

Dear Mr. van Sterkenburg,

Many thanks for the possibility to comment on the Lelystad proposal.

Please find our brief comments on behalf of the Lufthansa Group.

Feedback:

Lelystad is currently not slot coordinated as it is not open for scheduled traffic. Once it opens the demand is likely above capacity and slot coordination needs to be considered according to the EU Slot regulation. Slot coordination would be handled by an independent body according to transparent, non-discriminatory and efficient global standards. The non-application of slot coordination for Lelystad would most likely produce different utilization. Also the global new entrant rules would not apply.

The proposed traffic distribution would exclude certain destinations from AMS which is a heavy restriction in airlines commercial freedoms. It would also regulate the access to the scarce airport capacity for the AMS area instead of leaving it to an independent slot coordination according to global new entrant and incumbent rules. Slot coordination has been invented especially for such cases where airport capacity is below demand and where access to airports is an issue.

We would prefer that a new airport like Lelystad would be opened under regular market conditions. Only if the opening of Lelystad under market conditions including slot coordination fails evidently, a traffic distribution should be considered as ultima ratio. It is unknown whether Lelystad needs incentives policy in order to sufficiently attract traffic.

Positions:

Lelystad should be opened under regular market conditions.
Lelystad should have reasonable charges and not be subsidized by another airport.
Lelystad should be slot coordinated per EU Slot regulation.
Access to Lelystad should be regulated as per EU Slot regulation.

Could we please have more information about the foreseen market approach mentioned in the documents?

The content of our submission can be published.

Best regards,
Yanki Pürsün