

From: Phil Baker
Sent: Monday, 23 June 2008 12:09 PM
To: Salisbury, David
Subject: Draft Quality of Service Monitoring

Hi David,

In an effort to meet your deadlines, may I please submit this brief message in response to your Draft Guidelines?

May I also state at the outset, that monitoring Service Quality is extremely important to this (and many other) airports and we would carry out such procedures whether required to by regulation or otherwise. We feel monitoring by a regulator is unnecessary, but as it is now a "given", we would expect that the ACCC should educate itself in the vagaries of the relevant parts of the aviation industry, to better understand it, rather than rely on a purely theoretical approach.

We at AAL would always be willing to discuss this matter with the Commission, particularly on site, to illustrate our points more thoroughly.

As to your guidelines, we make the following comments and observations:-

1. Scope of Surveys

Whilst we understand that the guidelines refer to airports and not airlines and notwithstanding the fact that it no longer applies in Adelaide, we would have thought that surveying airline operated terminals, where the airport may get to comment, might give rise to an interesting benchmark?

We note in the introduction that you do not intend to survey airline operated terminals.

We are still unsure how AAL will be accurately compared by segment (domestic/international) given that we operate a single multi use building. We already see some interesting responses on this issue through the ACI survey, which we are pleased is acceptable to the ACCC.

2. Defining Adjectives

We wonder how you gauge what is "efficient" or "excessive", words used in your sections 3. and 4.1, given the airports all have different characteristics, are at a different point in their development and age, but more especially where the current airline operators would all define the different criteria from vastly different perspectives. Our problem is to be all things to all customers.

3. Specific Issues

(a) Check-in Counters - as you are aware, AAL makes no separate charge for such items, which clearly does not aid efficient use. Given that some airlines are potentially profligate, for example having counters for First Class check in, where maybe only a handful of persons will be processed over a number of hours, whereas others, particularly LCC's try to control staff costs by only having the minimum number of desk for the minimum time, causing queues - how will the ACCC take such practises into account?

In addition, what 'allowance' will be made for remote/web/kiosk check-in and baggage drop, given the current changes taking place. Are kiosks to be included in the number of check-in

counters available? Should those in the private lounges (QF Club) also be taken into account?

(b) Aerobridges - it must be made clear that the percentage use by airline passengers in the only criteria that is important and not that a bridge is available throughout an airline's turnaround, especially when it is several hours. We are aware that this has been an issue in the past.

(c) Airline Comments - we are delighted with the ACCC's view that such comments must be made by a suitably experienced individual and that lower scores must be justified. We would, however, hope that the airport has a right to respond to any such justification on every occasion and not just "in some instances" as stated in your section 6. Similarly, we would seek such a right on the whole report prior to its publication, whether heeded or otherwise by ACCC.

(d) Miscellaneous - there are a number of criteria which we find odd, apart from the baggage throughput identified by yourselves, which we feel could be omitted and dealt with through exception reporting (outages, availability, etc. as opposed to theoretical or achieved capacity). This would include the issues of freight handling altogether; customs inspection, where the number of desks is not the issue, but the manning level much more relevant; runways, etc, where there might be a view given by AsA/CASA, but again an experienced person with accountability for their viewpoint in the event of a low score. We have similar views on trolleys, FIDS screens and kerbside areas too and repeat our willingness to enter further debate thereon.

In closing, we appreciate the apparent more conciliatory approach being taken by the ACCC and particularly the acknowledgement that airports have limited direct control of airport services (per page 12 in your document). Could we respectfully suggest that the sentence referred to is repeated at the very beginning of the Executive Summary when you come to issue reports in future?

Please feel free to contact me if you require any clarification on the points raised above.

Regards.....Phil

Phil Baker
Managing Director

Adelaide Airport Ltd