



SB:aac, Our ref: ACCC:GEN

27 August 2004

Ms Isabelle Arnaud
Director Adjudication
Australian Competition and Consumer Commission
PO Box 1199
DICKSON ACT 2602

Via facsimile: 6243 1211

Dear Ms Arnaud

Canberra International Airport submission on the Authorisation Application lodged by the Board of Airline Representatives of Australia (BARA)

Canberra International Airport is currently designated as a Restricted Use and Alternate International Airport, however the recent commencement of international flights to Canberra by Air Pacific and the prospect of further services to New Zealand in the near term may lead to the upgrading of the status of Canberra Airport to "Major International" in the near future.

Canberra International Airport has had various dealings with the Board of Airline Representatives of Australia (BARA) since privatisation, most notably on the issue of the nomination of Canberra Airport as an alternate international airport for Sydney and Melbourne. Canberra Airport has found dealing with BARA unhelpful and unproductive and the Airport has achieved more positive results by negotiating directly with individual airlines.

Canberra Airport believes that BARA negotiating on behalf of airlines will not achieve the public benefits claimed in terms of better management and utilisation of essential airport services. Rather Canberra Airport has a policy only to deal directly with individual operators, which allows the airport to better tailor its facilities to the needs of the individual operator. Canberra Airport's willingness to negotiate broad-ranging financial assistance packages for airlines on a case-by-case basis suggests that a BARA role in negotiating with Canberra Airport (which would not qualify to attract such assistance) would be of detriment to the downstream market for international air services.

Canberra Airport would therefore oppose both the interim and final authorisation application by the Board of Airline Representatives of Australia. Please do not hesitate to contact me for further clarification of issues raised in this letter.

Yours sincerely

Stephen Byron
Managing Director