

Pricing submission for 2019-22 pricing consultation.

Peter Armstrong

It is my suggestion that for any flight conducted where an aircraft is under 5500lbs and is not commercial ie non-revenue earning, that the Airways consider offering an annual flat fee of a \$100 per annum charge for these aircraft ie general GA, Amateur built, Microlight and any aircraft that fits within this category (eg Catalina).

Doing so would encourage these users

- To use controlled airspace

- Take up the facilities of flight following.

- Facilitate a faster user introduction of ADSB within their personal aircraft

The benefits to Airways is a greatly simplified billing system – one bill per aircraft per annum for those that fit within this category. Some users will not opt for this approach, they will continue to be charged as is however it is my view that the user acceptance of such an idea will rapidly gain the majority of all user support.

The back-end systems support required by Airways would be greatly reduced and the cost savings of such an approach can be used to offset any loss of revenue.

At present a lot of user shy away from using Controlled Airspace simply to avoid charges, from a safety perspective this not a desirable outcome. I am aware of one death because of the pilot's reluctance to use controlled airspace because of fear and charges.

Airways' Pricing Consultation

Customer Feedback Template



This feedback template features the questions set out in Airways' proposed pricing for the 2019 – 2022 period consultation document, as well as one final question relating to any further comments you may want to make.

The feedback questions are there to help you develop your submission and to help Airways analyse your feedback. You are welcome to comment on other topics should you wish to.

The template is in a Microsoft Word format for you to download from Airways' website. Please save it and type directly into the spaces provided.

Please start by reading Airways' proposed pricing for the 2019 – 2022 period consultation document before filling out this template. Email your completed template to submissions@airways.co.nz by 15 March 2019. Alternatively, you can post your completed template to: Airways pricing consultation, Airways New Zealand, PO Box 294, Wellington 6140.

All customer submissions will be carefully considered before prices are finalised and released publically on 29 May 2019.

Important note for submitters

All submissions will be made available to the public from Airways' website. However, you can request the removal of content (clearly identified in your submission) as commercially-sensitive or confidential and Airways will remove the information prior to publication. Submitters should highlight any comments or contents that are commercially-sensitive or confidential.

Your details

Name	Peter Armstrong
Organisation (if applicable)	
Email	
Phone	
Address	

Consultation feedback questions



Question 1: Do you support Airways' roadmap to implement digital tower services at Invercargill and Auckland during the 2019-2022 pricing period?

Yes , as long as it does not impact on current charges where non–revenue producing flights are involved ie GA etc

Question 2: Do you support Airways' involvement in the AIAL project to implement an FCR at Auckland?

Yes , as long as it does not impact on current charges where non–revenue producing flights are involved ie GA etc

Question 3: Do you support Airways' UAV detection and management initiatives to enhance safety in and around controlled airspace?

Yes , as long as it does not impact on current charges where non–revenue producing flights are involved ie GA etc

Question 4: Do you support the projects in figure 11? Are there other service enhancements that Airways should be considering?

Yes , as long as it does not impact on current charges where non–revenue producing flights are involved ie GA etc

Question 5: Do you support Airways' business transformation to improve the resilience and flexibility of future services?

Yes however the only reason that Airways exists is because there is an ICAO mandate to provide safety services for airline operations. The GA community can fly any airfield safely without the need of Airways using existing uncontrolled airfield procedures (Ardmore is the busiest airfield in NZ and has is in uncontrolled airspace). Any cost structure increase should be borne by the commercial airlines using a per trip fee.

Question 6: Do you support Airways' capital programme to maintain safe and reliable services? Note full details of the capital programme are provided in Appendix 2.2.

Yes however the only reason that Airways exists is because there is an ICAO mandate to provide safety services for airline operations. The GA community can fly any airfield safely without the need of Airways using existing uncontrolled airfield procedures (Ardmore is the busiest airfield in NZ and has is in uncontrolled airspace). Any cost structure increase should be borne by the commercial airlines using a per trip fee.

Question 7: To continue to maintain safe and efficient services do you accept Airways' increase to base operating costs?

No. The only reason that Airways exists is because there is an ICAO mandate to provide safety services for airline operations. The GA community can fly any airfield safely without the need of Airways using existing uncontrolled airfield procedures (Ardmore is the busiest airfield in NZ and has is in uncontrolled airspace). Any cost structure increase should be borne by the commercial airlines using a per trip fee.

Question 8: Recognising that the inflation inputs will be updated with current information at the time of setting final prices, do you agree with the sources of Airways' inflationary inputs?

No. The only reason that Airways exists is because there is an ICAO mandate to provide safety services for airline operations. The GA community can fly any airfield safely without the need of Airways using existing uncontrolled airfield procedures (Ardmore is the busiest airfield in NZ and has is in uncontrolled airspace). Any cost structure increase should be borne by the commercial airlines using a per trip fee.

Question 9: Do you agree with the inputs into Airways' capital charge calculation?

No. The only reason that Airways exists is because there is an ICAO mandate to provide safety services for airline operations. The GA community can fly any airfield safely without the need of Airways using existing uncontrolled airfield procedures (Ardmore is the busiest airfield in NZ and has is in uncontrolled airspace). Any cost structure increase should be borne by the commercial airlines using a per trip fee.

Question 10: Is there any other information Airways should consider to forecast future volume growth?

Make ADSB compulsory for all airspace in NZ with appropriate rebate for installation for all non-revenue producing aircraft. The cost savings and trade-off benefits far outweigh the costs.

Question 11: Do you support proposed changes to charges for Queenstown night operations, and extended or unscheduled out-of-hours services?

Yes , as long as it does not impact on current charges where non-revenue producing flights are involved ie GA etc

Question 12: Do you support the Scorecard metrics in figure 27?

No comment

Question 13: Are there any other measures Airways should consider including in the Scorecard?

When a GA or non-revenue earning flight get denied access to Controlled Airspace, as is happening more and more frequently these days and is equipped with ADSB, then a compensatory rate should be returned to that operator for the cost of equipping their aircraft with ADSB. Your shortage of staff and purported busyness of air traffic is not sufficient excuse when the tools of ADSB and traffic management/flow/safety for the control of traffic and its resulting efficiencies are the very reasons why there is the requirement for ADSB in controlled airspace



**Proposed prices
for General Aviation**

Question 14: Do you agree with the inflationary inputs used to uplift GA prices?

No. The only reason that Airways exists is because there is an ICAO mandate to provide safety services for airline operations. The GA community can fly any airfield safely without the need of Airways using existing uncontrolled airfield procedures (Ardmore is the busiest airfield in NZ and has is in uncontrolled airspace). Any cost structure increase should be borne by the commercial airlines using a per trip fee.

Question 15: Do you agree with the proposed changes to Milford prices?

Yes , as long as it does not impact on current charges where non-revenue producing flights are involved ie GA etc



Other feedback

Are there any other comments you would like to make?

See my individual submission on having an annual flat fee rate for all non-revenue earning flights flying in controlled airspace.