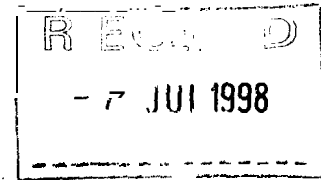


6 July 1998



Commerce Commission  
PO Box 2351  
Wellington

**PRICE CONTROL STUDY OF AIRFIELD ACTIVITIES**

The Board of Airline Representatives New Zealand, Inc [BARNZ] has an interest in the Commerce Commission's study on whether price control should be imposed on airport activities at Auckland, Wellington and Christchurch airports,

BARNZ comprises 22 member airlines operating scheduled international and domestic services (a current list of members is attached.) It consequently represents the largest group of airport customers. Decisions in BARNZ are undertaken by consensus or where this is not possible, by a majority vote,

Although BARNZ may take a position on an issue individual members remain free to present their own views separately

BARNZ welcomes the opportunity to comment on the Commission's proposed approach and timetable and any preliminary issues arising out of the Minister's request to the Commission.

In our view the scope of the study should not be limited to airfield activities but should be expanded to include all airport activities (as defined in the Airport Authorities Amendment Act 1997) supplied or acquired in a market in which competition is limited or likely to be lessened. This would capture all facilities and services to be taken into account by airports in determining their aeronautical charges and thus ensure these activities are subject to price control in accordance with the Commerce Act.

Further, the proposed timetable for the Commission's 'price control study does not make adequate provision for the formal phase of the study in 1999. As an industry association BARNZ is required to consult with its members and solicit their views prior to making a submission, An interval of 6 - 8 weeks should be allowed in the proposed timetable to enable this to occur,

BARNZ intends to make submissions on issues arising out of the Commission's study and if required would be willing to do so in electronic format. BARNZ also has no objection to making its submission publicly available but reserves the right to request that sensitive material be withheld from public disclosure,

We would be happy to expand on any aspect of these comments.

Yours sincerely

  
**John H Webb**  
**Executive Director**

attached: 1

# BOARD OF AIRLINE REPRESENTATIVES NEW ZEALAND (INCORPORATED)

## MEMBERS AS AT 30 JUNE 1998

Mr Serge Kotlarevsky	General Manager	Aircalin
Mr Vince Dennehy	Manager Contracts & Charges	Air New Zealand
Mr Graham Rea	Chief Financial Officer	Ansett New Zealand
Mr Alex Mon	Manager NZ	Aerolineas Argentinas
Mr David Barlow	Regional Manager	Air Pacific
Ms Jeanette McKeague	Manager NZ	Air Vanuatu
Mr Don Clarke	Manager NZ	British Airways
Mr Steve Rice	General Manager	Canadian Airlines
Mr David Figgins	Manager NZ & Pacific Islands	Cathay Pacific Airways
Mr Richard Lin	Manager NZ	EVA Air
Mr Uun Setiawan	Manager NZ	Garuda Indonesia
Mr KS Noh	Director NZ	Korean Air
Mr Kiyoshi Nagotani	Regional Manager NZ	Japan Airlines
Mr Dzielkefli Zakaria	Area Manager	Malaysia Airlines
Capt John Jones	Operations Manager	Mount Cook Airlines
Mr Toalepai Lui Tautolo	Manager	Polynesian Airlines
Mr Michael McNally	Manager NZ Airports	<b>Qantas Airways</b>
Mr Benard Lal	Regional Manager	Royal Tongan Airlines
Mr BK Ong	General Manager	Singapore Airlines
Mr Patrick Schuester	Manager NZ	Solomon Airlines
Mr Ruangyos Pamon Montri	General Manager NZ Fiji & Tahiti	Thai Airways
Mr Peter Walsh	General Manager NZ	United