



**Performance Review Body**  
designated by  
the European Commission



# PRB Annual monitoring report 2014

Registry of comments received during fact validation

30.09.2015

## COMMENT RESPONSE SHEET

### RP1 PRB Annual Monitoring report 2014

#### RP1 PRB Annual Monitoring - Comment Registry

*Title of the Document commented: RP1 PRB Annual Monitoring report 2014 Version: Working Draft 2.0; Date of issue: 03/09/2015*

# Comment	Reference (Chapter / Section / Para / bullet / etc. in the document)	Type of comment (typo, factual mistake, general, etc.)	Comment	Response
<b>Baltic FAB: comments by</b>				
<b>LITHUANIA: Comments by Rūta Vaiguskaitė</b>				
			No comments on the report.	Factual data confirmed.
<b>POLAND: Comments by Paweł Wójcik</b>				
1	Section: Monitoring of en-route and terminal COST-EFFICIENCY for 2014; table: 2. En-route DUR monitoring (2014); part: POLAND – Data from RP1 national performance plan; row: En-route costs (determined costs 2012-2014) – (in nominal PLN); page 265 in PRB Annual Monitoring Report 2014 Poland, page 265	typo	In the column “2010A” should be 471 159 429 (not 471 159 428).	This is noted. The figure 2010A comes from the Polish Performance Plan (addendum on revised targets, Table 3, the 2010A figure is 471 159 428) and it is the same as in previous years' PRB Monitoring reports. Since the difference is marginal (i.e. 1PLN) and without impact on the unit cost, we prefer not to modify the figure.

# Comment	Reference (Chapter / Section / Para / bullet / etc. in the document)	Type of comment  (typo, factual mistake, general, etc.)	Comment	Response
2	Section: Monitoring of en-route and terminal COST-EFFICIENCY for 2014; table: 7. General conclusions on the monitoring of the 2014 en-route DUR; part: At State/Charging Area level; headline: Actual 2014 costs vs. NPP; page 267 in PRB Annual Monitoring Report 2014 Poland, page 267	general	The second sentence in the second paragraph under the headline Actual 2014 costs vs. NPP should be supplemented by information that percentage changes (shown in brackets) refer to values expressed in 2009 prices.	The text has been amended to reflect Poland's comment.
3	Section: Monitoring of en-route and terminal COST-EFFICIENCY for 2014; table: 7. General conclusions on the monitoring of the 2014 en-route DUR; part: At ATSP level; headline: Conclusion; page 267 in PRB Annual Monitoring Report 2014 Poland, page 267	general	The first sentence in the first paragraph under the headline Conclusion should be supplemented with information that percentage change, which describes PANSA's costs, refers to values expressed in 2009 prices.	It is already indicated at the end of the sentence that the % change is in real terms. No change required.

# Comment	Reference (Chapter / Section / Para / bullet / etc. in the document)	Type of comment (typo, factual mistake, general, etc.)	Comment	Response															
4	Section: Monitoring of en-route and terminal COST-EFFICIENCY for 2014; table: 9. En-route DUR 2014 vs. actual unit cost for users; page 268 in PRB Annual Monitoring Report 2014 Poland, page 268	factual	The calculation of traffic adjustment is not correct. The value of 0,93 PLN covers only the adjustments resulting from the difference in traffic influencing on costs of the institutions that are not subject to traffic risk sharing - IMWM and NSA (CAA and EUROCONTROL). Correction resulting from traffic should also refer to PANSAs costs adjustment (for these elements of the PANSAs cost that are not subject to traffic risk sharing) (like in table 8. En-route DUR 2014 vs. 2014 unit rate charged to users where the value 0,12 PLN covers the traffic adjustments for PANSAs, IMWM and NSA). Taking into account adjustments resulting from the difference in traffic for all entities – IMWM, NSA, PANSAs – the traffic adjustment should be 0,57 PLN. This change affects the AUC-U (new value 152,99 PLN) and information about percentage change (new value -3,6%). Corrections should be made on the chart and in the last part of table 9.	<p>The basis for calculating the “traffic adjustment” in Box 9 is item 4.1 of the Reporting Tables (Table 2 - all entities). Due to a reference error, the figure published in the draft Monitoring Report (0.93 PLN) was not correct. The correct figure for the “traffic adjustment” should read 0.91. This is the result of the following calculation:</p> <table border="1"> <thead> <tr> <th>Item</th> <th>Reference to the Reporting Tables</th> <th>Amount</th> </tr> </thead> <tbody> <tr> <td>Determined costs (PLN'000)</td> <td>(4.1)</td> <td>64 792</td> </tr> <tr> <td>Actual/forecast TSUs (%)</td> <td>(2.3)</td> <td>94.5%</td> </tr> <tr> <td>Actual TSUs ('000)</td> <td>(2.2)</td> <td>3 931</td> </tr> <tr> <td>“Traffic adjustment” (PLN/TSU)</td> <td><math>= (4.1) \times (1 - (2.3)) / (2.2)</math></td> <td>0.91</td> </tr> </tbody> </table> <p>In your comment, you ask to also include the over/under recoveries from traffic variations to be carried-over (item 3.12 of the Reporting Tables). However, these over/under recoveries are arising from activities of the <b>previous years</b>. For example, in the case of Poland, the inflation adjustment (item 3.2 in the Reporting Tables) that is taken into account to calculate item 3.12 is in fact due to a difference between the actual and the planned inflation rate for the year <b>2012</b>. Since the analysis of the “true cost for users” reflects the unit cost that the users incur in respect of the activities performed in <b>2014</b>, the over/under recoveries from traffic variations to be carried-over (item 3.12 of the Reporting Tables) are taken into account.</p>	Item	Reference to the Reporting Tables	Amount	Determined costs (PLN'000)	(4.1)	64 792	Actual/forecast TSUs (%)	(2.3)	94.5%	Actual TSUs ('000)	(2.2)	3 931	“Traffic adjustment” (PLN/TSU)	$= (4.1) \times (1 - (2.3)) / (2.2)$	0.91
Item	Reference to the Reporting Tables	Amount																	
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“Traffic adjustment” (PLN/TSU)	$= (4.1) \times (1 - (2.3)) / (2.2)$	0.91																	
5	Section: monitoring of SAFETY indicators for 2014;	mistake	<p>Number of assessed occurrences Separation Minima Infringement (SMIs) is 37 which makes 78% out of all 47 reported;</p> <p>number of assessed occurrences Runway Incursions (RIs) is 4 which makes 27% out of all 15 reported;</p> <p>number of assessed occurrences ATM Specific Occurrences (ATM-Specific) is 100%, 43 reported.</p>	<p>After the first round of comments, and cross check with the AST Focal Point data is confirmed. Both Volume 2 and the Dashboard have been updated accordingly.</p>															

