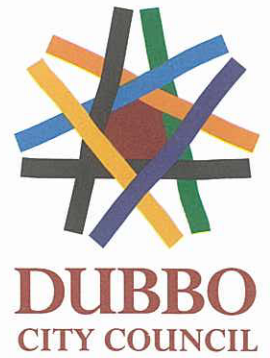


27 February 2009

Department of Infrastructure,
Transport, Regional Development and Local Government
GPO Box 594
CANBERRA ACT 2601



BY FACSIMILE 6274 6749

Dear Sir

SUBMISSION BY DUBBO CITY COUNCIL (DUBBO CITY AIRPORT) ON THE DEVELOPMENT OF A NATIONAL AVIATION POLICY – SUBMISSION ON GREEN PAPER

Dubbo City Council owns and operates the Dubbo City Airport and would like to make the following submission on the Development of a National Aviation Policy Green Paper on behalf of the Airport and the greater Dubbo Airport Catchment. Council's submission will reference those areas covered in the Green Paper that are relevant to Dubbo Airport and effect the Dubbo and wider community that the airport services.

Trigger Points for Screening:

Council agrees, in the absence of a better scheme, that the logical method of determining a trigger point for the screening of passengers is the Maximum Take Off Weight (MTOW) of the aircraft and not whether the aircraft is a jet or turbo prop. However, when developing a policy, it is necessary to take the following into account. If you take the example of the Dash 8 - 400 and Dash 8 - 300 operated by Qantaslink, the imposition of MTOW at say greater than 28,000 kilograms will capture the Dash 8 - 400 and above. To avoid passenger screening, the airline may decide to fly the smaller aircraft into a port. This could detrimentally affect the number of seats available to a port and thus affect the economy of the local community.

Perhaps the better way of determining a trigger point is to determine the risk of individual ports. The Wheeler report into Aviation Security used Dubbo as a case study and determined that Dubbo was a 'low risk' port.

Pricing Options of screening:

The cost of security screening can be quite prohibitive and under the current regulations can affect whether a jet service can be offered to a port, particularly if the port cannot afford to take the risk. This can have a two fold effect:

1. The airport bears all the risk of having a jet service fly into its port with the capital sunk costs not being able to be recovered; ie the airline can pull out of a port at any time leaving the airport with the debt of any infrastructure requirements.

All communications to:

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2. Whilst the cost of providing security screening for passengers and luggage can be recovered from the airlines, the cost per passenger is much higher at a regional port as opposed to a capital city port, however the capital city port can spread the costs of the same service over more passengers thus an unfair competitive advantage is apparent.

The cost of screening passengers and luggage at all airports should be the same and the policy needs to have an outcome of providing a like service at a like price. The cost of screening in regional ports needs to have some form of subsidy. Given the national significance of airport security, it seems logical that funding is made available from the Federal Government to assist regional ports in keeping down the cost to passengers and thus securing the viability of air services. Airports are a large contributor to the economic wellbeing of any community.

Screening Models:

Council would support the concept of a Regional Screening Authority if introduced. This would allow economies of scale in the provision of security screening services across regional ports and allow the costs of screening to be kept down. The Regional Screening Authority would be able to recruit suitable staff and bulk purchase equipment to be rolled out to regional ports.

The ability to attract suitable staff is an ongoing issue in regional areas and a focused approach by a regional authority or screening provider may be able retain staff and have the necessary expertise for providing this service. This would allow airports the ability to attract new services without the need to provide additional resources in compliance and setting up security screening services which is not their core business. The compliance costs in implementing security screening to regional airports is another sunk cost that the port will not be able to recover so why not leave it to a Regional Screening Authority whose expertise will save time and money for individual regional ports.

Change to Regulation

The regulation regarding screening those passengers 30 minutes either side of an aircraft that requires its passengers to be screened should be scrapped. Not only is it unfair to passengers, it is unfair to the airlines whose aircraft would normally not require screening. It is operationally inefficient to the airport and imposes unfair charges to the airlines who would not normally require screening if their flights fell outside this window. A delay by an aircraft that requires screening can ensure that other aircraft normally operating outside this window falling into the window and requiring screening.

Summary

Dubbo City Council fully supports the Federal Government in its efforts to producing a National Aviation Policy and would like to thank the Government for the opportunity to be able to contribute the view of Dubbo City Airport.



Mark Riley
General Manager