



25 June 2008

Mr David Salisbury
A/g General Manager
Transport Branch
Australian Competition and Consumer Commission
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By Email

Dear Mr Salisbury

Airport Monitoring Information Requirements

Thank you for your letter of 29 May 2008 inviting Qantas to comment on the draft *Guidelines for Quality of Service Monitoring at Airports – May 2008 (Draft Guidelines)*.

The Draft Guidelines provide a reasonable balance between the important need to monitor airport service levels and avoid imposing an unnecessary administrative burden on airport operators. There are, however, a number of additional matters that Qantas believes should be included to strengthen or clarify the Draft Guidelines.

Refuelling Facilities

We note that the Commission's *Airport Quality of Service Monitoring Guidelines Statement of Reasons - May 2008 (Statement of Reasons)* concludes that the Commission does not propose to monitor aircraft refuelling services. The lack of appropriate refuelling infrastructure and services can directly impact the on time performance of airlines.

Qantas believes that the quality and availability of aircraft refuelling services is crucial to the effective operations of airlines and therefore should be monitored.

Baggage Services

The Statement of Reasons seeks stakeholder input with respect to the most appropriate measure or set of measures for the Commission to use in its monitoring of baggage services.

Qantas would support the adoption of measures that include the following reportable criteria (in addition to those already set out in Attachment A to the Draft Guidelines):

- reliability of baggage systems, including the duration and frequency of baggage system failures; and
- reliability of checked bag screening equipment, including the duration and frequency of system failures.

Airport Access

Qantas endorses the measures suggested in the Draft Guidelines relating to airport access. In addition to these measures it is also necessary to monitor the extent of congestion on airport access roads, where they are controlled by airport operators, and the availability of sufficient free of charge short term drop-off and pick-up parking at airports.

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Specific Measures for Reporting Criteria

The Draft Guidelines set out the criteria for airport monitoring but do not set out the specific measures airports will be expected to take in order to meet those criteria.

Qantas notes that the Commission has stated in the Draft Guidelines that it will not set standards of service. However, as airports are monopoly facilities, airlines such as Qantas have had difficulty in reaching commercial agreement on minimum service standards. An indication from the Commission of minimum acceptable standards would help to address this imbalance of power.

Should you have any queries in relation to this matter, please contact Jill Henderson in the first instance on [REDACTED]

Yours sincerely,



Jana Kadlec
General Manager Airport Developments & Concessions
Qantas Airways Ltd