



25 September 2008

Mr. Øyvind Ek
Samferdselsdepartement
Postboks 8010 Dep
0030 Oslo
NORWAY

SAMFERDSELSDEPARTEMENTET	
AVD./SEK: LS	S. BEH: TKR
25 SEPT 2008	
S. NR: 08 1638 -	AVSKRIF: 763.0

Re: Takstregulativ for Avinors lufthavner for 2009 – Høring (08-638 – TKR)

Dear Mr. Ek,

I am writing to express IATA's strong concern on AVINOR's proposal to increase airport tariffs for 2009.

We are concerned that AVINOR has not provided adequate transparent information to justify the increases. AVINOR presented the proposed tariffs to your Department before these were consulted with IATA. During our meeting with AVINOR on 03 Sept 2009 we were advised that changes could not be made while your Department was reviewing the proposals. This is contrary to the consultation processes laid down by ICAO.

IATA must stress the urgency of the current financial crisis facing the airline industry. Airports (and air navigation service providers) have been asked to provide concrete proposals on how their organisations could contribute to the airlines' effort to achieve greater cost efficiencies. AVINOR's airport tariff proposals do not take account of the current circumstances and we look to your assistance please to ensure adequate action is implemented for the 2009 tariffs.

We urge you to ensure that costs are scrutinised to the fullest extent in search for potential cost efficiencies and cost reduction opportunities. Given the current financial situation, we consider it unacceptable that the charges are simply indexed to increase with inflation and ask you please to take action to resolve this as a bare minimum.

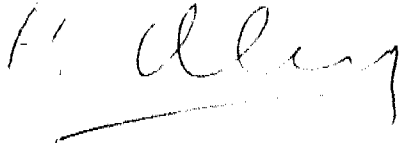
For your information, IATA has only received adequate information with regards to security and PRM charges. Even in this respect, the proposed security charge has been calculated without considering any passenger growth in 2009. An assumption of a 3% passenger growth in 2009 will reduce the security charge from the proposed NOK 60 (or +9.1% increase) to NOK 58.25 (+5.9%).

We also require clarity on costs for regional airports, including government returns on assets for these loss-making activities. IATA urges the State to cover any cross-subsidies to regional airports. Users should only pay for the facilities they use, as per ICAO policies, and our understanding is that the current policy of cross subsidisation and government returns is also responsible for the negative impact on charges for international airports.

The proposed charges cannot be accepted given the lack of adequate information provided. We therefore request your Department not to allow any changes in

charges until AVINOR provides the relevant transparency and organises a new charges consultation that fully complies with ICAO processes and all possible cost reduction opportunities are explored.

Sincerely,

A handwritten signature in black ink, appearing to read 'H. Mistry', with a horizontal line underneath it.

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