on 30 June in the financial year</p> <p>9.3 Number of seats in gate lounges on 30 June in the financial year</p> <p>9.4 Total gate lounge area (in square metres) on 30 June in the financial year</p>

		9.5 Number of airport-operator-managed gate lounges on 30 June in the financial year
		9.6 Number of seats in airport-operator-managed gate lounges on 30 June in the financial year 9.7 Number of seats in airport-operator-managed waiting areas (other than in gate lounges) on 30 June in the financial year
10	Aerobridge usage	10.1 Number of passengers who used aerobridges for embarkation in the financial year 10.2 Total number of passengers who embarked in the financial year 10.3 Number of passengers who used aerobridges for disembarkation in the financial year 10.4 Total number of passengers who disembarked in the financial year 10.5 Number of aerobridges on 30 June in the financial year 10.6 Percentage of passengers who used aerobridges for embarkation in the financial year 10.7 Percentage of passengers who used aerobridges for disembarkation in the financial year
10A	Runways, taxiways and aprons	10A.1 Total area of aprons available (in square metres) on 30 June in the financial year 10A.2 Total area of runways (in square metres) on 30 June in the financial year
11	Aircraft parking facilities and bays	11.1 Number of aircraft parking bays on 30 June in the financial year 11.2 Total area of aircraft parking bays available (in square metres) on 30 June in the financial year

APPENDIX E

ACCC Guideline for quality of service monitoring at airports – June 2014

Table 6.1: Quality of service aspects and associated criteria – passenger-related services and facilities

Aspect	Subjective Criteria			
	Objective criteria	Passenger surveys	Airline surveys	Other surveys
Airport access facilities (taxi facilities, kerbside space for pick-up and drop-off)	<p>International services</p> <p>Capacity of terminal kerbside services and facilities designated for passenger pick up and drop off provided to landside operators such as taxis, and providers of other off-airport parking services, measured in terms of the number of standard car park spaces.⁶</p> <p>Capacity of services and facilities designated for passenger pick-up and drop-off provided to the public at no charge measured in terms of the number of standard car park spaces.</p> <p>Domestic services</p> <p>Capacity of terminal kerbside services and facilities designated for passenger pick-up and drop-off provided to landside operators such as taxis, and providers of other off-airport parking services, measured in terms of the number of standard car park spaces.⁷</p> <p>Capacity of services and facilities designated for passenger pick-up</p>	<p>International services</p> <p>Average rating of kerbside taxi pick-up and drop-off facilities</p> <p>Average rating of taxi facilities waiting time</p> <p>Average rating of kerbside space congestion</p> <p>Domestic services</p> <p>Average rating of kerbside taxi pick-up and drop-off facilities</p> <p>Average rating of taxi facilities waiting time</p> <p>Average rating of kerbside space congestion</p>	<p>International services</p> <p>Nil</p> <p>Domestic services</p> <p>Nil</p>	<p>International services</p> <p><u>Landside operators:</u></p> <p>Average rating of the availability and standard of taxi facilities</p> <p>Average rating of the availability and standard of kerbside space for pick-up and drop-off.</p> <p>Average rating of the overall system for addressing quality of service concerns.</p> <p>Average rating of management approach to concerns.</p> <p>Domestic services</p> <p><u>Landside operators:</u></p> <p>Average rating of the availability and standard of taxi facilities</p> <p>Average rating of the availability and standard of kerbside space for pick-up and drop off.</p> <p>Average rating of the overall system for addressing quality of service concerns.</p> <p>Average rating of management</p>

⁶ A standard car park space measures 5.4 metres, Australian / New Zealand Standard (2004), *Parking facilities Part 1: Off-street car parking*, page 12, Standards Australia International Ltd.

Aspect	Subjective Criteria			
	Objective criteria	Passenger surveys	Airline surveys	Other surveys
	and drop-off provided to the public at no charge measured in terms of the number of standard car park spaces.			approach to concerns.
Car parking service facilities	<p>International services</p> <p>Average daily throughput of short-term car park</p> <p>Average daily throughput of long-term car park</p> <p>Domestic services</p> <p>Average daily throughput of short-term car park</p> <p>Average daily throughput of long-term car park</p>	<p>International services</p> <p>Average rating of airport car parking availability</p> <p>Average rating of airport car parking standard</p> <p>Average rating of time taken to enter airport car park</p> <p>Domestic services</p> <p>Average rating of airport car parking availability</p> <p>Average rating of airport car parking standard</p> <p>Average rating of time taken to enter airport car park</p>	<p>International services</p> <p>Nil</p> <p>Domestic services</p> <p>Nil</p>	<p>International services</p> <p>Nil</p> <p>Domestic services</p> <p>Nil</p>
Baggage trolleys	<p>International services</p> <p>Number of passengers per baggage trolley during peak hour^B</p> <p>Domestic services</p> <p>Number of passengers per baggage trolley during peak hour^B</p>	<p>International services</p> <p>Average rating of find ability of baggage trolleys</p> <p>Domestic services</p> <p>Average rating of find ability of baggage trolleys</p>	<p>International services</p> <p>Nil</p> <p>Domestic services</p> <p>Nil</p>	<p>International services</p> <p>Nil</p> <p>Domestic services</p> <p>Nil</p>

