

I represent the Manchester Airports Group (MAG), formal address for which is:

Olympic House
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Manchester
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I note that previous submissions have been made by MAG, courtesy of Robert Nicholls, which contain background details of the organisation.

Q1.

We consider that the bespoke fee proposal is fairer than the previous blanket generic fee structure. In particular, we recognise that it better reflects the actual performance requirements that can be derived and to some extent desired through efficient use of the limited VHF frequency resource.

Q2.

No view.

Q3.

We would express a preference for a bespoke structure to be applied as a limited DOC approach cannot be ruled out for future uses.

Q4.

No view.

Q5.

Without making the fee structure and charging system too complex, we consider that the proposals are suitably pragmatic and acknowledge the limitations that are implied.

Q6.

We believe that the proposed phasing-in timetable offers sufficient time for licence holders to consider options and make adjustments, provided that the CAA are able to apply the required level of resource to meet the demand. In this respect we would propose that an appeal against the increases effective in April 2014 be permitted where evidence can be supplied to support a case for delays beyond the control of the licence holder.

Q7.

This seems appropriate and will clarify the licence purpose more clearly than at present.

Kind regards,
Simon

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