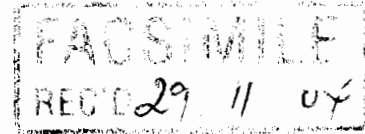




ROYAL FLYING DOCTOR SERVICE
OF AUSTRALIA

Queensland Section
A.C.N. 009 663 478 A.B.N. 80 009 663 478

Brisbane Base



29 November, 2004

Margaret Arblaster
General Manager
Transport and Prices Oversight
Regulatory Affairs Division
Australian Competition and Consumer Commission
GPO Box 520J
Melbourne VIC 3001

FILE No:
DOC: D04/57982
MARS/PRISM: /

By facsimile to 03 96633699

THE ROYAL FLYING DOCTOR SERVICE OF AUSTRALIA (QUEENSLAND SECTION) – RESPONSE TO ACCC PRELIMINARY VIEW – AIRSERVICES AUSTRALIA – DRAFT PRICE NOTIFICATION DOCUMENT – NOVEMBER 2004

Dear Ms. Arblaster,

What follows constitutes the view of the above organisation.

Terminal Navigation Charges

Plainly, we disagree with the ACCC treatment of the Terminal Navigation Charges issue. There is a certain irony in the views of the major RPT carriers; the attempt to apply the ARFF Charges across the largest possible user base to minimise costs is certainly applied in the case of the Terminal Navigation Charges issue. We see no point in pursuing our objections further; clearly minds are made up on the matter and we will now concentrate our efforts to gaining the increased funding required to meet that expectation.

ARFF Charges

In our original submission to AirServices Australia on the matter on 13 July 2004 we said:

Document2



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[Http://www.flyingdoctorqueensland.net](http://www.flyingdoctorqueensland.net)

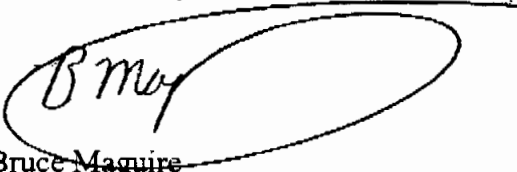


"We are also of the view that any cost recovery of RFFS charges must reside and only reside with those carriers who are compelled by law to have available such services and therefore, any costs must be recovered from ticket holders utilising Regular Public Transport airlines. Very few of the destinations we serve provide RFFS services; we don't require them by law and we have not requested the provision of same."

Our view has not changed one iota. It would be patently unfair to inflict upon us costs which must be borne by RPT airlines; a service provision to **their passengers** mandated by law. Of course we can well understand why the High Capacity RPT Carriers would wish us to pick up some of their costs; totally understandable but nevertheless unworthy.

We also wish to draw your attention to the matter raised with you in a letter today from our sister service in South Australia and that concerns the 2.5 tonne threshold. The application of that weight delineation is anachronistic and we support the view expressed to you by Mr. Tippett on behalf of RFDS Central Operations.

Yours sincerely

A handwritten signature in black ink, appearing to read 'B Maguire', enclosed within a large, hand-drawn oval.

Bruce Maguire
Chief Executive Officer

Document2

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