

Andrew,

Further to your email of 22 August regarding Aviation Rescue and Fire Fighting (ARFF) "Options Paper", I regret that I will not be able to attend consultation sessions to be held in the week commencing 5 September. We will be represented at the meetings by IATA; however, I think it is useful for us to set our initial views on the paper.

### **Background**

Emirates is a major operator into Australia with the following with 3,650 chargeable movements for ARFF services per year and rising. The operational activities are centred on four main locations in Australia and is split between two main aircraft types:

	Emirates Annual Movements		
	A340	B777	Total
Sydney	730	730	1,460
Melbourne	365	730	1,095
Brisbane	0	730	730
Perth	365	0	365
Total	1,460	2,190	3,650

### **Emirates Price Structure Requirements for Australia**

We strongly believe that the price structure for all of AirServices Australia (ASA) is inequitable and doesn't follow economic rationality. Whilst appreciate that this review is specifically for Aviation Rescue & Fire Fighting Services (ARFF) charges only, the following comments stand for all ASA's main ATC charges.

As you may be aware, the Boeing 777's and Airbus A340's that Emirates fly into Australia have unusually high MTOW's (340 tonnes & 372 tonnes respectively). These high MTOWs are as a result of the unusually long mission lengths these aircraft required to undertake as we carry additional fuel for the long stage length and thus doesn't reflect any additional production capacity. Thus Emirates has a strong dislike of any charging formula which has weight component such as that found in ARFF, as a consequence we do not support any system that has weight based component. Furthermore, we do not support or encourage pricing based on 'passengers carried'.

However, rather than dwelling on the negative points, it is probably best to let you know what we do agree with. We support the following principles for ATC charges in Australia:

- Location specific pricing
- Flat price per flight

As a compromise, we can see some merit in the argument that a system based on the 'Price per flight per Aircraft Category's could be applicable to ARFF; however to obtain our support it will need to have rapidly diminishing marginal increases in charges for each aircraft category (i.e. a strongly regressive price structure).

Andrew, I hope that helps. Let me know if you require any further clarification.

Thanks and regards,

Robin Padgett  
Vice President Procurement (Airline)  
Emirates Group