

16 August 2013

Richard Chadwick
General Manager
Adjudication Branch
Australian Competition and Consumer Commission
GPO Box 3131
Canberra
ACT 2601

By email: anna.giannakos@acc.gov.au

Dear Richard

Virgin Australia & Air New Zealand applications for authorisation A91362 & A91363 – consultation in relation to the Applicants' proposed changes to the draft determination proposed condition

Thank you for your letter of 9 August 2013 and the opportunity to provide comment on the applicants' and interested party proposed change to the condition. Queenstown Airport Corporation Limited (QAC) provides the following feedback:

The Applicant's proposed bundling options or any other bundling of the routes of concern
QAC believes the bundling of the South Island routes is a more logical market grouping. However, QAC would accept a determination that bundles Brisbane with Queenstown/Dunedin/Christchurch/ Wellington routes.

The removal of the Dunedin – Sydney/Melbourne routes from a condition
QAC has no position on this matter.

Imposing no growth factor or imposing an initial growth factor of 0%, subject to review
QAC supports the inclusion of a growth factor and that it should apply from the first year as this recognises the Determination relates to a continuation of an existing alliance.

Duration of the authorisation
QAC has no position on this matter.

Yours sincerely



Scott Paterson
Chief Executive Officer
Queenstown Airport Corporation Limited