



Australian
Competition &
Consumer
Commission

Airport quality of service monitoring guideline

Statement of reasons

October 2008

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Introduction

Quality of service at major airports has been monitored by the Australian Competition and Consumer Commission (ACCC) since 1 July 1997. Quality of service monitoring is undertaken under Part 8 of the *Airports Act 1996*. This airport quality of service monitoring guideline replaces the *Guidelines for quality of service monitoring at airports* released in March 2004.

The monitoring regime has changed significantly since the publication of the previous guideline—namely, amendments to the Airports Act and the Australian Government’s response to the Productivity Commission’s inquiry into price regulation of airport services in 2007—and it became necessary to revise the guideline to reflect these changes.

The consultation process for revising the guideline began with the release of a discussion paper in December 2007 to assist parties in preparing their submissions. Having received a number of submissions from interested parties, the ACCC published a draft guideline which was accompanied by a statement of reasons paper in May 2008. Following this, the ACCC received submissions by interested parties for consideration for the final guideline.

This statement of reasons paper provides explanation of the ACCC decisions made in revising the final guideline. Issues raised in more recent submissions as well as the more significant issues that arose during the consultation process are highlighted. These issues included:

- disclosure of the control over the provision of airport services
- airline head office review of airline surveys
- airport access criteria
- freight facilities criteria
- aircraft refuelling facilities and services criteria
- complying with the passenger survey requirements
- treatment of Domestic Terminal Leases
- check-in criteria
- government inspection criteria
- aerobridges criteria
- flight information display and signs criteria
- baggage criteria

- security clearance criteria
- on-time arrival and departure performance criteria.

With regard to these issues, in determining the inclusion of the *criteria* in the quality of service monitoring program, the suggested *criteria* should:

- fall within the *aspects* listed in Schedule 2 of the Airports Regulations 1997
- relate to the price monitoring and financial reporting program
- relate to facilities and services provided, or which could be influenced, by airport operators
- provide useful information either by itself or with some explanation about quality outcomes, with consideration of compliance costs
- be measurable, verifiable and not susceptible to manipulation.

Importantly, the ACCC understands the airport quality of service *aspects* to be those listed as headings within in Schedule 2 of the Airports Regulations. If the suggested *criterion* does not fall within any of the *aspects* listed in Schedule 2, it will not be considered by the ACCC as part of the monitoring regime.

An objective of quality of service monitoring is to assist the price monitoring and financial reporting program, which covers aeronautical services and facilities as defined in Part 7 of the Airports Regulations. Also of importance, subr. 3 of 7.02A of the Airports Regulations states:

To avoid doubt, aeronautical services and facilities does not include services or facilities:

- (a) relating to the provision of a high-quality service to certain passengers; or
- (b) that are not necessary for the efficient operation of civil aviation.

Notably, subr. 1A of 7.03 of the Airports Regulations provides that Domestic Terminal Leases are not subject to financial reporting:

However, subregulation (1) does not apply in relation to a passenger related service or facility that is located on premises in a passenger terminal if the premises are the subject of a lease (known as a ‘Domestic Terminal Lease’) that was in force when the airport lease was granted to the airport lessee company.

In most instances, the *criteria* are not designed to be interpreted in isolation. For example, some quantitative *criteria* may provide useful context to the understanding of survey results. The ACCC has also sought to improve and streamline the quality of service *criteria* and to comply with the government’s commitment to reduce regulatory burdens on business wherever practicable. This includes eliminating any unnecessary information requirements.

Issue 1 Disclosure of the control over the provision of airport services

The provision of airport services and their delivery can be influenced by different parties for various *aspects*. In the draft guideline, the ACCC acknowledged that relatively few significant airport services are totally under the direct control of an airport operator. Rather, the provision of services is commonly the combined responsibility of a number of entities—including airlines, government agencies, the airport operator and sub-lessees of the airport operator.

To give greater context to the criteria, the ACCC seeks to disclose those parties that contribute to the various aspects by including a table detailing the potential influences each party has on the quality of service. This information will be produced in consultation with stakeholders. An example is shown in table 1.1.

Table 1.1 Example of disclosure of the control over the provision of airport services for check-in

Aspect	Party influence
Check-in	The commercial need for additional counters and the timing of their delivery is jointly identified by the airport and the airline representatives. The cost of providing additional counters and associated building infrastructure is recovered from the airlines via the terminal charge, which is negotiated with the airlines. Airlines are responsible for manning check-in counter desks and for the provision and operation of the check-in IT equipment installed on the counters, the associated software and connections back to their airline host system. Therefore, airport operators and airline users both have an influence on the overall service provided to passengers.

1.1 Submissions to the draft guideline

Brisbane Airport and Perth Airport disagreed with the view that by virtue of their positions as owners of head leases, the airports are in a position, or have a responsibility, to determine or influence service levels. Brisbane Airport stated that often the degree of influence is small and has no contractual basis upon which to undertake enforcement action.

Brisbane Airport also noted that while the example table proposed (similar to the table above) is of some benefit, it would be better to more precisely attribute the measure of service quality among the relevant parties relative to their degree of control. On the other hand, Melbourne Airport submitted that while comparative levels of control held by the airport operators and the airlines over services need to be clearly and transparently articulated, it is too problematic to calculate them.

