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23<sup>rd</sup> November 2004

The Hon John Anderson MP  
Minister for Transport and Regional Services  
GPO Box 367  
Canberra ACT 2601

Dear Sir,

## **Australian Competition & Consumer Commission Preliminary View Air Services Australia Proposed Charges**

The Royal Victorian Aero Club (RVAC) is concerned about several points contained in the abovementioned Preliminary View by the Australian Competition & Consumer Commission (ACCC).

In "Activity Levels"- page 7. The ACCC states: "If activity falls or rises by 10% or more within a 60 day period or is forecast to trend by 5% in any one financial year Air Services Australia (ASA), together with the Industry Steering Committee (ISC) will consider the most appropriate means of addressing the situation.

The concern held by RVAC and other General Aviation (GA) operators at Moorabbin Airport is that if activity goes down Air Services may raise prices even further to compensate without any GA consultation.

RVAC would also like to draw your attention to the following sections of the Air Services Act:

- Section 8 of the Air Services Act, which says one of the primary functions of ASA, is the promotion and fostering of civil aviation in or outside of Australia.
- Section 9 of the Air Services Act requires that ASA regard the safety of air navigation as the most important consideration.

RVAC feels that primary safety should be the first and foremost purpose of ASA and not profit making. Control tower services are a safety consideration not only for pilots but also for the general community and cannot be seen as a profit centre in their own right.

The long-term effects of this pricing review on basic training of pilots in GA, which provide the flow of experienced recruits for the Air Transport Industry, will be devastating.

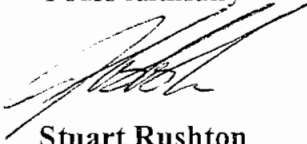
### **Royal Victorian Aero Club.**

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Minister Anderson, RVAC would like you to reconsider the entire matter of ASA pricing review.

Please do not hesitate to contact me should you wish to discuss any of the above.

Yours faithfully



**Stuart Rushton**  
**President**  
**Royal Victorian Aero Club**  
**23<sup>rd</sup> November 2004**

**CC: Margaret Arblaster** ✓  
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