



P.O. Box 686  
Dubai, U.A.E.  
Email: martin.camus@emirates.com

14 February 2011

Mr Andrew Clark  
Chief Financial Officer  
Airservices Australia  
Canberra ACT 2600  
Australia

Dear Andrew,

Thank you for the opportunity to comment on Airservices Draft proposal for the 2011 Long Term Pricing Agreement (LTPA).

Emirates is disappointed with the draft pricing proposal as it seeks to continue the practice of overcharging flights that use the low cost oceanic sectors of the Australian Flight Information Region. Airservices' customers that overfly oceanic sectors should pay a fee that reflects the efficient cost of providing the infrastructure for an enroute oceanic service. Instead, Airservices proposes to continue with a charging structure that imposes a competitive disadvantage on Emirates by unfairly raising the operating cost of flights that are required overfly oceanic airspace.

As you are aware Emirates has engaged with Airservices throughout the development of the 2011 LTPA including a written submission to the 2008 Pricing Options Paper, a written submission to the 2010 Terminal Navigation Pricing Review and through industry and private meetings over the last three years. We are disappointed that this critical issue relating to enroute charging has been ignored.

In addition and as stated in our previous submissions, Maximum Take-Off Weight (MTOW) is not an appropriate basis for setting any Air Navigation charge as weight bears no relevance to the cost of providing a separation service to an individual aircraft. Emirates supports the submission made by IATA calling for at least a significant reduction to the impact of weight within the charging formula.

Yours Faithfully

Martin Camus  
Manager Procurement & Logistics  
Fuel & Air Traffic Control