Perth Airport and Sydney Airport supported the disclosure of the parties responsible for each *aspect*. Virgin Blue also submitted that it supports the proposition of defining the parties for each specific *aspect*, though requested that the ACCC not solely rely on the views of airports in describing the role of the parties involved.

1.2 ACCC's view

The ACCC maintains that an airport operator, as owner of the head lease for an airport, is in a position to at least influence the quality of services provided. Section 152 of the Airports Act indicates that the coverage of the quality of service monitoring program is not restricted by the level of control exercisable over a service by an airline operator. In this regard, s. 152 provides that Part 8 of the Airports Act applies to an airport service or facility if the service or facility is provided (a) by an airport-operator company, or (b) by a person other than an airport-operator company under an agreement with an airport-operator company.

The ACCC considers that highlighting the parties responsible for the various stages of service provision will provide greater context to the relevant *criteria*, and generally improve transparency and accountability. However, attempting to provide information on the degree of control would be problematic to calculate, as highlighted by Melbourne Airport.

The ACCC recognises that the issue of control over the *aspects* of quality of service is important to stakeholders. The ACCC will continue to seek information on the issue from interested parties as part of the airport operator survey, airline survey and the Australian Customs Service (ACS) 'whole-of-government' survey.

Issue 2 Airline head office review of airline surveys

Airline surveys are the airlines' subjective rating of the quality of service the airport operators provide them. The surveys also give the airlines an opportunity to describe their role in influencing the overall quality of service provided to consumers.

Submissions to the discussion paper suggested the need for greater context to the airline survey results to allow for, for example, commercial negotiations and 'extraneous considerations'. In the statement of reasons to the draft guideline, the ACCC stated that airline perception surveys are to be reviewed and submitted by the respective airline's head office. Also, a rating of 'below satisfactory' must be supported with commentary detailing any complaint by the airline and steps it had taken to inform the relevant airport operator of its concerns.

2.1 Submissions to the draft guideline

Adelaide Airport, Perth Airport and Virgin Blue supported airline surveys being reviewed and submitted by the airlines' head offices. Adelaide Airport noted that the airports should be given an opportunity to respond to commentary by airlines on all occasions and not just in some instances. Virgin Blue supported the commentary on the basis that this additional information would remain confidential and not form part of the published airport monitoring report.

Melbourne Airport stated that the inclusion of head office reviews and commentary on ratings below satisfactory will improve the survey, but the ACCC will experience timing issues with receiving responses from overseas airlines' head offices. Further, basic limitations of situational and personal bias may still be prevalent given that the provision of aeronautical facilities and their quality are subject to a complex array of

negotiated capital investment, service level agreements and airline budgetary constraints. Indeed, Melbourne Airport noted that any airline rating or comment must take into account these interrelationships to arrive at a meaningful response to quality.

Perth Airport supported the inclusion of airline views in the overall assessment as well as the ACCC proposal to 'validate' the responses. Further, Perth Airport suggested that airline results should be weighted by passenger volume rather than all being treated equally, as their frequency of interaction with the airport will differ substantially depending on their size and scale of operation. For example, a few negative responses based on limited interaction with small carriers could skew the overall result. Finally, Perth Airport commented that details of the carriers consulted and those that responded should be published.

2.2 ACCC's view

The ACCC's view is that airline surveys should be reviewed and submitted by the airlines' head offices, rather than by operational managers. The ACCC considers this will allow for the results to account for commercial negotiations and reduce the potential for bias. Also, where an airline gives a rating of below satisfactory, the airline must support this with commentary.

In addition, where significant changes in performance are reported, the ACCC may seek to discuss this with the airport operators and other interested parties to understand any underlying causes. These discussions can be an important input into the ACCC's monitoring of airport quality and will be reflected in the published reports. While the ACCC has the discretion to decide what information is reported, information of a confidential nature will not be disclosed.

Perth Airport's suggestion that airline results should be weighted by passenger volume is not a new issue. As noted by the Board of Airline Representatives of Australia in its submission to the Productivity Commission's 2002 inquiry, '[airline] results are not weighted by use, and so the views of an airline that rarely uses the airport are given as much weight as those that use the airport many times on a daily basis.'¹

The ACCC recognises that although the airline survey results are treated equally, airlines that use airports less frequently relative to other airlines may not represent the 'typical airline experience'. Indeed, weighting of the airline survey results by, for example, passenger volume may provide more representative overall results.

It is important, however, to recognise the limitations of using a 'weighted approach'. Weighting of the surveys could provide, for example, a major user airline with the ability to manipulate the results because its responses would be given increased importance. The weighted approach may also provide airports with an incentive to favour the major user airlines.

¹ Board of Airline Representatives of Australia, *Further submission to the Productivity Commission's Inquiry Price Regulation of Airport Services*, June 2001, p. 62.

The ACCC is conscious that interpretation of airline survey results may be complex and require qualification and further investigation in some circumstances. While the ACCC does not propose to replace the current equal weighted methodology with the weighted approach, the weighting of airline surveys may provide additional context to the relevant *criteria*, which the ACCC may use in its analysis of the survey results.

Issue 3 Airport access criteria

Airport access refers to terminal access roads and facilities in landside areas.

Issues relating to airport access roads were raised by Qantas in its submission to the discussion paper. In the statement of reasons to the draft guideline, the ACCC stated that it is appropriate to include airport access roads and traffic management in the monitoring regime. The *criterion* ‘Standard and availability of terminal access roads and facilities (in landside areas)’ was added to the airport access *criteria* in the draft guideline accordingly (table 3.1).

