TNC Pricing Proposal Inequities

I am the owner/operator of Vultee BT-13 VH-JKV. This aircraft has a MTOW of some 1970kg and attracts a TNC of \$29 per landing.

The weight based TNC has the effect of applying a disproportionate charge to warbird and ag/fire aircraft, which have significantly higher MTOWs than most single engine VFR GA aircraft.

The overwhelming majority of Australian warbirds are single engine two seat trainers which are exclusively VFR. They are comparable in design, purpose and use to GA trainers such as the Cessna 150 and Piper PA-38. These GA trainers have a MTOW well below 1 tonne, typically about 800kg. The North American T-6, typical of our warbird fleet, has a MTOW in the order of 2500kg.

The outcome is that the T-6 is charged about \$38 to land at an Airservices Towered Airport, while the Cessna/Piper is charged about \$12.

Warbirds are being charged a TNC equal to or greater than the TNC charged to IFR multi passenger commercial GA aircraft. A VFR T-6 pays a similar charge to an IFR Charter Baron; an RA-AUS registered Jabiru would be billed nothing for operating in the same manner, at the same time, as the T-6.

It is not reasonable that warbird owners pay inflated charges compared to other VFR users. New Zealand Airways Corporation has a more equitable pricing structure for heavier VFR aircraft, applying separate Aerodrome and Approach charges and a weight based formula with a minimum charge.

The new agreement presents an opportunity to remove this inequity. I propose that warbirds with an MTOW greater than one tonne be charged the one tonne fee, as we would then pay a similar charge to other VFR users for the same service. This would deliver an equitable outcome similar to the New Zealand model, without the complexity of their formula.

That will also allows warbird owners access to the \$500 'infrequent user' threshold available to other light aircraft owners . I try to fly my aircraft weekly, and with the \$29 TNC the \$500 threshold is reached in 17 flights . A Cessna 150 owner, flying at the same rate as me each year, would stay below the threshold, and so never pay Airservices any charges while I pay around \$1500.

A reduction in TNCs for heavier VFR aircraft would quite likely result in greater income for Airservices, as it removes the incentive to avoid towered airports or avoid flying during tower hours.

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