



**Airlines for America®**

*We Connect the World*

February 24, 2022

The Director of Services  
Aircraft Noise Competent Authority  
Fingal County Council  
County Hall, Main St.  
Swords, Co. Dublin, K67X8Y2

**Re: North Runway - F20A/0668**

Dear Sir/Madam,

Airlines for America<sup>1</sup> (A4A) A4A is the principal trade and service organization of the U.S. scheduled airline industry. American Airlines, Delta Air Lines, United Airlines and our associate member, Air Canada, provide combination services from North America to Dublin Airport. FedEx and UPS provide extensive all-cargo and express services to Dublin Airport. We appreciate the opportunity to comment on the draft decision of Ireland's noise authority in relation to Dublin Airport's new runway and two of the conditions attached to its planning.

A4A is concerned that the two conditions, 3(d) and 5 are severe and will have a negative effect on transatlantic routes and services provided by our members into Dublin. The connectivity between North America and Ireland via Dublin Airport is extremely important to the economies of the U.S., Canada and Ireland and should be enabled and protected. Condition 3(d) prohibiting the use of the North Runway between the hours of 2300 and 0700, and Condition 5, restricting total aircraft movements to 65 at the entire airport between the hours of 2300 and 0700, do just the opposite.

Dublin's role as a hub airport linking North America and Europe was growing rapidly pre-Covid, with our member airlines utilizing slots at the airport throughout the operating hours of the airport. While some flights have returned to Dublin post-pandemic, there are many which have not. In order for airlines to consider additional route development in the future, it is important that the right conditions are in place in terms of runway capacity and maximum operational flexibility.

Flights between the U.S., Canada and Dublin are among the shortest transatlantic flights, especially when departing from the east coast of North America. If the airport has minimal arrival capacity until after 0700L, that means late-night departures from North America due to short block time and time zone changes. Optimal flight timing is to depart from points in North America earlier and arrive earlier into Dublin which enables customers (and freight/packages) to connect to a beyond flight or for passengers to start their day at the destination.

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<sup>1</sup> A4A's members are Alaska Air Group, Inc.; American Airlines Group, Inc.; Atlas Air Worldwide Holdings, Inc.; Delta Air Lines, Inc.; FedEx Corp.; Hawaiian Airlines; JetBlue Airways Corp.; Southwest Airlines Co.; United Airlines Holdings, Inc.; and United Parcel Service Co. Air Canada is an associate member.

February 22, 2022

The North Runway has the potential to be the catalyst for transatlantic growth. We are supportive of replacing the two planning conditions, 3(d) and 5, with more balanced alternative conditions proposed by the Dublin Airport Authority, which will meet the capacity and flexibility needs of airline customers at Dublin Airport as well as comply with ICAO's balanced approach.

We support the work being undertaken by the Aircraft Noise Competent Authority to review these conditions in relation to passenger carriers, but have continuing concerns on the effects of the planning conditions specific to our cargo carriers. We look forward to receiving an outcome from ANCA's process that will ensure the maximum effective usage of the airport to benefit all of our economies.

Sincerely,

A handwritten signature in dark ink, appearing to read 'Keith Glatz', with a long horizontal flourish extending to the right.

Keith Glatz  
Vice President-International Affairs