Table 3.1 Criteria for airport access proposed in the draft guideline

Aspect	Passenger survey	Quantitative criteria	Airline survey	ACS whole-of-government survey
Airport access	Kerbside space—congestion Kerbside drop-off and pick-up facilities Taxi facilities—standard Standard and availability of terminal access roads and facilities (in landside areas)	Not applicable	Not applicable	Not applicable

3.1 Submissions to the draft guideline

Qantas and Virgin Blue supported the monitoring of airport access roads and traffic management. In addition, Qantas suggested that it is necessary to monitor the extent of congestion on airport access roads where controlled by airport operators, as well as the availability of sufficient free of charge short-term drop-off and pick-up parking at airports.

Melbourne Airport noted that ‘airport access roads’ and ‘traffic management’ are two distinct measures. While Melbourne Airport had no objections to the airport access *criteria*, it stated that it is important for the ACCC to note that the complex array of inputs that contribute to roads may not be understood by the surveyed passengers. For example, the physical roads access is subject to commercial negotiations with airlines and the constraints of existing airport usage.

Perth Airport recommended that the ACCC develop measures around the availability of landside facilities. This would involve airports submitting information on, for example, the percentage of time roads and other infrastructure are unavailable because of unplanned events—such as road traffic accidents, security alerts and building evacuations. Perth Airport further noted that such unplanned events can impact the road system and are beyond the reasonable ability of the airport to influence.

3.2 ACCC’s view

Airport access is an *aspect* the ACCC is required to monitor under Schedule 2 of the Airports Regulations. As such, there are no changes to the draft guideline proposed *criteria* for airport access.

As discussed above, if passenger survey results for the *criterion* ‘Standard and availability of terminal access roads and facilities (in landside areas)’ changed significantly, for example, the ACCC would seek to discuss the results with the relevant airport operator to understand any possible reasons for this.

Issue 4 Freight facilities criteria

Airside freight-handling and staging areas provided by airport operators are used by the airlines, which have dedicated airfreight carriers for transporting cargo and passenger aircraft that also offer airfreight services. The availability and standard of these areas are therefore an essential component of an airport’s quality of service.

A number of submissions to the discussion paper commented that freight facilities should be included in the monitoring program. Given freight is an *aspect* that the ACCC is required to monitor under Schedule 2 of the Airports Regulations, the ACCC proposed to monitor these services and facilities in the statement of reasons to the draft guideline. The *criteria* ‘Availability of services and facilities associated with airside freight handling and staging areas essential for aircraft loading and unloading’ and ‘Standard of services and facilities associated with airside freight handling and staging areas essential for aircraft loading and unloading’ were consequently added to the draft guideline (table 4.1).

Table 4.1 Criteria for freight facilities proposed in the draft guideline

Aspect	Passenger survey	Quantitative criteria	Airline survey	ACS whole-of-government survey
Freight facilities	Not applicable	Not applicable	Availability of services and facilities associated with airside freight handling and staging areas essential for aircraft loading and unloading Standard of services and facilities associated with airside freight handling and staging areas essential for aircraft loading and unloading	Not applicable

4.1 Submissions to the draft guideline

Virgin Blue submitted that it supports the proposal to include monitoring of freight facilities. On the other hand, Sydney Airport submitted it does not support the inclusion of freight in the quality of service monitoring program. Sydney Airport noted that it monitors and responds to dedicated air freight operators' needs by attending and participating in the monthly freight Air Operators Committee.

In addition, Melbourne Airport commented that airline survey *criteria* for the availability and standard of freight facilities will suffer from situational and personal bias, and will not account for the complex way the commercial agreements are negotiated with airlines.

4.2 ACCC's view

The ACCC maintains that freight is an *aspect* the ACCC is required to monitor under Schedule 2 of the Airports Regulations. As such, there are no changes to the *criteria* for freight facilities that were proposed in the draft guideline.

As discussed above, the ACCC's view is that airline surveys should be reviewed and submitted by the relevant airline's head office, rather than just the operational managers. The ACCC considers this will ensure the results account for commercial negotiations and reduce the potential for bias.

Issue 5 Aircraft refuelling facilities criteria

Aircraft refuelling facilities are generally built and operated by oil companies as a joint user hydrant installation, which includes fixed storage tanks, pipelines and hydrant distribution equipment, on land leased from the airport operator. The airport operators negotiate the terms and conditions for the provision of refuelling services by the oil companies.

A number of submissions to the discussion paper noted that aircraft refuelling services should be included in the monitoring program. The ACCC commented in the statement of reasons following the discussion paper that aircraft refuelling services will not be monitored under the current regime, as aircraft refuelling services are not currently an *aspect* under Schedule 2 of the Airports Regulations.

5.1 Submissions to the draft guideline

Melbourne Airport supported the ACCC's decision not to monitor aircraft refuelling services. Conversely, Qantas and Virgin Blue stated that aircraft refuelling services should be monitored. More specifically, Qantas submitted that the quality and availability of aircraft refuelling services are crucial to the effective operations of airlines and can directly impact the time performance of airlines.

Virgin Blue noted that while aircraft refuelling services are not listed in either Part 1 or Part 2 of Schedule 2 of the Airports Regulations, these services are defined as aeronautical services and facilities and listed in Item—Table 1—Aircraft-related services and facilities under Part 7.02A of the Airports Regulations. Further, Virgin Blue commented that the ACCC should reconsider its decision to exclude aircraft refuelling services from the quality of service regime and should take the necessary steps under s. 155 of the Airports Act to make these amendments necessary so as to add 'aircraft refuelling services' to the quality of service regime.

