

To whom it may concern

In the 'Proposed Pricing Framework' document section 7.4 it states that;

Vicinity landings are charged a fixed fee for each landing made. For the purpose of the Pricing Framework, a vicinity landing means any landing within an airport control zone, which is not at the attended airport. The fee is charged for the separation and/or flight information service received while operating in the airport control zone and making a vicinity landing. The vicinity landing fee is set below the minimum airport service price.

I think a fixed national fee does not accurately reflect the cost to deliver this service or take account of differences in the value customers derive from this Airways' service. These two points are reflected in section 2.4 (c) and (d) of the Consultation Paper.

The number of vicinity landings is recorded by Airways and Pre-COVID Queenstown might encounter approximately 20,000 of these movements each year. This figure is by far the highest of any attended aerodrome in NZL. In almost all of these vicinity landings within the Queenstown Control Zone the aircraft has occupied the IFR instrument approach or departure path. Not only is it possible for the aircraft to occupy the IFR flight path while passing through, but in Queenstown the vicinity operation can land/depart from within the instrument approach/departure path and this can be both below and above the IFR aircraft. As such and in Class C airspace, the vicinity movement requires a lot more attention and calculation of separation. It is a movement that requires the same, if not more, attention and responsibility as if it were a movement on the aerodrome itself.

The same level of responsibility/separation etc does not apply at Class D aerodromes as broadly speaking just traffic information can be passed.

The large number of vicinity operations within the Queenstown Control Zone also, in part, generates the need for an additional ATC position to ensure that those heightened responsibilities/separations are being applied correctly at the same time as other ATC functions. This additional position is called the Queenstown Coordinator.

I think the definition of 'vicinity landings' as above is appropriate, however the charge for a Class C (Main Trunk & QN) aerodrome should be much higher than a Class D aerodrome. This would then better reflect the cost that is incurred, in particular at Queenstown, and would better reflect the value that Airways' customers have derived from our service at a Class C location.

At Queenstown specifically, the value of the vicinity service is equivalent to the service as if they were operating at the attended aerodrome itself, so the vicinity charge should be modified to the same level to better reflect that complexity and heightened separation/service requirement.