# Comment	Reference (Chapter / Section / Para / bullet / etc. in the document)	Type of comment (typo, factual mistake, general, etc.)	Comment	Response
<b>BLUE MED FAB: comments by</b>				
<b>CYPRUS: Comments by</b>				
<b>GREECE: Comments by Konstantinos Simaiakis</b>				
1	Section 11: General conclusions on the Terminal ANS costs and unit rates monitoring/ Page 183	Factual mistake	Suggested to change text into: Note 2: The additional information provided with the RP1 terminal reporting tables indicates that in 2014 the Greek Government decided to subsidize 50% of the Terminal Navigation Charge applicable to TANS at Athens airport for the months August to December. From January to September 2014, a rate of 224.10€ was applied. A discounted rate of 42.79€ was applied for Q4 2014. Regarding the 2012-2013 period the subsidies decided were as follows: For the first trimester of 2012, the unit rate applicable was €228,37 and as from the 1st of April 2012, the discounted unit rate applicable to Athens International Airport was € 74,68. Regarding 2013, the unit rate applicable for the first trimester was € 230,50 and for the period of the 1 <sup>st</sup> of April 2013 until the 31 <sup>st</sup> of December 2013 was € 115,25.	Comment noted. Section 11 has been updated accordingly.
2	Section 10: - Actual data from June 2015 Reporting Tables, Unit Rate Applied, page 183	Factual Mistakes	Due to the subsidization of the terminal navigation charges rate, the unit rate applicable was: 2012: 107,32 2013: 137,94 2014:157,33	Comment noted. Section 11 has been updated accordingly.
<b>ITALY: Comments by</b>				
<b>MALTA: Comments by</b>				
<b>DANUBE FAB: comments by</b>				
<b>BULGARIA: Comments by</b>				
<b>ROMANIA: Comments by Cristina Ioniță</b>				
		general	No comments from Romania regarding the draft volume 2 of PRB Annual Monitoring 2014.	Factual data confirmed.

# Comment	Reference (Chapter / Section / Para / bullet / etc. in the document)	Type of comment (typo, factual mistake, general, etc.)	Comment	Response														
<b>DK-SE FAB: comments by Eva Noréus</b>																		
1	6. - En-route ATSP estimated surplus* Column 2014A – Total asset base p.67	factual mistake	<p>June 2015: The Average asset base in the en route tables for actual year 2014 were – by mistake – including financial assets:</p> <table border="1"> <tr> <td>3.1 Net book val. fixed assets</td> <td>1.005.371</td> </tr> <tr> <td>3.2 Adjustments total assets</td> <td>0</td> </tr> <tr> <td>3.3 Net current assets</td> <td>427.769</td> </tr> <tr> <td>3.4 Total asset base</td> <td>1.433.140</td> </tr> </table> <p>We want to amend the above calculation in the coming en route table by November 2015.</p> <p>Amended calculation:</p> <table border="1"> <tr> <td>3.1 Net book val. fixed assets</td> <td>944.461</td> </tr> <tr> <td>3.3 Net current assets</td> <td>427.770</td> </tr> <tr> <td>3.4 Total asset base</td> <td>1.372.230</td> </tr> </table> <p>The amended calculation is also reported to the PRU/ACE2014.</p>	3.1 Net book val. fixed assets	1.005.371	3.2 Adjustments total assets	0	3.3 Net current assets	427.769	3.4 Total asset base	1.433.140	3.1 Net book val. fixed assets	944.461	3.3 Net current assets	427.770	3.4 Total asset base	1.372.230	We have updated the 2014 Monitoring Report accordingly and inserted an explanatory note in section 7 (note 1) with the details of this correction. We understand from your comment that Denmark commits to amend the 2014 actual Total asset base calculation in the November 2015 Reporting Tables. Therefore the 2014 En-route ATSP estimated surplus has been calculated with the amended 2014 Total asset figure provided in this comment.
3.1 Net book val. fixed assets	1.005.371																	
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1	Military dimension of the plan p.59 and p.75	Factual	FUA has been implemented in Sweden since 1978, before the concept was defined on European level and the benefit is already achieved, therefore it is very hard to increase capacity. Sweden have an implemented extended FUA with the content that no limit in the capacity.	<i>Noted and updated.</i>														
2	Effectiveness of Safety Management p.73	Factual	Delete NUAC after LFV in the line ANSP [LFV NUAC]	Accepted and corrected.														
3	Application of the severity classification of Risk Analysis Tool (RAT) p.73	Factual and General	<p>Due to shortage of staff at The Swedish Transport Agency, a change from ECCAIRS 4 to ECCAIRS 5 in June 2015 and also some total failure of the system, Sweden has not been able to update their AST-data for 2014.</p> <p>Factual 2014 SMI ATM Ground 51% RAT classified not 100 %  RWI ATM Ground 4% RAT classified not 100 %</p>	<i>Noted and updated.</i>														
4	Sweden Monitoring of Capacity p. 75	general	FUA has been implemented in Sweden since 1978, before the concept was defined on European level and the benefit is already achieved, therefore it is very hard to increase capacity. Sweden have an implemented extended FUA with the content that no limit in the capacity.	<i>Noted and updated</i>														

