



27 July 2011

Mr Anthony Wing  
General Manager - Transport and General Prices Oversight  
Australian Competition and Consumer Commission  
GPO Box 520  
Melbourne Vic 3001

Dear Mr Wing,

The Regional Aviation Association of Australia (RAAA) is appreciative the ACCC has offered us the ability to comment on its Preliminary View to the Airservices Australia Draft Price Notification.

The RAAA is a not for profit organisation whose aim is to support its members by working with Government, the regulatory authority, and the community, to promote the maintenance of a safe and viable regional aviation industry. We are the national voice for 28 Ordinary Members (Organisations with an Air Operators Certificate) operating in regional and remote parts of Australia plus 57 Associate/ Affiliate Members (organisations supporting our Ordinary Members) on all aviation issues including those directly and indirectly affecting the viability of ports serviced in regional and remote parts of Australia. RAAA members operate in all States and Territories and include airlines, airports, freight companies, engineering and flight training companies, finance and insurance companies and government entities. Many RAAA members operate successful and growing businesses providing employment and economic sustainability throughout regional areas.

The RAAA supports the views expressed by the ACCC in that Airservices needs to be seen as transparent and accountable in their dealings with all stakeholders on all levels of their operations whether operational or capital in nature.

As stated in our submission, the RAAA emphasises that network based pricing is our preferred option, rather than pricing based on a location specific basis. This ensures greater equity for regional operators and the communities that they service. It cannot be stressed enough that regional air services are an essential part of Australia's transport infrastructure operating on fine margins. We accept AsA's role as a monopoly service provider, however this monopoly government service must be provided at a reasonable and fair cost at every location, and not just fair for locations fortunate enough to have high traffic volumes.

If you require any further information please do not hesitate to contact me on (02) 6162 0346 or email [ceo@raaa.com.au](mailto:ceo@raaa.com.au).

Yours sincerely,

A handwritten signature in black ink that reads 'Paul Tyrrell'. The signature is written in a cursive, flowing style.

Paul Tyrrell  
Chief Executive Officer

*Serving regional aviation, and through it, the people and businesses of regional Australia*

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