5.2 ACCC's view

The ACCC maintains that aircraft refuelling services are not an *aspect* of airport services and facilities it is required to monitor under Schedule 2 of the Airports Regulations and, therefore, will not be monitored under the current regime. The Department of Infrastructure, Transport, Regional Development and Local Government is responsible for the Airports Regulations and, more specifically, the services included in the quality of service monitoring regime.

Issue 6 Complying with the passenger survey requirements

Passenger surveys used by most airports ask respondents to rate their level of satisfaction with facilities on a scale of one to five. Passenger perception surveys are arranged by each airport and differ somewhat in their coverage and detail. Importantly, these surveys must provide information consistent with that specified in the regulations and the ACCC guideline.

The discussion paper sought comment on whether its existing policy of accepting data from authoritative international benchmarking exercises—such as the Airport Service Quality (ASQ) survey conducted by the Airports Council International (ACI)—should be continued or amended.

In the draft guideline, it is stated that the ACCC will accept the ACI ASQ survey and that questions in the ACI survey, while not identical, are sufficient to address the areas set out in the Airports Regulations.

6.1 Submissions to the draft guideline

Melbourne Airport, Sydney Airport and Virgin Blue supported the continued acceptance of the ACI ASQ survey. Sydney Airport noted that it would back the adoption of the ASQ survey by all airports, which would then provide a standard for quality of service monitoring in place of the current ACCC report. Virgin Blue stated that it supports the proposal to continue to accept international benchmarking exercises, such as the ACI's ASQ survey, in lieu of passenger satisfaction surveys undertaken by individual airport operators.

Brisbane Airport submitted that the use of any particular survey or service provider should not be mandated but rather be discretionary. For example, Brisbane Airport stated that although it accepts that the ACI ASQ survey is well regarded, it believes mandating any specific program may interfere with any commercial negotiations between an airport operator and service provider—giving that service provider a 'mandated monopoly position'.

6.2 ACCC's view

Airport operators are required to provide passenger perception surveys that meet the information requirements specified in the Airports Regulations and the guideline, including recent changes to the Airports Act. Upon further review, the ACCC considers that the ACI ASQ survey lacks the level of coverage needed to adequately satisfy the information requirements set in the Airports Regulations and the guideline. For example, the ACI ASQ survey does not satisfy the information requirements for the *criteria* 'Baggage reclaim—waiting time' and 'Baggage reclaim—information display'.

Airport operators that continue to use the ACI ASQ survey will need to provide supplementary passenger survey information to fully comply with the ACCC's quality of service monitoring program requirements.

Issue 7 Treatment of Domestic Terminal Leases

Domestic Terminal Leases (DTLs) are leases that cover domestic terminals that were in force when the individual airport leases were granted to the airport operators. DTLs are operated by the airlines.

The issue is whether the DTLs should be included for airport quality of service monitoring, given that a significant proportion of passengers at some airports arrive and depart through airline leased and operated domestic terminals only. Notably, terminals formerly leased to Ansett that are now under the control of airport operators—and no

longer DTLs—are included within the scope of the monitoring program. The draft guideline did not specifically address DTLs.

7.1 Submissions to the draft guideline

Brisbane Airport submitted that it is regrettable the ACCC has chosen not to include airline performance and the quality of service provided within domestic terminals owned and/or operated by the airlines in the monitoring program. Brisbane Airport noted that the majority of the customer service experienced by passengers is provided by airlines. Further, domestic terminals owned and/or operated by the airlines can represent a significant proportion of the total passenger mix and, therefore, be a significant determinant in the quality of service experience.

Perth Airport submitted that the monitoring report should contain details of the ‘airport customer experience’ of all passengers and not just those processed through terminals operated by airport operators. Perth Airport noted that the majority of its passengers over the previous 12 months arrived and departed through the Qantas leased and operated domestic terminal. Consequently, survey results will not reflect the experiences of most people using the airport.

Perth Airport stated that the monitoring report should provide an explanation of the reasons behind the decision to exclude DTLs from the scope of the review. Further, if the objective of the ACCC service monitoring regime is to discourage monopolistic behaviour by airport operators, the same argument could be levelled at operators of leased terminal facilities.

Adelaide Airport noted that while the guideline refers to airports and not airlines, surveying airline operated terminals (where the airport may get to comment) could be an interesting benchmark.

7.2 ACCC’s view

DTLs are not within the scope of the price monitoring program, which covers aeronautical services and facilities as defined in Part 7 of the Airports Regulations and, therefore, will not be monitored under the current regime.

In addition, the ACCC monitors facilities and services provided, or could be influenced, by the airport operator. Importantly, the airlines appear to operate the domestic terminals under DTLs independently of the airport operator and, hence, have broad discretion over the quality of the service offered.

Issue 8 Check-in criteria

The discussion paper sought comment on what would be the most appropriate measures of check-in quality of service and the impact of new options for check-in. Submissions to the discussion paper highlighted the fact that monitoring of check-in needs to allow for changes in processes—such as the introduction of ‘bag drop’ facilities and services—to remain relevant.

Check-in *criteria* listed in the draft guideline are shown in table 8.1.