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5	Sweden Monitoring of en-route and terminal cost- efficiency p. 79 Note 1	factual	The figures concerning terminal costs for Arlanda and Landvetter are correct in the Monitoring report. In the June 2015 Reporting Swedish Transport Agency supervision cost has been forgotten.	<p>Taking into account the comment from Sweden, two changes have been made to the PRB Monitoring Report:</p> <p>First, Note 1 has been amended to explain the situation (see text below).</p> <p><i>Actual 2014 terminal costs reported in the Reporting Tables are slightly below (-0.1%) those published in the 2014 NSA Monitoring Report. Sweden indicated during the "fact validation" process that the figures from the Reporting Tables were not correct since the Transport Agency supervision costs had been omitted. The figure used in this report for the actual 2014 terminal costs is therefore the one consistent with the NSA Monitoring Report.</i></p> <p>Second, the figure for the 2014A terminal ANS costs in Box 10 has been amended to align with the figure from the NSA Monitoring Report. Box 11 and comments have also been amended accordingly.</p>
<b>FAB CE: comments by</b>				
<b>AUSTRIA: Comments by Franz Nirschl</b>				
1	6. En-route ATSP estimated surplus / p 21	General	Cost of capital and of costs exempted from cost sharing should not contribute to an estimated surplus but continue to be treated as cost items.	<p>We took your comment on the costs exempted into consideration by including the following additional note in section 7: <i>Note that if the costs exempted from cost sharing reported by Austria for the year 2014 (+6.4 M€2009) are not deemed eligible by the European Commission, the net gain generated by Austro Control on its en-route activity would amount to +11.9 M€2009 instead of +18.3 M€2009.</i></p> <p>Still, the <u>overall estimated surplus</u>, reflects the results for the en-route activity of a given year taking into account the impact of the traffic risk and cost sharing adjustments, as well as the surplus embedded in the cost of capital. Therefore the cost of capital and cost exempted (if deemed eligible) from the cost sharing reflected in the Reporting Tables actually contribute to the estimated surplus.</p> <p>The estimated surplus embedded in the cost of capital for en-route is calculated as the determined RoE (pre-tax) rate multiplied by the value of the equity financing. More detail explanations can be found in the Readers Guide included in the 2014 Monitoring Report.</p>
2	7. - General conclusions on the monitoring of the 2014 en-route DUR/ Conclusion 2nd paragraph / p 22	General	Referring to: "As a result, the cumulative gains amounting to +34.4 M€2009 could be retained by Austro Control on the en-route activity over RP1". In addition to the comment above for paragraph 6 Austria emphasizes the fact that this is an estimated surplus which is planned to be reimbursed over a period from 2014 till 2019.	<p>Comment noted. Just for clarification purpose, it is important to differentiate between the net gains with respect of the Cost sharing mechanisms (i.e. 53.6M€2009 over RP1) and the positive under-recoveries generated due to the traffic risk sharing mechanism, that based on 2015 June Reporting Tables, will be charged to the airspace users over 2014-2019. Therefore, from a cash flow point of view, it is true that part of these incomes have not been recovered yet.</p>
<b>CZECH REPUBLIC: Comments by</b>				
<b>HUNGARY: Comments by Temesi István</b>				

# Comment	Reference (Chapter / Section / Para / bullet / etc. in the document)	Type of comment (typo, factual mistake, general, etc.)	Comment	Response
1	Item 5	factual mistake	The calculation contains 1 083 T€ to be recovered from airspace users (costs exempt from cost sharing) but excludes the -643 T€ to be reimbursed to AUs. However the determined cost contains a higher amount for international agreement the actual cost excludes this amount so this difference should be deducted from the overall gain as HungaroControl has to reimburse this amount to AUs.	The analysis of the net ATSP gain/loss on en-route activity, which is presented in Item 5, focuses on the net result for the air navigation services provided by the main ATSP. Therefore, the determined and actual costs presented in Item 5 are those reported in the main ATSP en-route Reporting Tables and do <b>not</b> include the amounts relating to EUROCONTROL costs (which are included in the NSA en-route Reporting Tables).
2	Item 5-6	factual mistake	It is stated in "note 1" that the KFOR sector's ATCO staff cost which is included in the Hungarian en-route cost base but recovered through the charges of Serbia/Montenegro/KFOR charging zone was deducted from the "actual costs for the ATSP". As the determined cost also contains this amount which is reimbursed to airspace users through other revenues the calculation should reflect this reimbursement. We would like to suggest adding this amount (-1.7 M€) also to the incentives category.	The analysis in items 5 and 6 has been updated to reflect your comment. However, instead of adding a negative amount in the incentives category to reflect the fact that revenues from Serbia/Montenegro/KFOR are passed on to airspace users, we prefer to retain the gross actual costs in Box 5 (i.e. 69 309 M€2009).  The net result is similar to the solution you suggest, but this option helps simplify the text in Note 1 and also brings consistency between the scope of costs taken into account for the determined costs and the actual costs in Box 5.
<b>SLOVAKIA: Comments by</b>				
<b>SLOVENIA: Comments by</b>				
<b>FABEC: comments by Holger Kowoll</b>				
1	FABEC, General	Request	The FABEC Performance Plan and correspondingly the FABEC annual monitoring report provided to the PRU/PRB do foresee parts for FABEC KPAs Safety and Environment. These common FABEC parts of the annual report are not at all reflected in the draft PRB report. FABEC requests PRB to reflect these parts in the FABEC part of the PRB report.	Monitoring of Safety performance in RP1 is on the State level. Safety performance of each FABEC state is shown separately.
2	FABEC, Capacity, p. 95 "PRB capacity assessment", 2 <sup>nd</sup> paragraph	Factual mistake	As stated very often by FABEC, the performance target En Route Capacity for FABEC in 2014 was 0,5 minutes delay per flight. The reference value of 0,4 minutes per flight is therefore not the baseline for comparison.	The PRB is presenting both the FAB targets and the official reference value as referred to in Regulation 691/2010
3	FABEC, Capacity, p. 97 "Airport data"	Friendly advice	Could you please bring the dashboard data in line with the Brussels data in regard of month and year. We discovered that the data download from the dashboard shows two January values in 2008 and none for 2014. We assume the allocation of years is incorrect: January 2013 should be January 2014, January 2012 should be January 2013...	Noted and will be updated accordingly
4	FABEC, Capacity, p. 98 "Specific Analysis"	Methodological mistake	The value of 13% is misleading as "over RP1" implies that the value is comparing 31 Dec 2011 and 31 Dec 2014. In fact, it compares 31 Dec 2012 and 31 Dec 2014. Due to the description the value should be 43%.	The Reference Period 1 is covering the years 2012,2013,2014 and the table is done accordingly. After checking the figures, the 13% for FABEC is correct.