^B For this aspect, the ACCC considers 'peak hour' to be defined as 'the hour that, on average for each day in the financial year, has the highest total number of passenger movements (including both arriving and departing passengers)'.

Aspect	Subjective Criteria			
	Objective criteria	Passenger surveys	Airline surveys	Other surveys
Check-in services and facilities	<p>International services</p> <p>The number of departing passengers per: check-in desks, bag-drop facilities and spaces provided for check-in kiosks during peak hour¹⁰</p> <p>Domestic services</p> <p>The number of departing passengers per: check-in desks, bag-drop facilities and spaces provided for check-in kiosks during peak hour¹¹</p>	<p>International services</p> <p>Average rating of check-in waiting time</p> <p>Domestic services</p> <p>Average rating of check-in waiting time</p>	<p>International services</p> <p>Average rating of availability of check-in services and facilities</p> <p>Average rating of standard of check-in services and facilities</p> <p>Domestic services</p> <p>Average rating of availability of check-in services and facilities</p> <p>Average rating of standard of check-in services and facilities</p>	<p>International services</p> <p>Nil</p> <p>Domestic services</p> <p>Nil</p>
Security inspection	<p>International services</p> <p>Number of departing passengers per security clearance system during peak hour¹²</p> <p>Domestic services</p> <p>Number of departing passengers per security clearance system during peak hour¹³</p>	<p>International services</p> <p>Average rating of quality of security search process</p> <p>Domestic services</p> <p>Average rating of quality of security search process</p>	<p>International services</p> <p>Nil</p> <p>Domestic services</p> <p>Nil</p>	<p>International services</p> <p>Nil</p> <p>Domestic services</p> <p>Nil</p>
Outbound baggage system	<p>International services</p> <p>Average throughput of outbound</p>	<p>International services</p>	<p>International services</p> <p>Average rating of the availability</p>	<p>International services</p>

Aspect	Subjective Criteria			
	Objective criteria	Passenger surveys	Airline surveys	Other surveys
	baggage system during peak hour ¹⁴ Total time that the outbound baggage system was interrupted Domestic services Average throughput of outbound baggage system during peak hour ¹⁵ Total time that the outbound baggage system was interrupted	Nil Domestic services Nil	of baggage processing facilities Average rating of the standard of baggage processing facilities Domestic services Average rating of the availability of baggage processing facilities Average rating of the standard of baggage processing facilities	Nil Domestic services Nil
Baggage make-up, handling and reclaiming services and facilities	International services Average throughput of inbound baggage system during peak hour ¹⁶ Total area (in square metres) provided by the airport operator for baggage reclaim Total time the inbound baggage system was interrupted Domestic services Average throughput of inbound baggage system during peak hour ¹⁷	International services Average rating of information display for inbound baggage reclaim Average rating of circulation space for inbound baggage reclaim Domestic services Average rating of information display for inbound baggage reclaim Average rating of circulation space for inbound baggage	International services Average rating of the availability of baggage processing facilities Average rating of the standard of baggage processing facilities Domestic services Average rating of the availability of baggage processing facilities Average rating of the standard of baggage processing facilities	International services Nil Domestic services Nil

Aspect	Subjective Criteria			
	Objective criteria	Passenger surveys	Airline surveys	Other surveys
	Total area (in square metres) provided by the airport operator for baggage reclaim ¹⁸ Total time the inbound baggage system was interrupted	reclaim		
Facilities to enable the processing of passengers through customs, immigration and quarantine	International services Number of inbound Immigration desks on 30 June in the financial year Number of baggage inspection desks on 30 June in the financial year Number of outbound Immigration desks on 30 June in the financial year	International services Nil	International services Nil	International services Nil
Flight information, general signage and public-address systems	International services Number of passengers per flight information display screen during peak hour ¹⁹ Number of passengers per information point during peak hour ²⁰ Domestic services Number of passengers per flight	International services Average rating of flight information display screens Average rating of signage and wayfinding Domestic services Average rating of flight information display screens Average rating of signage and	International services Nil Domestic services Nil	International services Nil Domestic services Nil