Table 8.1 Criteria for check-in proposed in the draft guideline

Aspect	Passenger survey	Quantitative criteria	Airline survey	ACS whole-of-government survey
Check-in	Check-in—waiting time (international and domestic separately)	Percentage of hours with more than 80 per cent of check-in desks in use (international and domestic separately)	Check-in—availability Check-in—standard (international and domestic separately)	Not applicable

8.1 Submissions to the draft guideline

Adelaide Airport questioned what ‘allowance’ will be made for remote/web/kiosk check-in and baggage drop, given the current changes taking place in the industry. In addition, Adelaide Airport asked whether kiosks and check-in counters in private lounges would be included in the number of check-in counters available.

Adelaide Airport also noted the potential effect of varying practices by the airlines in the provision of check-in services on the *criteria*. For example, some airlines have separate counters for first class check-in—for which only a handful of passengers will be processed over a number of hours. On the other hand, low-cost carriers in particular may try to control staff costs by having only the minimum number of counters, which might result in greater queuing.

Perth Airport submitted that if the hours of use of each check-in counter *criterion* is retained, the ACCC should clearly state that hours of use are to be taken over the ‘operational day’ rather than a 24-hour period because some airports are subject to night curfews. Moreover, information on the hours of use of each check-in counter is not readily available to airport operators.

8.2 ACCC’s view

Passengers with baggage have the option of either checking-in through the traditional check-in process, or using the Internet or a ‘check-in kiosk’ in conjunction with a bag-drop facility. For the purpose of monitoring, the ACCC views these passenger options for check-in as substitutes.

While check-in facilities are provided by the airports, airlines have the discretion to provide a range of check-in service options and, importantly, are in a position to respond to consumer demands for service levels. The check-in *criteria* focus on the availability and standard of the check-in facilities provided for airlines, rather than the range of options provided to passengers, as these factors can be influenced by the airport operator.

Information regarding the total number of hours *any* check-in desks are open is used when calculating the denominator for the *criterion* ‘Percentage of hours with more than 80 per cent of check-in desks in use’. Notably, in past monitoring reports there has been some inconsistency in the way this information has been reported to the ACCC. To

ensure comparability of this *criterion* across the monitored airports, the ACCC requires the relevant information to be taken over the ‘operational day’—that is, the time in which at least one check-in desk is open during the course of a day, rather than in a 24-hour period. Airport curfew details will be noted in the report to provide additional context to the check-in *criteria*.

Issue 9 Government inspection criteria

In previous airport quality of service monitoring reports, the ACS has completed an annual survey for the ACCC, giving its rating of the services and facilities provided by airport operators to allow for government inspection services. This information is used for the government inspection *criteria* shown in table 9.1.

The ACS made a submission to the discussion paper proposing that it alternatively coordinate a ‘whole-of-government’ response to the quality of service monitoring survey. Specifically, to give a more balanced and measured approach, the ACS proposed to engage the Australian Quarantine and Inspection Service and the Department of Immigration and Citizenship in the survey process as well as giving its own ratings and views.

In the draft guideline, the ACCC supported the ACS proposal that it coordinate a whole-of-government response to replace the ACS-only survey response.

Table 9.1 Criteria for government inspection proposed in the draft guideline

Aspect	Passenger survey	Quantitative criteria	Airline survey	ACS whole-of-government survey
Government inspection	Immigration area (inbound)—waiting time Baggage inspection (inbound)—waiting time Government inspection (outbound)—waiting time (international only)	Number of arriving passengers per inbound Immigration desk (during peak hour) Number of arriving passengers per baggage inspection desk (during peak hour) Number of departing passengers per outbound Immigration desk (during peak hour) (international only)	Not applicable	Inbound Immigration facilities—availability Inbound Immigration facilities—standard Inbound baggage inspection facilities—availability Inbound baggage inspection facilities—standard Outbound Immigration facilities—availability Outbound Immigration facilities—standard (international only)

9.1 Submissions to the draft guideline

Virgin Blue supported the introduction of an ACS whole-of-government survey, noting that such a measure is important from an interpretative perspective with respect to the passenger survey. Perth Airport supported the ACS survey being replaced with a whole-of-government response. Perth Airport also suggested an additional suite of measures be developed around average processing time by border control agencies, which would include both dwell time in the queue and the physical intervention time by the agency concerned.

Melbourne Airport submitted that while the proposed approach by the ACS will broaden the response from government agencies, the risk of situational and personal bias is still present and the results would be unreliable. Melbourne Airport also noted that the ACS has little or no involvement on airfield or domestic terminals, while other government agencies have an active involvement. Melbourne Airport would prefer the National Advisory Facilitation Committee (NatFAL) and the Passenger Facilitation Taskforce (PFT) over the ACS given, for example, the NatFAL and PFT have a more comprehensive and consistent view of quality service provision over time. The Department of Infrastructure, Transport, Regional Development and Local Government

was also suggested as an alternative to the ACS to coordinate government agencies' responses as the role would complement its existing responsibilities.

Sydney Airport also raised concerns relating to the subjective and biased nature of feedback provided to the ACCC by the ACS and airline surveys. It was noted, however, that if the ACS survey data continue to be collected, all information presented to the ACCC by government inspection agencies should be reviewed and submitted by the agencies' head offices. In addition, agencies should provide commentary on the survey results when ratings fall below those of the previous year. Finally, Sydney Airport suggested that the ACCC should require future government inspection surveys to include data on issues such as the quality and timeliness of service delivery provided by those government agencies.