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<b>BELGIUM / LUXEMBOURG: Comments by Laurent Quesnel</b>				
1	General PRB Annual Monitoring 2014	general	A general remark, is about the origin of the data in the PRB Annual Monitoring 2014. Information are different from the annual report send in May 2015. Could you list where are the documents use for complete your report, please?	Response provided. See below.
2	p.101 of the PRB Annual Monitoring Report 2014 - Volume 2 in the frame Application of the serverity classification of the RAT	Question about the data value	2014 assessed SMIs are 100% each yet the value of May 2015 were 98%. Did you use data from Eurocontrol?	The RAT application results for Belgium were amended after a consultation between EUROCONTROL AST (source of data) and the State AST focal point as follows: Application of RAT: SMI 45 occurrences, with 100% ATM Overall  EUROCONTROL has received an update from the AST-Focal Point, confirming that the investigation regarding the last open SMI has been closed. Therefore the SMI's application is now 100% ATM Overall RAT classified.
3	p.105 of the PRB Annual Monitoring Report 2014 - Volume 2 in the frame Minutes of the ATFM en-route delay.		We send only the data aggregated at the FABEC level. Does the PMG send you these data?	For the minutes of ATFM en-route delay, we use the data provided by the Network Manager. We do not receive any data from FABEC PMG.
4	p.105 of the PRB Annual Monitoring Report 2014 - Volume 2 in the frame Airport Data		In the frame Airport Data, are total ... [min]. Where are coming these data?	The other data results from a matching between the data provided by the Network Manager and the data received through the airport data flow.
5	p.112 of the PRB Annual Monitoring Report 2014 - Volume 2 in the frame 10. - Terminal costs and unit rates monitoring (2014),	mistake	The title is Belgium-Luxembourg -. As only the Belgium information are provided perhaps the title may be changed.  Could you inform us where the 2012P, 2013P, 2014P Terminal ANS costs for the charging zone are coming from, please?	Accepted. Report has been updated accordingly.  Belgium-Luxembourg Performance Plan for RP1 did not comprise information relating to planned Terminal ANS costs for the 2012-2014 period. Therefore, for the purposes of the PRB monitoring analysis, it was decided to use the planned terminal ANS costs provided by Belgium in the terminal ANS reporting tables which were submitted to the European Commission in June 2011. Note that this information which was provided at the same time as the National Performance Plans for RP1 has also been used in the PRB 2012 and 2013 Annual Monitoring Reports.

# Comment	Reference (Chapter / Section / Para / bullet / etc. in the document)	Type of comment (typo, factual mistake, general, etc.)	Comment	Response
		Reply on 17/09/2015	<p>The Belgian NSA reviewed the document dedicated to Belgium BE-LUX RP1 Annual Monitoring Report 2014 - Vol 2. The NSA gets no comments on the data present in the document.</p> <p>However all the data published do not come from us as stated in your email and we have no oversight of them. In particular for data provided by the Network Manager we consider to put in place a control process with our ANSP.</p> <p>FABEC may give additional comments on its part.</p>	<i>All comments are dealt with, no changes to the report required.</i>
<b>FRANCE: Comments by Stéphane LAFOURCADE</b>				
1	Monitoring of safety indicators : Table RAT, p115	Factual mistake	RAT RIs 2012 number reported should be 230 and not 120.	Data from 2012 will not be modified, as the data is stable in the AST database and modifications will have a big impact..
2	Monitoring of Capacity indicators : Table Minutes of ATFM en-route delays, p.116	Factual mistake	According to our calculation Actual performance 2014 is 0.65 (0.654 before rounding) and not 0.66	The figure presented is as shown on the PRB dashboard <a href="http://www.eurocontrol.int/prudata/dashboard/pp_view_2014.html">http://www.eurocontrol.int/prudata/dashboard/pp_view_2014.html</a>
3	Monitoring of Capacity indicators : PRB capacity assessment, p.116	General	<p>As recalled in the report, there is no target at national level for en-route capacity. Target is set at FABEC level and plans and arrangements to meet it are managed internally between FABEC ANSP and ACC: reference values calculated by NM are not legal and binding values and should not be used as a reference at national level.</p> <p>Statement that “capacity performance in France for each year of RP1 is not consistent with the performance to meet EU-wide target” isn’t acceptable and misleading: both EU-wide target and FABEC have been met in 2012 and 2013 for example and if it has not been the case at FABEC level in 2014 this is mainly due to industrial action. Statement regarding 2015 – 2019 is out of the scope of a 2014 performance assessment report.</p>	<p>The PRB has not presented a national target for France, but has reproduced the official reference value as referred to in Annex III of Regulation 691/2010.</p> <p>Annex III of Regulation 691/2010 defines consistency in terms of comparison to the reference value provided by the capacity planning process of EUROCONTROL. The PRB has simply reproduced the national reference values for France as were calculated for RP1.</p> <p>The PRB considers the comment on capacity planning to be very relevant especially since capacity planning was already highlighted as an issue during RP1.</p>

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<b>GERMANY: Comments by Holger Kowoll</b>				
0	Germany, Cost Efficiency, p. 134, para 4-6	Remark	The data in table are still under reservation as the German uncontrollable cost data is not yet finalized	Noted.
1	Germany, Cost Efficiency, p. 137, para 10	general	The question is why the terminal data submitted in June 2011 is subject to the determined cost method. This approach is not correct due to the fact that the terminal charges were up to and including 2014 subject to the full cost recovery method. A resilient comparison would only be possible if you look into the data from the year n-1. The arrangement here inevitably achieves an incorrect result, since the terminal data was adjusted yearly during RP1. So in our opinion this calculation should be either changed or removed entirely.	The analysis provided in Box 10 is a factual comparison of actual versus planned costs, and as such it responds to the monitoring requirements foreseen in the Performance Scheme.  In this analysis, the planned terminal ANS costs (as reported in the NPP) are <b>not</b> interpreted as being "determined" costs", and the difference between planned and actual costs is <b>not</b> interpreted as a gain or a loss.
2	Germany, Capacity	General	The document provides values and figures from other sources than the annual NSA reporting. To validate the data we need to know the sources used. Maybe this information could be published in the reader's guide.	As detailed in the Performance Regulation, capacity data is provided by the Network Manager.
3	Germany, Capacity, p. 129, "minutes of ATFM en-route delay"	Unknown values	The reference values presented (2012-2014) cannot be verified by Germany. Please provide us with the underlying source.	The quoted reference values were calculated by EUROCONTNROL and forwarded to the relevant ANSPs on 7 <sup>th</sup> February 2011. They have subsequently been repeated in section 1.6.1 of the PRB assessment for Germany's performance plan in RP1 and in every Annual Monitoring report since then.
4	Germany, Capacity, p. 129, "PRB capacity assessment"	Content	The last sentence on this page should be deleted as it refers to RP2 which is not addressed in this report.	The PRB considers the comment on capacity planning to be very relevant especially since capacity planning was already highlighted as an issue during RP1.
5	Germany, Capacity, p. 130 "effective booking procedures"	Allocation	Although, national values are considered in here, this part should be presented in the FABEC section as it was delivered at FABEC level.	The allocation and utilization of airspace remain a national rather than a FAB responsibility. We received information individually from the separate FABEC states, and therefore have presented them individually.
6	Germany, Capacity, p. 131 "airport data"	Factual mistake	Value for Nuremberg 2014 add. taxi-out time (0.8) is shown as "n/a" in the PRB monitoring dashboard (due to missing August value). PRB data should be consistent in itself.	Noted and the dashboard has been updated accordingly
7	Germany, Capacity, p. 131 "airport data"	Massive mistake	Berlin-Tegel data was delivered in the NSA Report but wasn't considered in this PRB Report. Since the opening of EDDB (Berlin Brandenburg International) is delayed, EDDT is still in use and therefore must still be considered.	Two meetings were scheduled by ADV to discuss the set-up of the airport data flow in Germany, the 1 <sup>st</sup> one on 13 December 2011 and the 2 <sup>nd</sup> one on 13 September 2012. DFS, Airport operators representatives and PRB/PRU attended those two meetings. At the 2nd meeting, it was decided not to include EDTT because this airport was planned to close before end of RP1.
8	Germany, Capacity, p. 132 "specific analysis, first sentence"	Methodological mistake	The value of 39% is misleading as "over RP1" implies that the value is comparing 31 Dec 2011 and 31 Dec 2014. In fact, it compares 31 Dec 2012 and 31 Dec 2014. Due to the description the value should be 72%.	As per EC Reg. 691/2010, RP1 covers the 3 years 2012, 2013 and 2014. The total airport ATFM arrival delay was 760,266 min in 2012 and dropped to 467,087 min in 2014, what results in a decrease of 39%.

