Dear Sirs

THE TERMINAL NAVIGATION REVIEW DISCUSSION PAPER REFERS

Thank you for the opportunity to respond to your Discussion Paper.

In answer to:-

Q1

(a) Indeed as far as we are concerned there is no great need for a major structural change in Airservices’ pricing. (Option 2).

(b) Circuit training charged at double the price of a full stop landing is reasonable. (Option 3).

(c) For our route structure (Option 6) service based network pricing is attractive as it is transparent and promotes effective forward planning and facilitates accurate expenditure calculations.

Q2

5.1 Addresses this dilemma adequately.

Q3

5.2 All these proposals have merit and are “in the ball park” for our type of operation. Paragraphs 4 and 5 would be optimum.

Q4

Since our operations are very predictable and solidly structured as far as route and destinations are concerned, and, at a pinch, could be classified as GA and “high volume operator”, the annual levied charges are very attractive. To be billed monthly, preferably based on the previous year’s like month TN Charges or, perhaps, total previous year’s TNC costs divided by twelve (12).
Without doubt "same price for same services"; although in our structured operational environment, we would just avoid the "too expensive airports" and stick to the "cheap" ones.

An absolute requirement, the only criticism we can offer is that it takes an extraordinary amount of time and effort to manage and audit these accounts with wads of Credit Notes (one (1) sector at a time) being pushed up and down the line.

The user pays principle is an equitable principle but for Not for Profit operators like ourselves with no chance of recovery of any of our TN (and other) expenses, it is imperative that these costs remain reasonable and contained.

Having said that, the Airservices' pricing structure, in comparison to a few international ports we flew to, is equitable and reasonable but the presentation is ponderous and hard to administer and audit.

I would like to thank Messrs Clark and Logan for a well thought out and presented Discussion Paper.

Yours faithfully

[Signature]

Captain W B Utermark
Deputy Chief Pilot