9.2 ACCC's view

The ACS-only surveys provided to the ACCC as part of previous airport monitoring reports have assisted with the analysis of results from the passenger survey. Notably, ACS survey results collected for the last two monitoring reports do not suggest that the ACS responses are biased to the detriment of the airports. For example, in 2005-06 and 2006-07, the average rating for the currently monitored airports was between satisfactory and good.

The ACCC supports the ACS proposal that it coordinate a whole-of-government response to a quality of service monitoring survey at each of the monitored airports, as this would provide a wider perspective of government inspection services.

In providing a greater survey sample, the whole-of-government approach will also reduce the potential for bias in responses. Further, the government inspection survey responses are to be reviewed and submitted by the relevant agencies' head offices. This allows for commercial (or other) negotiations between government agencies and airport operators to be taken into account (including any investment undertaken by government agencies for which it has complete control). Also, a rating of below satisfactory must be supported with commentary describing the government agencies' concerns to provide greater transparency and accountability of survey results.

Issue 10 Aerobridges criteria

Aerobridges are moveable bridge connectors that extend from an airport terminal gate to an aircraft, thereby enabling passengers to board and disembark without having to walk on the tarmac.

The discussion paper sought comment on whether quantitative data on aerobridge use by domestic passengers was available from airport operators. In response, a number of airport operators stated that this information was not available to them. The *criteria* listed in the draft guideline are shown in table 10.1.

Table 10.1 Criteria for aerobridges proposed in the draft guideline

Aspect	Passenger survey	Quantitative criteria	Airline survey	ACS whole-of-government survey
Aerobridges	Not applicable	Percentage of passengers arriving using an aerobridge Percentage of passengers departing using an aerobridge (international only)	Aerobridges—availability Aerobridges—standard (international and domestic separately)	Not applicable

10.1 Submissions to the draft guideline

Brisbane Airport suggested measuring utilisation of aerobridges by only those airlines that require an aerobridge.

Perth Airport recommended that the *criteria* for aerobridge service levels be removed from the monitoring regime because they are no longer a relevant indicator of service standards. For example, low-cost carriers in particular prefer not to utilise aerobridges as a means of ‘enplaning’ and ‘deplaning’ passengers. More specifically, aerobridges are perceived to slow down ‘aircraft turnaround’, with carriers preferring to board via both the front and rear doors. Perth Airport also noted that some airports charge for aerobridge use as a means of differentiating service standard. Finally, some aircraft are unable to use aerobridges even on bays where they are provided.

In addition, Perth Airport suggested *criteria* that measure the ‘number of services that were coached to remote non-terminal contact aircraft parking bays as a percentage of all passenger numbers’. For example, Perth Airport noted that an increase in the number of passengers unable to access their aircraft over time may suggest the need for greater capacity.

Adelaide Airport noted that ‘it must be made clear that the percentage use by airline passengers is the only *criteria* that is important and not that a bridge is available throughout an airline’s turnaround, especially when it is several hours’.

10.2 ACCC’s view

The airline survey questions for the *criteria* ‘Aerobridges availability’ and ‘Aerobridges standard’ will be applicable only when aerobridge facilities are sought by the airlines.

The ACCC’s view is that it will not require *criteria* related to the number of services coached to remote non-terminal contact aircraft parking bays as a percentage of all passengers. Such measures appears to be outside the scope of ‘aerobridge services’ and would also broaden the information requirements for airport operators.

As discussed above, where an airline gives a rating of below satisfactory, the airline must support this with commentary. The ACCC considers this will make accountability for service and facility outcomes clearer.

Issue 11 Flight information display and signs criteria

Flight information display screens provide real-time updates of flight arrivals and departures information to passengers.

The discussion paper sought comment on whether:

- to combine the passenger survey questions into a single passenger survey question concerning flight information display and signs
- information was available to facilitate corresponding peak period passenger numbers
- the *criterion* ‘Flight information display screens per passenger (during peak hour)’ should be removed given the variability of the size of the screens.

In the draft guideline, ‘Average distance between display screens’ was added to the flight information display screens *criteria* (table 11.1).

Table 11.1 Criteria for flight information display and signs proposed in the draft guideline

Aspect	Passenger survey	Quantitative criteria	Airline survey	ACS whole-of-government survey
Flight information display and signs	Flight information display screens Signage and wayfinding (international and domestic separately)	Number of passengers per flight information display screen (during peak hour) Number of passengers per information point (during peak hour) (international and domestic separately) Average distance between flight information display screens (international only)	Not applicable	Not applicable

11.1 Submissions to the draft guideline

Brisbane Airport submitted that the quantitative measure of flight information display screens per passenger during the peak hour is poor because of the variability in the size and nature of the screens. Similarly, Sydney Airport submitted that the current flight information display and signs *criteria* rely on crude quantitative measures, which are unhelpful because a reduction in number does not necessarily equate to a reduction in service. For example, while the existing approach reported the number of flight information display screens at Sydney Airport decreased in 2007, it did not report that this was due to an upgrade to larger and clearer LCD screens.

Perth Airport noted that the *criterion* ‘Average distance between flight information display screens’ is a poor measure of quality given the number of screens required is essentially a product of the design of the terminal facility—that is, more screens will be required where wayfinding is intrinsically unclear and sightlines to devices are poor. Perth Airport also recommended that the ACCC provide a definition of flight information display screens as they are found in several areas of an airport.