# Comment	Reference (Chapter / Section / Para / bullet / etc. in the document)	Type of comment (typo, factual mistake, general, etc.)	Comment	Response
9	Germany, Capacity, p. 132 "specific analysis, last sentence	Question	Please specify how the 6% of "traffic" decrease is measured. We cannot retrace the value.	381,903 movements were recorded through the MUN airport data flow in 2012 vs 356,035 in 2014, what represents a decrease of 7%. These data are available on the dashboard. However, this is to be noted that these figures are filtered based on additional ASMA and taxi-out time calculation, and therefore might slightly differ from the records available in NM. In order to avoid any misinterpretation Volume 2 was corrected accordingly.
<b>SWITZERLAND: Comments by</b>				
<b>THE NETHERLANDS: Comments by Ad van der Westen</b>				
1	Volume 2, Netherlands, page 141, first figure (EoS M States?)	General	1. Fact finding is not possible as the EASA feedback is not yet available [according EASA early October]. Figure is not self-explaining → creates questions; The table includes three scores (State, LVNL and MUAC) where the graphics show only the scores of one organization (State). It is recommended to include the scores of LVNL and MUAC in the graphics.	Thank you for your comment.  EASA has provided EoS M verification results to the PRB, which are reflected in the graph. They present a summary of full feedback that is available to each State upon request.  EASA does not have a mandate to verify service provider scores, ANSP results, as requested by performance regulation, are to be verified by each State. In other words, verification of ANSP results is responsibility of the State.  Therefore, the PRB was able to present only results of EASA verification of State results as the PRB does not have the information on verification results of each ANSP. This information is only available to State. In summary graph with EASA confidence levels are presented ONLY for State level,
2	Volume 2, Netherlands, page 141, application RAT	Factual mistake  General	1) The 2014 RAT numbers are not the same numbers as described in the NL monitoring report 2014; In this context it is remarked that more FABEC states face problems with the AST filtering (this should be limited to the airports included in the RP1 FABEC PP) 2) Preliminary results updated after update with the AST-FP in August 2015 ↔ AST-FP meeting is in mid September, so after the publication of this report. The benefits of the application of AST as a safety performance reporting tool is questionable, taking account of the previous remarks.	Thank you for your comment.  The RAT application results for the Netherlands were amended after a consultation between EUROCONTROL AST and the State AST focal point in August as follows:  SMI: 7, with 8% ATM Ground, 0% Overall. RI 56, with 0% Overall. ATM-Specific: 1119, with 0% Overall.  Update of preliminary results received in August 2015 was done after AST Team cross check with the Netherlands ATS focal point over the phone. However even after contact with the State AST-FP, the correct figures could not be confirmed. Therefore, indeed, final data will be only available at the end of September 2015 (final AST cycle) – which will be available after publication of this report, however correct values will be uploaded to the PRB Dashboard as part of regular dashboard updates.
3	Volume 2, Netherlands, page 143, PRB capacity assessment	Informative  General	1. The Ministry of Infrastructure and LVNL apply the FABEC Amsterdam annual ACC capacity indicative value as a capacity target. The phrase about the capacity performance in RP2 is not relevant in the context of the 2014 monitoring. Kind request to omit this phrase.	The PRB considers the comment on capacity planning to be very relevant especially since capacity planning was already highlighted as an issue during RP1.

