

Private and Confidential

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Luton, 25 January 2023

easyJet preliminary questions on AdR's proposal

Dear Mr Soleri,

Thank you for the opportunity to respond to the consultation on the proposed charges for Fiumicino and Ciampino airports for 2023-24 and AdR's proposal regarding reallocation between the EU and Non EU charges in response to ART resolution n. 232/2022.

easyJet continues to have serious concerns regarding AdR proposal's lack of transparency and weak legal and regulatory accounting justification to increase charges for passengers with an UK destination. The proposal is too vague to conclude that it is compliant with non-discrimination and transparency obligations. For these reasons, we anxiously await to receive more details on AdR's proposal. Based on this information, easyJet will provide a more detailed submission.

In particular, AdR has not been able to demonstrate the application of the cost correlation principle according to Art. 80 of the D.L. n. 1/2012. We also note that AdR's methodology to compute the new non-EU passenger charge is not based on ART Models and has not been consulted with users. AdR also failed to explain how the current proposal is compliant with ART's authorisation of the 24th of March 2022 to freeze 2022 airport charges at 2021 levels.

We request AdR to allow at least 15 days for AdR's users to present a final position after the receipt of the clarifications requested below and after a supplementary meeting is held 15 days after the consultation scheduled for the 31st of January 2023:

1. Are passengers' charges for non-EU destinations being lowered to €23.96 per passenger in 2023? Are passengers' charges for UK destinations being increased to €23.96 per passenger in 2023? How is this decision consistent with ART's approval to freeze charges for 2023?
2. If passengers' charges for UK destinations are increased, could you explain how AdR plans to avoid collecting extra revenue without compensating for the increase with a proportional decrease in EU charges?
3. When was the last time the EU and non-EU areas for cost allocations were reviewed? Did ART approve the cost allocation methodologies?
4. How many square meters are in the EU and non-EU areas and when were they last audited?

5. Are the assets and costs for 2023 – and 2022 – the same as the proposed proxy year of 2019?
6. How have the “user pay” and “non-discrimination” principles mentioned by ADR been applied to allocate costs of Schengen and non-Schengen areas to EU and non-EU traffic designations?
7. What is the “dwell time” of UK passengers before and after Brexit?
8. What is the “dwell time” of non-Schengen European, Schengen, and non-European destinations? How and when was the “dwell time” calculated? How is the time spent in the commercial area considered?
9. What are the gates used by non-Schengen European, non-Schengen EU, and international destinations? What is the average walking time?
10. What is the average waiting time before passport control? What is the average waiting time at security gates in T1 and T3? What is the average walking time from security gates to EU and non-EU gates? Could you provide evidence?
11. Could you explain why T1 baggage drop-off and T3 baggage drop-off use a different percentage in the allocation than the BHS?
12. Could you explain why T3 has a different percentage of T3 baggage drop-off?
13. What is the average number of bags per passenger for Schengen, Non-Schengen EU, UK, and international passengers?
14. Could you provide evidence that 2% of UK passengers use baggage transit facilities?
15. Could you provide evidence on how the revenue contribution has been calculated?
16. Could you explain the methodology used to calculate the differential of non-EU passenger charges, referencing the ART models, and if it was approved by ART or ENAC? Why the principle of “cost-correlation” should be accompanied by a revenues’ metric?
17. What is the cost coverage for EU and non-EU passenger charges in 2019, 2022 and 2023? What is the cost coverage for UK passengers in 2019, 2022 and 2023?
18. Could you explain the methodology used to allocate costs to non-EU passenger charges, referencing the ART models, and if it was approved by ART or ENAC?
19. Could you provide the difference between determined costs and incurred costs in 2019 and 2022?

We welcome the opportunity to discuss easyJet’s questions and position. We look forward to being consulted on AdR proposal.

Sincerely,



Francesco Rado

Airport Regulation and Economics Specialist

easyJet plc