11.2 ACCC’s view

The *criterion* ‘Average distance between display screens’ will not be included as it does not provide context to the flight information display and signs *criteria*. While the other quantitative *criteria*—more specifically, the ‘Number of passengers per flight information display screen (during peak hour)’ and ‘Number of passengers per information point (during peak hour)’—do not necessarily account for the quality of flight information display screens, they provide useful context to the subjective *criteria* (table 11.2).

Flight information display screens relate to screens that principally provide flight arrivals and departures information. These screens may provide additional information regarding, for example, baggage or check-in information. Flight information display screens in areas relating to the provision of a high-quality service to certain passengers—such as private lounges—are excluded.

Where significant changes in performance are reported, the ACCC may seek to discuss this with the airport operators to understand any underlying causes.

Table 11.2 Final criteria for flight information display and signs

Aspect	Passenger survey	Quantitative criteria	Airline survey	ACS whole-of-government survey
Flight information display and signs	Flight information display screens Signage and wayfinding (international and domestic separately)	Number of passengers per flight information display screen (during peak hour) Number of passengers per information point (during peak hour) (international and domestic separately)	Not applicable	Not applicable

Issue 12 Baggage criteria

Baggage departure and reclaim services do not include baggage trolleys, which is a separate *aspect*.

The statement of reasons to the draft guideline sought stakeholders' views on what would be the most appropriate *criteria* relating to baggage. The ACCC suggested three potential quantitative *criteria* to be added to the draft guideline, namely:

- IATA measure of the time taken for the first bag on and the last bag off
- Number of reclaim units available per arriving aircraft (during peak hour)
- Average belt presentation length per average aircraft size (table 12.1).

Table 12.1 Criteria for baggage proposed in the draft guideline

Aspect	Passenger survey	Quantitative criteria	Airline survey	ACS whole-of-government survey
Baggage	Baggage reclaim—waiting time Baggage reclaim—information display Baggage reclaim—circulation space (international and domestic separately)	Average throughput of outbound baggage system, bags per hour IATA measure of the time taken for the first bag on and the last bag off Number of reclaim units available per arriving aircraft (during peak hour) Average belt presentation length per average aircraft size (international and domestic separately)	Baggage facilities—availability Baggage facilities—standard (international and domestic separately)	Not applicable

12.1 Submissions to the draft guideline

Melbourne Airport submitted that it opposes the introduction of the *criterion* ‘IATA measure of the time taken for the first bag on and the last bag off’ because it is not accurate in some peak periods. For this *criterion*, Perth Airport noted that delivery times to the reclaim belts are not under the control or influence of the airport, and this is a matter between the aircraft ground-handling agent contracted to off-load and deliver arriving baggage as well as the airline concerned. On the other hand, Virgin Blue supported the adoption of the IATA measure as an internationally recognised measure.

Melbourne Airport also opposed the introduction of the *criteria* ‘Number of reclaim units available per arriving aircraft (during peak hour)’ and ‘Average belt presentation length per average aircraft size’ because they measure capacity rather than quality. In addition, Melbourne Airport was against using the *criterion* ‘Average throughput of the outbound baggage system, bags per hour’, stating that it measured total system capacity rather than peak capacity. Notably, Melbourne Airport suggested the *criterion* ‘time taken from check-in desk to reach the lateral’ as a measure of quality, which is largely within the control of the airport.

Virgin Blue noted that performance *criteria* that monitor the operational reliability of baggage systems should be considered. Virgin Blue suggested, for example, ‘total time and number of times that a baggage system was inoperable and/or operating at a sub-

optimal rate (in both number and percentage terms) compared to the system's total operating time' to be a suitable measure.

Similarly, Qantas submitted that in addition to the current baggage *criteria*, both the reliability of baggage systems (including the duration and frequency of baggage system failures), and the reliability of checked bag screening equipment (including the duration and frequency of system failures), could be monitored.

Perth Airport submitted that 'baggage' should be defined in terms of the 'departure baggage system' and the 'baggage reclaim system'. For the departure baggage system, Perth Airport suggested airports should be required to report on the availability of the system to airline customers, either reporting the number of unplanned outages of more than 'x' minutes during the operational day, or the system availability as a percentage of the operational hours.

In addition, Perth Airport noted that airports are typically designed to accommodate a specific level of traffic in the knowledge that this will be exceeded a certain percentage of the time. In the aviation industry the '95th percentile busy hour rate' is generally used, where only 5 per cent of traffic would be expected to be above this rate. Perth Airport suggested that a good indication of service level is the number of times this level is breached. For example, if 10 per cent of a given airport's traffic was actually accommodated above the '95th percentile design flow rate', this would be a potential indicator of the need to expand the current facilities.

Perth Airport recommended more broadly that any *criteria* using 'peak hour' should be dropped in favour of *criteria* that measure the 95th percentile busy hour rate. This includes replacing, for example, the *criterion* 'Number of reclaim units available per arriving aircraft (during peak hour)' with measures detailing reclaim availability and crowding in terms of the 95th percentile hour rate.

