



Airlines Serving Tourism



Association of European Airlines

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Rome
Sent by e-mail l.falessi@enac.gov.it 14 June 2011

Dear Mr. Falessi,

Italian ANS National Performance Plan (NPP) 2012-14

Thank you and ENAV for the very open and constructive consultation on the draft Italian NPP held on 26 May.

As the fifth largest cost base in the EUROCONTROL area and currently the seventh highest unit rate, Italian ANS performance is clearly very important to us. We were disappointed that a State that previously had a policy for gradual reduction of its unit rate increased the en route charge three times the average for 2011 and noted that costs had increased some 28% over the 2007-11 period which was six times greater than the traffic handled in the same period.

As mentioned at the November 2010 EUROCONTROL enlarged Committee for Route Charges meeting, we were concerned that this was in preparation to mitigate the impact of the Performance Scheme that will largely determine our costs and charges for the next three years. Against this background we were extremely interested to see your draft Performance Plan proposals.

We were therefore pleased to note the original draft NPP proposals to comply with the minimum EC-wide cost effectiveness target of -3.5% per annum 2009-14. However, following the STATFOR May traffic forecast update we are concerned that Italy is now only proposing a -2.2% average annual efficiency improvement.

While we recognize the impact of the N African situation on traffic using Italian airspace, we believe this is a relatively short-term issue that can be compensated by appropriate State and ANSP actions including those detailed in the attached Annex. We note STATFOR still forecasts positive growth for 2012 with increased recovery in 2013-14. If however Italy believes this could be a longer-term issue then we would expect to see the necessary cost-containment and efficiency measures included in the NPP to compensate and limit the anticipated impact.



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The enclosed Annex provides our concerns in more detail, as already raised during the consultation meeting of 26 May. In particular we cannot support the proposal for a 1% bonus of determined costs of the ANSP for each year when the declared capacity has been achieved, nor do we believe that the necessary detailed justification has been provided for the proposal for a revision of targets for any traffic variation higher than 4.5%.

We urge you to review the NPP and set targets that are consistent with the EC-wide targets as a minimum. We are of course available for any further discussions as necessary on this important topic.

Sincerely and on behalf of the airspace users,