

Head of Legal – Competition
Anna Pritchard



8 April 2013

Mr David Salisbury
Deputy General Manager
Fuel, Transport and Prices Oversight Branch
Australian Competition and Consumer Commission
GPO Box 520
Melbourne VIC 3001

Email: airport.group@accc.gov.au

Dear Mr Salisbury

Proposed changes to the guideline for quality of service monitoring at airports

Qantas Airways Ltd (**Qantas**) welcomes the opportunity to respond to the Australian Competition and Consumer Commission's (**ACCC**) proposed changes to the guideline for quality of service monitoring at airports (**Draft Guideline**).

Qantas thanks the ACCC for considering our feedback in its Draft Guideline and would like to add some additional clarification and support for a small number of the proposed changes.

We respond to the items in the Draft Guideline in accordance with the numbering used therein.

6.3 Check-in services and facilities

Qantas supports the ACCC's proposal to recognise equipment such as check-in kiosks and bag drops as important components of the check-in process and alternatives to traditional check-in desks.

However, the way in which these technologies are likely to be deployed, and, in particular, whether equipment is more likely to be provided by the airport or the airline, can differ significantly between international and domestic terminals. As a result there may be merit in using different measures for these. For example, at the moment domestic flights are more likely than international flights to utilise alternatives to traditional check-in desks (such as check-in kiosks and/or bag drops) and these are more likely to be provided by the airline so measuring the space available for airlines to install these is relevant. In contrast, international flights are currently more reliant on traditional check-in desks provided by airport operators, although space for airlines to install their own alternative check-in/bag drop facilities and/or airport provided common-user facilities are likely to become increasingly important.

These differences and the fact that this technology is evolving quite quickly may mean that (depending on the speed of change seen at airports) the ACCC needs to review the measures for this aspect earlier than the next scheduled review.

6.5 Outbound baggage system and baggage make-up, handling and reclaiming services, and facilities

Qantas supports the ACCC's proposal to continue to use objective measures for this criteria.

As noted by the ACCC, Qantas has suggested measuring the average in-system time and the longest in-system time of bags from the bag drop to the baggage lateral. This would measure the time from when the bag is placed on the conveyor belt after check-in to the time when the bag is dropped onto the baggage lateral for the ground handler to pick up and place on the

Qantas Airways Limited

ABN 16 009 661 901

10 Bourke Road Mascot New South Wales 2020 Australia
Telephone 61 (2) 9691 5515 Facsimile 61 (2) 9691 5417

aircraft. This is a completely automated process and in the common user terminals at Sydney, Melbourne, Perth, and Brisbane airports it is provided by the airport operators.

Measuring the efficiency of this aspect of baggage systems is an emerging standard which reflects the component of baggage handling which the airports have most control over. Modern baggage systems are increasingly able to track this information.

6.6 Facilities to enable the processing of passengers through customs, immigration and quarantine

Qantas supports the ACCC's recommendation to remove this aspect from its quality of service monitoring. Qantas accepts the ACCC's view that the Australian Customs and Border Protection Service is a better forum for our concerns related to queuing for customs, immigration and quarantine screening.

6.10 Ground handling services and facilities

Qantas supports the ACCC's proposal to expand surveys to include the larger ground handling companies where this is appropriate, as this may provide a greater scope of review of these facilities.

6.13 Aircraft parking facilities and bays

Qantas supports the ACCC's proposal to report on the total area of aircraft parking bays. Trends in this measure over time will complement the airlines' feedback on availability of bays.

6.17 Car parking services facilities

Qantas supports the ACCC's recommendation to include the number of car parking spaces allocated to staff of airport clients.

6.18 Airservices Australia data

Qantas is disappointed in the proposed discontinuation of collection of data from Airservices Australia because, as discussed in our original submission, we believe there is strong value in continuing to report this information.

If Airservices Australia is no longer tracking this exact information, Qantas suggests that the ACCC explore other data available from Airservices Australia that could be used to provide an independent view of airport capacity.

Please contact me on 02 9691 5515 if you have any questions or would like to discuss this submission.

Yours sincerely



Anna Pritchard
Head of Legal - Competition