12.2 ACCC's view

The *criterion* 'IATA measure of the time taken for the first bag on and the last bag off' has not been included (table 12.2). It is unclear as to what this *criterion* actually measures and, therefore, the ACCC cannot verify its usefulness. Also, the *criterion* 'Number of reclaim units available per arriving aircraft (during peak hour)' has not been included. This *criterion* would not necessarily be comparable across airports because of significant variability in the capacity of the reclaim units and the size of arriving aircraft. Finally, the *criterion* 'Average belt presentation length per average aircraft size' has not been included as the data required are not currently collected from the airports.

The ACCC's view is that changing the *criterion* 'Average throughput of outbound baggage system, bags per hour' to 'Average throughput of outbound baggage system (during peak hour)' provides a more relevant indicator. In addition, the *criterion* 'Average throughput of inbound baggage (during peak hour)' has been included. Based on advice provided to the ACCC suggesting that some airport operators may not have sufficient information to establish a 95th percentile hour rate, the use of 'peak hour' measures will be used as a relevant indicator of capacity. Further, 95th percentile hour rate data have not previously been required from the airports.

Additionally, the *criteria* ‘Total time that a baggage reclaim system was interrupted’ and ‘Total time that a baggage departure system was interrupted’ have been included. These *criteria* will provide some insight into the reliability of the baggage system and provide additional context to the subjective baggage *criteria*. Airports have previously provided the data to measure performance against these *criteria*.

Table 12.2 Final criteria for baggage

Aspect	Passenger survey	Quantitative criteria	Airline survey	ACS whole-of-government survey
Baggage	Baggage reclaim—waiting time Baggage reclaim—information display Baggage reclaim—circulation space (international and domestic separately)	Average throughput of outbound baggage system (during peak hour) Average throughput of inbound baggage system (during peak hour) Total time that a baggage reclaim system was interrupted Total time that a baggage departure system was interrupted (international and domestic separately)	Baggage facilities—availability Baggage facilities—standard (international and domestic separately)	Not applicable

Issue 13 Security clearance criteria

The security clearance *criteria* listed in the draft guideline are shown in table 13.1.

Table 13.1 Criteria for security clearance proposed in the draft guideline

Aspect	Passenger survey	Quantitative criteria	Airline survey	ACS whole-of-government survey
Security clearance	Security clearance—quality of search process (international and domestic separately)	Number of departing passengers per security clearance system (during peak hour) (international and domestic separately)	Not applicable	Not applicable

13.1 Submissions to the draft guideline

Brisbane Airport questioned the ability of the general public to properly assess the quality of the security search process. For example, Brisbane Airport noted that passengers may rate ‘thoroughness’ based on different experiences.

Perth Airport recommended a measure around the number of times or volume of traffic processed by security beyond the declared ‘95th percentile busy hour rate’ (similarly discussed in section 12.1). In addition, Perth Airport noted that there is no common definition or airport understanding of the elements that comprise a ‘security clearance system’.

13.2 ACCC’s view

There are no changes to the draft guideline proposed *criteria* for security clearance.

While passenger assessments of security systems are inherently subjective and may be influenced by factors outside the control of airport operators, the passenger survey is an important source of information for perceptions of airport security clearance and quality of search process. As noted by the ACCC in section 12.2, some airport operators may not have sufficient information to establish a 95th percentile busy hour rate and the data have not previously been required from the airports.

For the purposes of monitoring, the ACCC considers a ‘security clearance system’ to involve a set of operational equipment that is required for a person to be processed according to government-mandated security requirements, prior to that person entering the ‘airside’ area in an airport terminal. For example, *one* security clearance system may comprise an X-ray machine for baggage, a metal detector and a hand-wand that are being *actively* operated. Typically, there are a number of security clearance systems at a given location within an airport. This meaning of security clearance system appears to be consistent with information reported to the ACCC by the majority of the monitored airports.

Issue 14 On-time arrival and departure performance criteria

The on-time arrival and departure performance *criteria* are based on statistics collected by the Bureau of Infrastructure, Transport and Regional Economics (BITRE), which are publicly available.

The BITRE measures of on-time arrival and departure were added to the quality of service *criteria* to the draft guideline. It was noted that while on-time arrival and departure performance is an area in which airport operators do not have complete control, it does provide additional information to the availability and standard of airside services and facilities.

The *criteria* for on-time arrival and departure performance listed in the draft guideline are shown in table 14.1.

Table 14.1 Criteria for on-time arrival and departure performance proposed in the draft guideline

Aspect	Passenger survey	Quantitative criteria	Airline survey	ACS whole-of-government survey
On-time arrival and departure performance	Not applicable	On-time arrival (percentage) On-time departure (percentage)	Not applicable	Not applicable

14.1 Submissions to the draft guideline

Melbourne Airport submitted that it is opposed to the inclusion of on-time arrival and departure *criteria*. More specifically, Melbourne Airport noted that the inclusion of the *criteria* is inappropriate and misleading because such measures are largely dependent on airline infrastructure, airline manning levels, other airports, passenger behaviour, weather and air traffic control.

Similarly, Perth Airport submitted that it is not feasibly objective to link on-time performance to airport system deficiencies because the main influences of on-time arrival are the time the aircraft departed from its last port of call, prevailing winds and air traffic control delays. Further, the taxi time from the runway to the parking bay is a largely insignificant proportion of the total journey time for passengers.

14.2 ACCC's view

The *criteria* 'On-time arrival (percentage)' and 'On-time departure (percentage)' will not be included in the quality of service monitoring program. These *criteria* by themselves do not adequately indicate the level or changes over time of airport operators' performance relating to flight on-time arrival and departure.