Aspect	Subjective Criteria			
	Objective criteria	Passenger surveys	Airline surveys	Other surveys
	information display screen during peak hour ²¹ Number of passengers per information point during peak hour ²²	wayfinding		
Public areas in terminals and public amenities (washrooms and garbage bins), lifts, escalators and moving walkways	International services Number of passengers per washroom during peak hour ²³ Domestic services Number of passengers per washroom during peak hour ²⁴	International services Average rating of the standard of washrooms Domestic services Average rating of the standard of washrooms	International services Nil Domestic services Nil	International services Nil Domestic services Nil
Gate lounges and seating other than in gate lounges	International services Number of departing passengers per seat in gate lounges during peak hour ²⁵ Number of departing passengers per square metre of gate lounge area during peak hour ²⁶ Domestic services Number of departing passengers	International services Average rating of quality and availability of seating in lounge area Average rating of crowding in lounge area Domestic services Average rating of quality and availability of seating in lounge	International services Nil Domestic services Nil	International services Nil Domestic services Nil

Aspect	Subjective Criteria			
	Objective criteria	Passenger surveys	Airline surveys	Other surveys
	per seat in gate lounges during peak hour ²⁷ Number of departing passengers per square metre of gate lounge area during peak hour ²⁸	area Average rating of crowding in lounge area		
Airport management responsiveness	Nil	Nil	Average rating of overall responsiveness or approach to addressing quality of service problems or concerns	<u>Landside:</u> Average rating of management approach to concerns.

Table 6.2: Quality of service aspects and associated criteria – aircraft-related services and facilities

Aspect	Subjective Criteria			
	Objective criteria	Passenger surveys	Airline surveys	Other surveys
Ground handling services and facilities	Nil	Nil	Average rating of the availability of ground handling services and facilities Average rating of the standard of ground handling services and facilities	Nil
Aerobridge usage	<p>International services</p> <p>Percentage of international passengers arriving using an aerobridge</p> <p>Percentage of international passengers departing using an aerobridge</p> <p>Domestic services</p> <p>Percentage of domestic passengers arriving using an aerobridge</p> <p>Percentage of domestic passengers departing using an aerobridge</p>	<p>International services</p> <p>Nil</p> <p>Domestic services</p> <p>Nil</p>	<p>International services</p> <p>Average rating of the availability of aerobridges</p> <p>Average rating of the standard of aerobridges</p> <p>Domestic services</p> <p>Average rating of the availability of aerobridges</p> <p>Average rating of the standard of aerobridges</p>	<p>International services</p> <p>Nil</p> <p>Domestic services</p> <p>Nil</p>
Runways, taxiways and aprons	Total annual aircraft movements per square metre of aprons available at 30 June in the financial year	Nil	Average rating of the availability of runways Average rating of the standard of runways	Nil

Aspect	Subjective Criteria			
	Objective criteria	Passenger surveys	Airline surveys	Other surveys
	Total annual aircraft movements per square metre of runways at 30 June in the financial year		Average rating of the availability of taxiways Average rating of the standard of taxiways Average rating of the availability of aprons Average rating of the standard of aprons	
Aircraft parking facilities and bays	Total annual aircraft movements per square metre for aircraft parking bays on 30 June in the financial year	Nil	Average rating of the availability of aircraft parking facilities and bays Average rating of the standard of aircraft parking facilities and bays	Nil
Airside freight handling, storage areas and cargo facilities	Nil	Nil	Average rating of the availability of airside freight handling, storage areas and cargo facilities Average rating of the standard of airside freight handling, storage areas and cargo facilities	Nil

APPENDIX F

Calculating overall quality of aeronautical service ratings for each airport

Source: ACCC, Airports monitoring report 2020-21, p134

For each airport, the ACCC calculates a single overall quality of service rating in relation to total services at the airport. As for each of the many specific measures of quality of service, the overall rating is a score out of 5. A score of between 1 and 1.49 represents 'very poor' performance, while a score between 4.50 and 5 represents 'excellent' performance.

The overall rating is calculated using a combination of the results from airline surveys, passenger surveys, and objective indicators (for example, the number of departing passengers per check-in desk, kiosk and bag drop facility during peak hour).

The overall rating is the simple average of the scores that the airport achieved against each of the specific quality of service measures from airline surveys, passenger surveys and objective indicators. For example, Sydney Airport scored an average of 3.60 across 105 performance measures in 2018–19. Among those measures, 30 were obtained from airline surveys, 48 were from passenger surveys and the remaining 27 were objective indicators.

While airports' performance against the quality of service measures in the airline surveys and passenger surveys are already rated as scores out of 5, ratings of performance against objective indicators need to be calculated.

This process consists of producing a set of benchmarks for each measure based on how the 4 airports performed against that measure. If an airport's performance against that measure is equal to the average performance across the 4 airports in that year, it will receive a score of 3 out of 5. If an airport performs better than the benchmark average, it will receive score of 4 or 5 depending how close its performance is compared to the benchmark. Similarly, if its performance is below the benchmark, it will be rated 1 or 2.

