

IATA response to Airways NZ Consultation Paper: AUCKLAND ATC TOWER REPLACEMENT

20 October 2022

Question 1: Do you have any feedback on the Auckland ATC Tower replacement options outlined?

The three options presented provide adequate scope for possible solutions for long-term replacement of the tower at Auckland Airport however should there be an additional interim option for short-to-medium-term coverage that considers extending the current facility until there is more known about the viability of a digital solution?

Additional detail would be helpful in considering the listed options including the proposed construction methods for the physical towers, expected lifespan of each option, and the operational impact delivered in terms of required resources to maintain the asset and deliver the air traffic services.

Can it also be clarified if the digital contingency system in Option 2 would be the same system used within the hybrid proposal or a separate system altogether?

Regardless of final solution selected, all presented options should demonstrate cost effectiveness and provide potential safety enhancements and no safety reductions.

Question 2: Do you have any feedback on Airways preferred approach for the replacement of the Auckland ATC Tower?

Reflective of feedback received from member airlines, IATA ASPAC is of the opinion that Option 3 – Digital Tower should be explored as the preferred solution until and unless it is clearly demonstrated that the option is untenable due to safety or technical considerations. As well as advances in technology, we are aware that there has been significant progress in regulatory guidance, performance standards and experience in operations as a contingency tower solution in multiple locations globally. We recommend Airways NZ continue to closely study guidance and precedent set by EASA, UK, CANSO, Budapest Airport and the document ED-240A – ‘Minimum Aviation System Performance Standards (MASPS) for Remote Tower Optical Systems’ as initial suggestions.

We believe given the organised traffic mix and disposition in Auckland (limited circuit traffic), a digital solution would be a viable outcome for service delivery if proven safe. As discussed in Airways’ virtual briefing session on Friday 30th September, it is imperative that the NZ Regulator has in place all necessary rules and safety guidelines under which a digital tower service delivery can operate. Only if Option 3 is demonstrated as not meeting safety standards then Option 2 – Hybrid Physical Tower could be pursued.

Question 3: Do you have any feedback on the changes highlighted to the Capital Plan in 5.1?

Option 3 – Digital Tower provides significant savings compared to Options 1 and 2. It would seem good practice to pursue this option as preferred and then if proven unviable the lessons-learned can form part of the hybrid solution and only then need to incur additional cost if necessary.

Are there any tax advantages from the different options? For example, could early exploration of digital solutions be considered Research and Development for tax considerations? How different are the depreciation schedules of each option based on their differing life cycles?

Can it be clarified that if WiP is not part of the cost-base until the asset is delivered into service, why are there material figures allocated to the financial years prior to 2027? And in terms of possible delays or cost-creep to deliver the final agreed solution, how will allocation of project risk be determined particularly where cost-base has assumed operational from a date, but service delivery hasn’t commenced?

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