



Katie Bhreatnach  
GM of Customer and Regulatory Partnerships  
Airways New Zealand  
Level 2, 6 Leonard Isitt Drive  
Auckland Airport  
Auckland 2022  
New Zealand

Date 16/06/2021

### **IATA Response to Airways' Proposed Revised Service Framework**

Dear Katie,

IATA represents some 293 airlines in 120 countries carrying over 83% of the world's air traffic. Our mission is to represent, lead, and serve the airline industry.

IATA welcomes the opportunity to provide feedback on the proposed changes to the Airways Service Framework.

Firstly, I would like to note that IATA endorses the views detailed in the response provided to Airways by BARNZ.

Like BARNZ, we believe that it is not immediately clear that there are service framework issues at play that are materially affecting system efficiency in New Zealand. We also contend that it is difficult to provide a view on whether the current structure is impeding efficiency without understanding what benefits the model Airways proposes will deliver, and that there is insufficient information provided in the consultation document to be able to answer this question.

Our overarching message at the moment to all service providers is that with aviation in such an extremely precarious position, all parts of the industry value chain need to be operating as efficiently as possible and continually mindful that every single cent of expenditure counts and must deliver a benefit. It is therefore critical that more data is forthcoming from Airways to allow a thorough evaluation of the impact on airlines of any changes to your service framework

We believe that it is becoming increasingly apparent that current ANSP funding models and organizational structures may not be fit for purpose for some time. Beyond consideration of your service framework, our perspective is that there does not appear to be any viable way Airways can support industry recovery without additional government funding until such time that aircraft movements and associated ANSP revenues grow back to sustainable levels. Any actions that result in driving up ANS charges before airlines can re-establish scheduled flights will create an endless loop that results in slower recovery of flights and therefore less ANS revenue.

We agree with BARNZ that it would be very beneficial if Airways facilitated an industry workshop to outline the benefits that the proposed changes would deliver to customers over and above the current service framework. IATA would welcome the opportunity to participate virtually in such a forum.



Thank you again for the opportunity to provide feedback on your proposal and we look forward to an ongoing exchange of information and views on this issue.

Yours faithfully,

A handwritten signature in black ink that reads "B. A. Cowles". The signature is written in a cursive style.

Blair Cowles  
Regional Director, Safety and Flight Operations  
Asia Pacific  
[cowlesb@iata.org](mailto:cowlesb@iata.org)