An implication of this methodology is that an airport's rating with respect to objective indicators is relative to that of the other 3 airports. This means an airport can report the same raw performance figures to the ACCC as the previous year but find its rating for that measure going up or down. It also means that it is not possible for all airports to be rated highly or rated poorly. This is not the case for an airport's ratings based on airline and passenger surveys, which are independent of ratings given to the other airports.

ENDNOTES

- ⁱ Recommendation 9.5, PC, Economic Regulation of Airport Services, Productivity Commission Inquiry Report No.92, 21 June 2019, pp42-43, available at <https://www.pc.gov.au/inquiries/completed/airports-2019/report>
- ⁱⁱ Australian Government Response to the Productivity Commission Inquiry into the Economic Regulation of Airports, 11 December 2019, p11, available at <https://treasury.gov.au/publication/p2019-41706>
- ⁱⁱⁱ Australian Competition and Consumer Commission (ACCC), Guideline for quality of service monitoring at airports – June 2014, p2, available at <https://www.accc.gov.au/regulated-infrastructure/airports-aviation/review-of-the-airport-quality-of-service-monitoring-guideline-2013/final-guideline>
- ^{iv} PC, Economic Regulation of Airport Services, Productivity Commission Inquiry Report No.92, 21 June 2019
- ^v As above, p85
- ^{vi} The Australian Government initially imposed price-cap regulations on the airports. Following on from a PC inquiry in 2002, it replaced this with monitoring of prices. See ACCC, Guideline for quality of service monitoring at airports – June 2014, p2
- ^{vii} Airports Regulations 1997, Schedule 2-Records relevant to quality of service matters, Part 2-Table
- ^{viii} Section 155
- ^{ix} Regulation 8.01A
- ^x The *Airports Act 1996* also provides that the ACCC must consult the Australian Government Department of Infrastructure, Transport, Regional Development and Communications and Treasury before determining the criteria. See section 155
- ^{xi} Available via <https://www.accc.gov.au/regulated-infrastructure/airports-aviation/airports-monitoring>
- ^{xii} ‘Peak hour’ is defined in Schedule 2, Part 1 of the regulations.
- ^{xiii} <https://www.accc.gov.au/publications/airport-monitoring-reports/airport-monitoring-report-2020-21>
- ^{xiv} Recommendation 9.5, PC, Economic Regulation of Airport Services, Productivity Commission Inquiry Report No.92, 21 June 2019, pp42-43
- ^{xv} Recommendation 9.5, PC, Economic Regulation of Airport Services, Productivity Commission Inquiry Report No.92, 21 June 2019, pp42-43
- ^{xvi} As above, p 149
- ^{xvii} As above, p 165-6.
- ^{xviii} As above, p 313.
- ^{xix} As above, p 125.
- ^{xx} As above, p131
- ^{xxi} Australian Government Response to the Productivity Commission Inquiry into the Economic Regulation of Airports, 11 December 2019, p11
- ^{xxii} PC, Economic Regulation of Airport Services, Productivity Commission Inquiry Report No.92, 21 June 2019, p86, <https://www.pc.gov.au/inquiries/completed/airports-2019/report>
- ^{xxiii} This is consistent with the definitions of aeronautical and non-aeronautical services that the PC adopted in 2019: PC, Economic Regulation of Airport Services, Productivity Commission Inquiry Report No.92, 21 June 2019, Glossary pp xv and xviii. However, the Airports Regulations 1997 do list car parking service facilities as an aspect of airport services and facilities to be monitored; and Schedule 2 of the regulations provides that airport-operator companies must keep records about certain car-parking matters, such as distance between the nearest public car park and the nearest terminal entrance to that carpark.
- ^{xxiv} See, for example, ACCC, ‘Misuse of market power’, <https://www.accc.gov.au/business/anti-competitive-behaviour/misuse-of-market-power>
- ^{xxv} ACCC, *Airport monitoring report 2020-21, May 2022*, p15
- ^{xxvi} Australian Government Productivity Commission (PC), [Price Regulation of Airport Services \(2002\)](#), Inquiry report, Productivity Commission website, 2002, p 133, accessed 7 April 2022; Productivity Commission, [Economic Regulation of Airport Services \(2012\)](#), Inquiry report, Productivity Commission website, 2012, p 63, accessed 7 April 2022; Productivity Commission, [Economic Regulation of Airport Services \(2019\)](#), Inquiry report, Productivity Commission website, 2019, p 89
- ^{xxvii} ACCC, Guideline for quality of service monitoring at airports – June 2014, pp2-3