BEFORE THE
U.S. DEPARTMENT OF TRANSPORTATION
WASHINGTON, D.C.

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In the matter of:)
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)
Agency Information Collection Activities:)
Requests for Comments; Clearance of a   )   **Docket DOT-FAA-2021-0067**
Renewed Approval of Information   )
Collection: Renewed Approval of   )
Information Collection: and Schedule   )
Analysis   )
)

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COMMENTS OF AIRPORTS COUNCIL INTERNATIONAL – NORTH AMERICA

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1. **Background**

1.1. ACI-NA is the voice of North American airports, representing local, regional, and state governing bodies that own and operate commercial airports in the United States and Canada. Our members represent more than 300 airports operating in the United States and nearly 400 aviation-related businesses. ACI-NA member airports are responsible for approximately 95 percent of the domestic and virtually all of the international scheduled airline passenger and cargo traffic in the United States.

1.2. ACI-NA and its Slot Task Force, comprising all Level 2 and Level 3 airports across North America, are working collaboratively with the United States Department of Transportation (DOT), the Federal Aviation Administration (FAA) and other stakeholders to align schedule facilitation and slot allocation processes with global practices, with the prime objectives of stimulating competition at congested airports, enhancing transparency of the slot allocation process, and increasing the accountability of all stakeholders, for the benefit of the entire aviation system in the U.S. and beyond.

1.3. As such, ACI-NA would like to offer comments on the information collected by the FAA from U.S. and foreign air carriers holding a slot or an approved operating time at Ronald Reagan Washington National Airport (DCA), John F. Kennedy International Airport (JFK), LaGuardia Airport (LGA), Los Angeles International Airport (LAX), Newark Liberty International Airport (EWR), O'Hare International Airport (ORD), and San Francisco International Airport (SFO).

2. **Information should be collected from all interested parties: airport data should be the basis for runway capacity declaration**

2.1. While the FAA notice describes information collected from air carriers, it is silent about information collected from airport operators. Airports have an at least equal interest to airlines in the slot process. A robust schedule facilitation and slot allocation process must also rely on airport data and information.

2.2. The FAA is establishing limits to scheduled air traffic at Level 2 and Level 3 airports without collecting information in the administrative record on the runway capacity limits from the airport operators themselves.

2.3. Airport operators have an acute knowledge of their runway capacity and a vested interest in the safe and efficient use of their airfield. As such, they should be consulted prior to establishing schedule facilitation and slot coordination parameters at Level 2 and Level 3 airports.

2.4. FAA should collect, on an annual basis, a runway capacity analysis from each airport it designates as Level 2 or Level 3, in line with the provisions included in Chapter 6 of the Worldwide Airport Slot Guidelines. Such information should form the basis of the runway capacity declaration and be incorporated into the determination of the coordination parameters used to allocate approved operating times at Level 2 airports and slots at Level 3 airports.

3. More robust information is required to grant service priority at Level 2 airports and historic precedence at Level 3 airports

3.1. The most accurate slot utilization data is critical to ensure that the "use it or lose it" policy giving historic precedence to carriers for slots they use more than 80% of the time is indeed based on accurate, credible, and robust data.

3.2. ACI-NA notes that the practice in the U.S. of having carriers self-reporting their slot utilization is an oddity at the global level and may lead to conflict of interests as it gives carriers that may lose highly priced slots at Level 3 airports the responsibility to self-declare if they indeed meet the utilization criteria required to keep their slots. To remove this conflict of interest, the Worldwide Airport Slot Guidelines provide that when it comes to best practices related to the use of data in the slot performance process, "Data should be taken from the most accurate and consistent source available at the airport – this source is typically (but not exclusively) held by ATC or the airport managing body" (WASG 12.9 refers).

3.3. ACI-NA urges the FAA to collect information from alternative sources, or at least to supplement the data collected from air carriers by alternative sources, to ensure that historic precedence is granted to airlines based on independent, robust, and credible utilization information.

3.4. ACI-NA notes that additional information should be collected from air carriers or alternative sources, at Level 2 airports. No information is collected regarding the use of approved operating times at Level 2 airports, even though services operated as approved during the previous equivalent season have priority over new demand for the same timings in the next equivalent season. The FAA should consider collecting information on the actual usage of approved operating times either from alternative sources, or at least from air carriers, to ensure that priority as Level 2 airports is granted to airlines based on independent, robust, and credible information.

4. Best practice guidelines for availability of slot and schedule information

4.1. ACI-NA notes that airports, airlines and slot coordinators have worked jointly at global level to issue best practice guidelines for availability of slot and schedule information which were incorporated in the Worldwide Airport Slot Guidelines in 2024.

4.2. ACI-NA invites the FAA Slot Administration Office, in its runway coordinator capacity, to give full regards to the best practice guidelines and implement its key provisions:

WASG 12.10: Best practice guidelines for availability of slot and schedule information
To assist the airport managing body in monitoring demand, providing the infrastructure necessary to handle planned airline operations, and enabling effectual capacity declarations, the below set of information should be provided by the coordinators to the airport managing body for each scheduling season.
The data should be available on the coordinator's or facilitator's website to facilitate access. If website access is not available, the coordinator or facilitator must make the data

available to airlines and to the airport managing body upon request, after SAL and prior to the Slot Conference. Information which should be provided:

  i. *Utilization of coordination parameters in the form of the set of the most limiting factors for the allocation process (list of what is (are) the most limiting coordination parameter(s) for their airport for the season).*
  ii. *Historic lists data.*
  iii. *As soon as all SALs are distributed for their airport(s), coordinators and facilitators must make the data for that airport available to all airlines and to the airport managing body. This data must contain full details by airline of all allocated times and outstanding requests and be up to date at the time of the request (Waitlist Information Request (WIR) and Schedule Information Request (SIR)). Airlines should use SIR and WIR formats as described in SSIM Chapter 6 for these requests and the data should be provided to them in SIR and WIR format, including waitlist tags, as described in SSIM Chapter 6.*
  iv. *Slots allocated to airlines with New Entrant status.*

5. Robust data collection is required in context where the FAA has been alleviating carriers' slot usage requirements

5.1. The collection of information is required to ensure the robustness, credibility, and fairness of the schedule facilitation and slot allocation process and ensure that slot policy is sound and responsive to aviation stakeholders and the travelling public. The importance of collecting exhaustive data cannot be overstated, particularly in a context where the FAA has been granting waivers of slot usage requirements and approved operating times at a number of Level 2 and Level 3 airports across the United States.

5.2. Moving forward, it is crucial that the FAA discontinues the practice of granting waivers without a thorough evaluation of their impact on airport operations and scheduling processes. Decisions related to waiving slot usage requirements should be taken in consultation with airports and be data-driven.

6. The FAA Slot Administration Office needs adequate systems to support the collection of information and its transparent dissemination to airport operators

6.1. ACI-NA notes the need to equip the FAA Slot Administration Office with modern IT tools able to handle such data and share it with interested parties such as Level 2 and Level 3 airports.

6.2. As such, ACI-NA encourages the procurement of an online portal solution that allows users – including airport operators – to access the coordinator's databases and retrieve information relating to real-time airport slot availability and schedule information.