# Comment	Reference (Chapter / Section / Para / bullet / etc. in the document)	Type of comment (typo, factual mistake, general, etc.)	Comment	Response
4	Volume 2, Netherlands, page 144, NSA report on follow up to recommendations	Factual mistake	<p>1. The previous recommendations concern FABEC. FABEC has responded to this letter. Thus, it was not necessary anymore to give a follow up at national level.</p> <p>Furthermore, the 0.40 min/flight target is superseded by the RP2 FABEC PP. The NM developed capacity reference values for FABEC in the range 0.42 - 0.43 min/flight. PRB refers to an outdated target, about which FABEC and PRB did not come to an agreement.</p>	<p>The recommendation was never rescinded by the Commission and therefore, in the view of the PRB, remains valid.</p> <p>The PRB considers that the recommendations regarding capacity planning in FABEC during RP1 remain valid for the period of RP1.</p>
5	Page 145, Critical issues	General	<p>LVNL reported already to have reviewed the data available at the PRB dashboard. Still, the information and data are not sufficiently detailed and transparent in order to allow a recreation of the results presented by the PRB. Critical information on the exact traffic data, which is used and the way this data is grouped is still missing. This concerns in particular the additional taxi-out time. Only after the receipt of additional data a further review of the PRB dashboard is not useful.</p>	<p>All the data required <u>and</u> the methodology used to calculate the various PIs are available on the dashboard. Should there be any additional question, LVNL is invited to contact and/or meet the PRU in order to get a demonstration.</p>
6	From page 147 onwards	General	<p>As all figures are expressed in € 2009 it is very difficult to compare PRB's findings with the nominal figures which are commonly used. It is appreciated if next to the figures in € 2009 also the nominal figures were presented.</p>	<p>Comment noted. Given the large number of financial data disclosed in the report, it is not practically feasible to systematically express financial data both in real and in nominal terms. The inflation indices used to calculate the financial amounts in €2009 are disclosed in Box 2. This enables the reader to convert the figures in nominal terms if deemed necessary. If you still find difficulties to reconcile the figures, you can always request a reconciliation table and the PRU will facilitate it.</p>
7	Page 148, General conclusions, Notes on information provided by The Netherlands, Note 1	Factual mistake	<p>The Netherlands adapted the level of the uncontrollable costs 2012 and 2013 in order to relate some data to the relevant data in LVNL's 2012 and 2013 annual financial reports. The data adjustments are of a technical nature implemented after the submission of the annual performance reports.</p>	<p>Text in note 1 completed to reflect The Netherlands' comment.</p>
8	Page 148, General conclusions, At State/Charging Area level, actual 2014 costs vs. NPOP	Factual mistake	<p>Kind request to replace "MUAC costs" by "the part of MUAC costs allocated to The Netherlands"</p>	<p>Text amended to reflect The Netherlands' comment.</p>
9	Page 148, General conclusions, At ATSP level	Factual mistakes	<p>1. Part of LVNL's 2014 loss is due to the freeze of LVNL chargeable en route unit rate.</p> <p>2. LVNL had an equity capital of M€ 6.5 at the start of RP1. Ministry of Infrastructure and the Environment and LVNL agreed to refrain from the inclusion of a Return on Equity in LVNL's RP1 cost base in the context of LVNL's contribution to the building up of the equity capital.</p> <p>3. The freeze of the chargeable en route unit rate in the period 2012 – 2014 is not mentioned as cause for LVNL's 2014 loss.</p> <p>The Dutch State has supported LVNL financially in order to avoid a situation in which LVNL would build up its equity capital and the equity capital would have to be used to cover a.o. the traffic volume risk at the same time.</p>	<p>Comment noted. No correction required.</p>

# Comment	Reference (Chapter / Section / Para / bullet / etc. in the document)	Type of comment (typo, factual mistake, general, etc.)	Comment	Response
10	Page 149, 8. En route DUR 2014 vs. 2014 unit rate charged to users	Factual mistake	The Chargeable Unit Rate 2014 as planned in the RP1 Performance plan was € 65,95. This figure should be compared with the actual 2014 chargeable unit rate (€ 66,47) in order to explain the causes of the difference clearly.	Box 8 provides an explanation of the incremental changes to the DUR (in national currency in nominal terms) to obtain the Chargeable (National) Unit Rate (CUR). The DUR is chosen as the starting point since it is the regulated KPI for cost-efficiency. No correction required.
11	Page 149, 9. En route DUR 2014 vs. 2014 actual unit costs for users	Factual mistake	Users were originally expected to pay a Chargeable Unit Rate 2014 of € 65,95 as planned in the RP1 Performance plan. This figure should be compared with the actual 2014 costs for users (€ 63,48) in order to explain the causes of the difference clearly. A comparison between the actual 2014 costs for users and the DUR 2014 is a comparison between incomparable quantities	Box 9 provides an explanation of the incremental changes to the DUR (in national currency in nominal terms) to obtain the actual en-route unit cost for airspace users (AUC-U) for 2014 (also referred to as the "true cost for users"). The DUR is chosen as the starting point since it is the regulated KPI for cost-efficiency. No correction required.
<b>NEFAB: comments by</b>				
<b>ESTONIA: Comments by</b>				
<b>FINLAND: Comments by Markku Tyynelä</b>				
1	7. General conclusions on the monitoring of the 2014 en-route DUR. Notes on information provided by Finland. Note 1.	typo	Finland confirms that data in the June Reporting Tables is right (i.e. 14 555 500). However, there is also a contradiction between the table 10 "terminal costs and unit rates monitoring (2014)" and Note 1. (14 555 500€ vs. 14 555 000€)	Noted. Now that we know that the information from the June Reporting Tables is the right one and that we are using the correct figure in Table 10, we have deleted note 1.
<b>LATVIA: Comments by</b>				
<b>NORWAY: Comments by</b>				
<b>SW FAB: comments by</b>				
<b>PORTUGAL: Comments by</b>				


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<b>SPAIN: Comments by Ana Gómez-Pineda Luna</b>				
		General	We are grateful to you for the statement that recognizes that the calculates surplus is not real in the Spanish case because of the efforts made by Spain with the stabilization of the chargeable unit rate. We still miss some figures in the final analysis (the calculations) with the actual surplus that the entities plan to be recovered during RP2, because as you know in the Spanish case it is much lower than the quantity that Spain has the right to recover during RP2.	Noted, see respond in comment below.
1	Monitoring of SAFETY indicators for 2014 / Application of de severity classification of the Risk Analysis Tool (RAT)	mistake	The source of RAT data is indicated as "ENAIRES". This is not correct, as ENAIRES has not provided these data and does not support them, as was included as a comment in the data submission (see comment 2 below)	Has been changed in the report accordingly

