

19 AUG 1999

BARNZ SUBMISSION TO COMMERCE COMMISSION ON THE PROPOSED TIMETABLE FOR PROGRESSING THE PRICE CONTROL STUDY OF AIRFIELD ACTIVITIES

This submission is in response to the Commerce Commission's request of 6 August for comments on the proposed timetable.

INTRODUCTION:

As indicated in our letter to the Commission on 4 August 1999 we see it as very important that the Commission continues to maintain an active overview of the sector during the forthcoming period.

PROPOSAL:

To best achieve this we propose the following:

- (1) Initial Submissions from the parties to the Commerce Commission should be lodged by 1 December 2000.

Note: These submissions should be based on the issues identified in the Commission's July 99 Critical Issues Paper (amended to reflect the changes that are actually made in the Commerce Legislation.) The submissions will be made in the light of the 1999 consultations and the information provided by the airport companies for the 99/00 financial year pursuant to the Information Disclosure Regulations.

- (2) Draft Interim Report from Commerce Commission produced and circulated to parties by 1 April 01.
- (3) Conference held with interested parties to allow sharing of information on their positions, (June/July 01)
- (4) Submissions from parties on Interim Report to be lodged with Commission by 1 October 01.
- (5) Commerce Commission's Interim Report to the Minister. (1 December 01)

Note:

- (a) This Interim Report would cover all the significant issues and the Commission's views on them as well as the Commission's programme for the coming period to allow a final report to the Minister by 1 August 2002.
- (b) It could be that the timetable for 2002 contains the same elements and much the same timing as is contained in the Commission's proposal of 6 August 99, however we suggest that the Conference precede rather than follow the lodging of submissions so that the parties have an opportunity to understand the position of others and to make adjustments if these are considered to be appropriate.

We believe that this programme will achieve the objective of maintaining an ongoing involvement of the Commission including gathering information and evidence as the Commission has already been doing over the past 6-10 months. In this regard we would be very concerned if the whole study was put on hold for the next 2½ years. Two of the principal reasons put forward in our request for a rescheduling of the study were based on the fact that the effect of the Information Disclosure Regulations in terms of influencing the information that will be released will not emerge until November 2000 and that AIAL and CIAL have still to consult under the new regime. In addition it is not yet clear what changes will be made to the regulatory framework as contained in the Commerce Act. When changes are made the context of the Study could well be changed.

If you have any queries over the contents of this submission or if you wish to discuss any aspect of it please contact me.



Stewart Milne
Executive Director

18 August 1999