

Steenokkerzeel, 30th July 2007

Denis Huet
Eurocontrol
Performance Review Unit
Rue de la Fusée, 96
B-1130 Brussels

RE: CANSO Comments on Economic Rules for Information Disclosure v0.1

Dear Mr. Huet,

We would like to thank you for having given the opportunity to CANSO to comment the Economic Rules for Information Disclosure version 0.1 of March 2007, referred to in Annex III of the draft Implementing rule for Performance Review.

CANSO would like to outline the following aspects.

Reference	Comment
General Comment (1)	The PRU's capacity is already restricted in terms of staff – is the PRU convinced that all of the additional information requested in the revised Rules for Economic Information Disclosure (REID) can be analysed without requiring additional resources? Causal, rather than observational, analysis is likely to become increasingly important over time and the additional quantity of information to be collected and analysed might conflict with this objective.
General comment (2)	The collection of certain data will require important additional work for the ANSPs which will need some time to investigate in different departments before filling in the boxes. CANSO considers that the costs for this work have not been sufficiently evaluated.
General Comment (3)	ANSPs are pleased that the PRU has acknowledged the problems that some ANSPs might have in being able to provide information in the format requested – the provision of comment boxes to explain further the information provided is most important. ANSPs ask Eurocontrol to foresee a longer time (couple of months) to fill out the templates in the first round.
General Comment (4)	Whilst ANSPs are happy to provide information for benchmarking purposes, there is considerable concern over the additional workload (and hence cost) that is likely

	to arise from the additional items of information requested in the revised REID – in all cases the information requested should be confined to what is absolutely necessary
P22 Template 2, 2.5	For EU states under SES regulations, designation is essential, not an option. This seems as the only response possible; what other legal instruments are envisaged? CANSO suggests adding “only for non EU (or assimilated) states”.
P23 Template 2, 2.8	Need for a comment box here to enable additional information to be recorded (since some information contained in the quoted documents will not be made available due to their sensitive / confidential nature).
P24 Template 2, 2.10	Some additional background and clarification of the information sought would be appreciated here.
P24 Template 2, 2.12	Should this refer to charges, rather than prices?
P26 Template 2, 2.16	CANSO suggests adding in the title of this template that it only concerns “non EU (or assimilated) states”.
P28 Template 3, 3.1	Q1 and Q2 do not accommodate a yes/no answer
P30 Template 4	ANSPs are pleased to provide the information required as long as this information will not lead to change the charging regulation.
P31 Template 4, 4.3	CANSO suggests materiality threshold with respect to leasing charges/year: €1m
P31 Template 4, 4.5	The Austro Control comment requires further investigation and clarification
P32 Template 5, 5.1	The information requirement here is ok but there is a concern that this could lead to a request for more detailed information at some point in the future.
P33 Template 5, 5.2	Need for a comment box to accommodate the situation where an ATCO continues to work on other duties but not as an ATCO in Ops
P34 Template 5, 5.4	The text before the comment box should refer to questions 23-30, instead of 1-8
P34 Template 5, 5.5	Concern was expressed over the potential amount of information that could be required unless a materiality threshold is imposed
P36 Template 6, 6.3	Is this information really necessary here, since it is available in the LCIP/service and investment plan? CANSO suggests taking the template out.
P 36 Template 6 , 6.4 & 6.5	ANSPs suggests consolidating templates 6.4 & 6.5 since they consider that by filling out template 6.5, the information required in template 6.4 is already provided.
P43 Table A.1, A.2, A.3	CANSO recommends to shift line A11 upwards between line A9 and A10 so that they become part of total revenues

	which should actually be the case since this is revenue earned in a previous year (n-2) to be carried over the current year. This means that A10 becomes "Total invoiced revenues" and that table A2 is eliminated.
P55 Table A.1, A7 Financial income	Consistency of terminology is recommended.
P 56 Table A.3, A15 Staff costs	Correct alignment of capitalised staff costs (A15 page 43) and staff numbers (C15 page 45) is most important
P57 Table A.3, A18 Cost of capital	The mention "before financing and corporate tax" is deleted in the text page 57 and should be taken out in the table A.3, A.18 page 43 as well.
P57-58 Table A.3, A21-A23	Terminology - " cost " instead of "payment" should be the exact terminology (Note that the title of Table A3 is "Costs by ANS segment").
P57 Table A.3, A21 Payment for outsources MET	CANSO suggests " Cost for external MET provision".
P60 Table A.5, A40 Net current assets required	Net current assets could also be defined as current assets less non-interest bearing debt.
P61 Table A6 Breakdown of total MET costs	Need for more detail on the definitions of "direct" and "core" Met costs
P62 Table B.1, B1 NBV of fixed assets in operation	This may involve rather arbitrary allocation between categories
P63 Table B.1, B3 Systems & Equipment in operation	The allocation between <i>Systems & Equipment</i> on one hand and <i>intangible assets</i> on the other hand could not be produced in some cases since some assets are made of both systems and intangibles assets. This applies for NBV of fixed assets and CAPEX.
P67 Table C.1, C1-C2	CANSO considers that this needs clearer definition and that ANSPs might not be able to provide the split requested.
P68 Table C.2, C10-C11	This might only be possible through making a lot of assumptions. CANSO suggests simplifying the table and keep the split as set up in the information disclosure text v2.5 (one column for technical support /one column for ATM/CNS)
P68 Table C.2, C11	R & D is suggested as an alternative title; there is a need for better criteria on how to provide the split requested
P69 Table C.4, C20-C21	Is this really necessary? At the very least, a better definition would be appreciated
P70-71 Table D1, D9-D12	This information would be very difficult to provide in particular D.10 that CANSO suggests taking out.

P71 Table D2 Geographical scope of services provided by the ANSP	Is this table really needed, given that much of it is already in the Fact Sheet? To avoid duplication, this table should be taken away, and the PRU could extract data from the Fact Sheet.
P73 Table D6 Annual working hours per "ATCOs in OPS"	Is such a detailed breakdown really necessary? CANSO is of the opinion that only the working hours are necessary for the performance analysis.
P75 Tables D8 & D9	CANSO is not convinced of the value of this additional detailed information and is concerned about the cost implications of providing the data –we would prefer to delete these tables
P77 Table E3, E15/E16/E17	It is necessary to clarify the items of the Table E3. There is confusion between "sector" and "working position" and this has to be rectified. Also the definition of the term "available" should be clarified.
P80 Table E6 Info on major ATM systems at the ACC	Same comment as for Tables D8 & D9 on P75
P80 Table E7 Area control sector capacities at maxi configuration	The interest of sector capacity data for ANSP cost effectiveness benchmarking should be justified. Moreover, in table E7 item E43 and following items cannot be dealt with. CANSO suggests deleting these items. If this data presents some interest, we could keep only the maximum capacity controlled by the ACC at the maximum configuration.
Table F8 (P51) Planned numbers of surveillance assets and nav aids	Same comment as for Tables D8 & D9 on P75

Thanking you in advance for taking these comments into account.

Yours sincerely,



Marie Desseaux
Director European Affairs

CANSO European Office
canso@skynet.be

Tel +32 2 201 09 11
Fax+32 2 203 89 16

Tervuursesteenweg 303
1820 Steenokkerzeel

CANSO Head Office
info@canso.org

Transpolis Schiphol Airport
Tel +31 23 568 53 80

Polaris Avenue 85e
2132 JH Hoofddorp, The Netherlands