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2	Monitoring of SAFETY indicators for 2014 / Application of de severity classification of the Risk Analysis Tool (RAT)	mistake	<p>The table is used to provide data either for “ATM Ground” and “ATM Overall”. As indicated in the comments included in the data submission, ENAIRE is the responsible entity in charge for the provision of the data on application of RAT-ATM Ground. This statement is also in line with Decision 2014/132/EU (Article 1.3.c and d) that establishes during RP2 the procedure for the Service Providers in order to inform NSAs about RAT application. As long as in the 2014 Report the Template contains the category “ATM Ground”, ENAIRE cannot support the data included and proposes to delete this part as it will not be consistent with the same report in RP2 from 2015 and it will lead to confusion as not properly explained.</p> <p>However, if the “ATM Ground” information is maintained the data to be included, already provided to the Spanish NSA, AESA, (in line with Decision 2014/132/EU) are the following:</p> <table border="1"> <thead> <tr> <th rowspan="2">ATM Ground</th> <th colspan="2">2012</th> <th colspan="2">2013</th> <th colspan="2">2014</th> </tr> <tr> <th>Nº</th> <th>%RAT</th> <th>Nº</th> <th>%RAT</th> <th>Nº</th> <th>%RAT</th> </tr> </thead> <tbody> <tr> <td>SIMs <sup>(*)</sup></td> <td>189</td> <td>100%</td> <td>153</td> <td>100%</td> <td>196</td> <td>100%</td> </tr> <tr> <td>RI<sup>(*)</sup></td> <td>56</td> <td>100%</td> <td>69</td> <td>100%</td> <td>43</td> <td>100%</td> </tr> <tr> <td>ATM-S <sup>(**)</sup></td> <td>243</td> <td>100%</td> <td>366</td> <td>100%</td> <td>213</td> <td>100%</td> </tr> </tbody> </table> <p>(*) Severity classifications A, AA, B, C, E in ACCs (GCCC, LECB, LECM, LECP, LECS) and airports with over 50.000 movements/year (GCLP, GCTS, GCXO, LEBL, LEMD, LEMG, LEPA)</p> <p>(**) Severity classifications A, AA, B, C, E</p>	ATM Ground	2012		2013		2014		Nº	%RAT	Nº	%RAT	Nº	%RAT	SIMs <sup>(*)</sup>	189	100%	153	100%	196	100%	RI <sup>(*)</sup>	56	100%	69	100%	43	100%	ATM-S <sup>(**)</sup>	243	100%	366	100%	213	100%	<p>During RP1 (2012-2014) the application of the RAT methodology is indeed the responsibility of the State not the Service Provider(s). Moreover the scope covers all SMI, RI and ATM Specific Occurrences irrespective of their Severity. Therefore source of data should be AESA.</p> <p><i>After cross check with Spanish FP the final data for Spain to be reflected at Volume é and the Dashboard are:</i></p> <p><b>SMI: 215 reported; 196 ATM Ground and 93 Overall.</b></p> <table border="1"> <thead> <tr> <th>Country</th> <th colspan="2">2014</th> </tr> </thead> <tbody> <tr> <td><b>Spain</b></td> <td>Number of reported <b>SMIs</b></td> <td>% severity assessed with RAT</td> </tr> <tr> <td>ATM Ground</td> <td rowspan="2">215</td> <td>91%</td> </tr> <tr> <td>ATM Overall</td> <td>43%</td> </tr> </tbody> </table> <p><b>RI: 169 reported; 43 ATM Ground and 7 Overall</b></p> <table border="1"> <thead> <tr> <th>Country</th> <th colspan="2">2014</th> </tr> </thead> <tbody> <tr> <td><b>Spain</b></td> <td>Number of reported <b>RI<sup>s</sup></b></td> <td>% severity assessed with RAT</td> </tr> <tr> <td>ATM Ground</td> <td rowspan="2">169</td> <td>25%</td> </tr> <tr> <td>ATM Overall</td> <td>4%</td> </tr> </tbody> </table> <p><b>ATM Specific: 1176 reported, 213 ATM Overall</b></p> <table border="1"> <thead> <tr> <th>Country</th> <th colspan="2">2014</th> </tr> </thead> <tbody> <tr> <td><b>Spain</b></td> <td>Number of reported - ATM Technical Occurrences</td> <td>% severity assessed with RAT</td> </tr> <tr> <td>ATM Overall</td> <td>1176</td> <td>18%</td> </tr> </tbody> </table>	Country	2014		<b>Spain</b>	Number of reported <b>SMIs</b>	% severity assessed with RAT	ATM Ground	215	91%	ATM Overall	43%	Country	2014		<b>Spain</b>	Number of reported <b>RI<sup>s</sup></b>	% severity assessed with RAT	ATM Ground	169	25%	ATM Overall	4%	Country	2014		<b>Spain</b>	Number of reported - ATM Technical Occurrences	% severity assessed with RAT	ATM Overall	1176	18%
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3	Monitoring of en-route and terminal COST-EFFICIENCY for 2014. 5-Focus on ATSP-“Net” ATSP gain/loss on en-route activity in 2014 & 6-En route ATSP estimated superplus	General	<p>As it is mentioned in the notes, Spain considers this analysis does not provide a clear picture of the economic situation of the ANSP.</p> <p>Although we understand that it is a standard model and homogeneously applied to very different entities, as in previous years we have to point out again that we consider that the analysis is just a kind of theoretical exercise that does not reflect the economic result ( neither the cash flow) of the ANSP.</p> <p>Although the specific Spanish performance it is recognized in the PRB 2014 Monitoring Report, we still miss a line in the final analysis (the calculations) with the actual figure that the entities plan to be recover during RP2, because in the Spanish case it is much lower than the quantity that Spain has the right to recover during RP2.</p> <p>As it is recognized in this report, for some organizations the genuine value of the economic surplus could be affected due to certain limitations of this methodology:</p> <ul style="list-style-type: none"> <li>-the methodology considers pending rights that might not materialize and according to accounting rules cannot even be counted as such, and takes them into account as if they were "real";</li> <li>- the net result amount is taking for granted the total recovery of the rights arising from the traffic risk which for certain organizations, apart from being uncertain in the future, will have to be compatible with adjustment mechanisms and other recovery rights pending from previous years and subject to the charging policy of the State (in the case of ENAIRE the pending amount related to 2014 traffic risk is 59,4 €M2009, more than a half of the presumed result);</li> <li>- the arithmetic exercise carried out does not contemplate possible impacts of the charging policy of the State in order to maintain stability in the chargeable unit rate.</li> </ul> <p>Furthermore, this analysis does not take into account the real income generated, i.e. chargeable unit rate * S.U.</p> <p>Therefore, conclusions extracted from this analysis can lead to a distorted image of the state of the ANSP and in our opinion it's a theoretical arithmetic exercise and it should be recommended to be very careful in the treatment of the results in its true meaning and, besides, it has to be emphasized that the basis of the result is product of the enormous effort of costs reduction that has made possible to offset the great traffic deviation with respect to NPP forecast.</p>	<p>Spain has indicated that their entitlement positive under-recoveries generated due to the traffic risk sharing mechanism, now foreseen to be recovered in the last 2 years of RP2 and in RP3 based on the June 2015 Reporting tables, may not be finally charged to users in future years. If this is finally the case, the 2014 genuine value of the economic surplus over RP1 would be lower.</p> <p>We therefore have introduced a new graph at the right bottom of item 6 showing an estimated surplus calculation based on the assumption mentioned above and explained in note 3 of the 2014 monitoring report. Which actually would mean that Spanish ATSP would retained totally the loss due to the traffic risk sharing mechanism for the years 2012, 2013 and 2014 and therefore wouldn't recovered the chargeable rights to users generated in RP1 under the actual traffic risk sharing mechanism. Where in the case of Spain for 2012, 2013 and 2014, were even more significant, since Spain has considered that the range of the dead-band is not shared and that it is allocated to users (100%) (Spain invoked the application of Article 2 of EU Regulation 1191/2010 amending the Charging Regulation 1794/2006)</p> <p>With respect of you all your explanations covered in your comment. We understand and share some of your concerns in terms of “communication” and possible misinterpretations from some stakeholders. That it is why we have added additional paragraphs in the 2014 Monitoring report Vol.1 in chapter 5 section 6, with the following points and explanations with respect the term economic surplus:</p> <p><i>The estimates the “economic surplus”, compromises the net ATSP gain/loss on en-route activity, and the surplus embedded in the cost of capital.</i></p> <p><i>The economic surplus is different from the net accounting profit disclosed by the ATSPs in their financial statements. The latter includes revenues and costs relating to the provision of terminal ANS, and other activities (e.g. consultancy services) which are not financed through user charges, as well as revenues and costs pertaining to other years of activity, and is therefore not comparable with the notion of economic surplus.</i></p> <p><i>During the Ad-hoc Single Sky Committee of 24 October 2014 some Member States requested further clarification on the economic surplus calculation presented in the PRB Monitoring reports. Accordingly, the PRB provided an information paper on this subject at the SSC55 in January 2015. Some Member States have expressed reservations since the estimated surplus is calculated assuming that the eligible under-recoveries due to traffic shortfall will be charged to users in future years, and this may not be the case for some States, for example Spain.</i></p>
4	Monitoring of en-route and terminal COST-EFFICIENCY for 2014. 5-Focus on ATSP-“net” ATSP gain/loss on en-route activity in 2014	mistake	Difference in total service units (actual vs NPP) should be -11.95% instead of -12.40%.	You are right the correct figure is -11,95% and have been corrected. We confirm that the rests of the calculations with respect ATSP Gain/loss on en-route activity in 2014 display in item 5 are still correct since they were already calculated with the right difference in total service units (-11.95%) and that the wrong figure shown in item 5 was not used in any of the calculations.

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5	Monitoring of en-route and terminal COST-EFFICIENCY for 2014. 7- General conclusions on the monitoring of the 2014 en-route DUR	mistake	The RoE value presented by SPAIN (6.44%) is pre-tax. At ATSP level: ENAIRES (AENA) actual en-route costs in 2014 are 539.0 M€2009.  As noted in comment 2 the following paragraphs should be corrected: In 2014, actual traffic was -12% lower than planned.  In the context of actual traffic in 2014 that was overall -12% lower than planned.	Corrected accordingly in note 1.  We take note of your comment but ENAIRES actual en-route cost in 2014, taking into account the "correction" explained in note 1 ( <i>Correction to the 2014 actual cost of capital reported</i> ), are 564.6 M€2009 instead of 539.0 M€2009. Therefore this is the figure that has been used  Corrected accordingly in the General Conclusions (section 7).
6	Monitoring of en-route and terminal COST-EFFICIENCY for 2014. 9- En-route DUR 2014 vs 2014 actual unit cost for users	General	The AUC-U calculation is based in some of the principles as the estimated en-route surplus of the ANSP. Consequently, it also takes into account under-recoveries generated that have not been translated into real charges for the users. From the user's perspective, the analysis in section 8 (chargeable unit rate) provides a more accurate calculation of the real price paid for the services.	We take note of your comment. As you mention we present 2 different analyses in section 8 and 9. Section 9 Shows The AUC-U or "true cost for users". The users have expressed that this calculation provides a more accurate calculation of the cost that airspace users genuinely incur in respect of the activities performed in 2014. As you mentioned it takes different adjustments haven't been charge but that will be charge to users in futures years and have been generated in relation with the activities of 2014.
<b>UK-IE FAB: comments by</b>				
<b>UK: Comments by Bronwyn Fraser</b>				
		General	The CAA has reviewed the draft volume 2 of the PRB Annual Monitoring for 2014 and is content with the numbers and data it contains, and as such we have no comments.	Confirmation noted.
<b>IRELAND: Comments by Anthony Eiffe</b>				
1	Page 204, Section 7, Note 3, Terminal Unit rate	Factual update	This section currently begins "IAA's terminal charges are subject to price cap / economic regulation by the Commission for Aviation Regulation covering the years 2012-2015"  This should now end with 2012-2014. The Commission for Aviation Regulation's remit for this ended in 2014. The Irish NSA is responsible for 2015 onwards.	Text corrected to reflect Ireland's comment.

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2	Page 203, Section 5.Focus on ATSP "Net" ATSP gain/loss on en-route activity in 2014	Data question	<p>We can trace most of the balances and reported targets/actuals back to the June 2015 submission and/or the Performance Plan. However, we would be very grateful if you could confirm the exact formula calculation for the three balances identified below:</p> <p>Section 5.Focus on ATSP "Net" ATSP gain/loss on en-route activity in 2014</p> <ul style="list-style-type: none"> <li>-Actual costs for the ATSP – 87,758</li> <li>-Determined costs after deduction of costs for exempted VFR flights – 100,482</li> <li>-Revenue/costs for the en-route activity – 97,196</li> </ul>	<p>A document including the detailed calculations has been provided to Ireland (see attached document).</p>  <p>2015-09-17 Response to Ireland's</p> <p>Ireland then replied on the 18/09/2015 indicating that they were satisfied with the PRU explanations. The response from Ireland is copied below:  <i>"Dear Giovanni,  Thank you for your comprehensive response, which very clearly outlines how the figures were arrived at. The Irish NSA can now confirm that we are satisfied as the factual accuracy of these values as stated in the PRB 2014 Monitoring Report.</i></p> <p><i>Your assistance and prompt response is much appreciated, especially at this very busy time for you and your team.</i></p> <p><i>Best regards,  Anthony"</i></p>
3	Page 206 –Section 10 Table-Terminal costs and unit rates monitoring (2014 Terminal)	Factual Update	The Terminal actual determined costs for 2009 are stated at €25,621,000. The reported actual determined costs per our submitted tables in June 2015 were €21,783,000. The remaining years actuals agree with the June 2015 tables.	Comment noted. However, the data source used in the Monitoring Report is the RP1 NPP, not the Reporting Tables. In the Ireland NPP for RP1 (page 25, table 12) the terminal actual determined costs for 2009 are stated at €25,621,000.
4	Page 203 Table & Graph Section 6. - En-route ATSP estimated surplus	Factual Update	In the graph on page 203 the bar chart for 2014 seems to be incorrectly represented. It is stated at > €18m when the report table states €16.18m. (2012 and 2013 seem to be in line with data listed in table).	Graph corrected to reflect Ireland's comment.