

# SCHEDULE “B”

## SUMMARY OF MEMBERS SUBMISSIONS

We set out hereunder a summarised version of the various submissions / contributions / complaints of our members. These are provided as an illustration of the extent of their concerns and are largely unedited. Although specific arguments are repeated by certain user groups we leave them intact to show unity in our awareness of those issues.

### FLYING CLUBS AND TRAINING SCHOOLS

(Submission by Pieter Wesselman, Chief Flying Instructor, Good Hope Flying Club)

Cape Town International Airport

#### A. History

In the past there were two airfields in Cape Town. D.F. Malan Airport for the scheduled traffic and Youngsfield for the private flyer.

During the era of undemocratic government, when the military was a state within a state and took as they pleased, Youngsfield was taken from the private flyers and became an army camp. The flying club operating out of Youngsfield was relocated to D.F. Malan Airport for the time being until a "**suitable alternative was found**".

This "suitable alternative" had to be created and since the government of the time never made any funds available it was never "found".

Over the years the flying training fraternity at FACT has shown healthy growth and was also joined by a number of private aircraft owners, charter operators and "executive" aircraft operators. This healthy growth also resulted in the establishment of various AMO's. All the above operators are grouped under the heading of "**general aviation**".

Unfortunately not only did general aviation grow, so did the scheduled domestic and international traffic in and out of Cape Town International Airport. Especially after the demise of the previous government in 1994.

**B. Unfortunate facts.**

1. With the increase in both general aviation movements and the movements of scheduled airlines at FACT the infrastructure at FACT has come under stress.
2. Two institutions supply services at FACT they are ACSA and ATNS.
3. ACSA services are broadly:
  - a. supply of parking (aprons),
  - b. supply of runways and taxiways.
4. The runway capacity is limited due to the lack of high speed turn offs into the Taxiways.
5. The increase in the runway capacity is not to be expected in the foreseeable

future because the development of FACT is not a top priority for ACSA.

6. ATNS supplies the control on the taxiways, CTR, TMA etc.
7. The number of services ATNS supplies, at any given time, is dependent on the work load any one controller can handle.
8. The workload of any one controller in FACT is high, especially the workload of a ground and tower controller.
9. The workload limitations of a controller limit the number of movements any controller can handle.
10. The movements at FACT can be divided into IFR and VFR.
11. IFR movements are mainly scheduled airlines and part of the general aviation movements.
12. VFR movements are only general aviation movements.
13. In income terms ATNS acquires the bulk of its revenue from IFR flights.
14. Consequently when movements have to be limited and/or reduced they have to VFR movements.

### **C. General aviation.**

General aviation can be divided into;

- Ad. 1. Executive aviation. Due to the aircraft generally operated, IFR traffic.
- Ad.2. Air charter. Mainly IFR traffic.
- Ad.3. Private flying. Mainly VFR.
- Ad.4. Flying training. Mainly VFR, except teaching IF flying and IF approaches.

#### D. Perceived ATNS policy

Restrict VFR movements at FACT or

Get rid of VFR movements altogether.

We much rather spend our time serving high paying customers than low paying customers.

#### E. Perceived ATNS strategy

Restricting VFR movements is a waste of time because due to the priority given to IFR flights the movements of VFR traffic become automatically restricted.

Increase the cost structure for VFR flights, which will either put them out of busyness or force them out of CIA.

The latter was attempted in 2001 with the **"peak hour"** charges, which did not work.

A new attempt is made with the new ATNS charges and the reduction of the training discount from 80% to 50% and the facing out of these charges over five years.

#### F. General consequences

The majority of private owners will be forced to sell their aircraft because they have nowhere to go since the **"suitable alternative"** has never been **"found"** and consequently have nowhere to go.

The training establishment also has nowhere to go due to the lack of a **"suitable alternative"**. **They will have no choice but to close their doors.** It might be a bit

easier for the helicopter schools since helicopters do not need runways.

The consequence for the AMO's is not part of this section of the presentation.

### **G. The function and duties of the training establishment.**

The duty of a flying club is:

**to provide quality tuition to as large as possible a sector of the population, to deliver to the industry top quality, highly competent pilots and to do so at the lowest possible price.**

Ad.1. The population is divided vertically in numerous social and/or income levels.

When I entered the aviation industry thirty years ago, I was amazed how low down the ladder it was possible to learn to fly and to start an extremely exiting and challenging career. Over the years, due to the very radical cost increases, the entry level into the aviation industry moved higher and higher up the social ladder.

Under an undemocratic government a large part of our population was denied entry into this industry. This all changed in 1994. However, as a result of the high entry level on the social ladder it is still highly impossible for members of the so called "**disadvantaged community**" to enter the industry.

Ad.2. By training in a professional and therefore demanding environment like FACT a much higher level of competency is achieved than is possible at, par

example, so called uncontrolled airports. Many of our students are now flying for our national carrier and other domestic airlines. When after 1994 the world opened up for us, various of our students joined overseas airlines while some are making a name and keeping our flag high overseas as instructors.

Ad.3 The clubs can only do so by keeping their costs low. This is partly achieved by:

Being registered as a so called article 23, non-profit making company.

Underpaying their ground and their flying staff.

Very effective cost control management.

Gratefully accepting the training discount offered by the previous government for training at, then called, government airports. This discount, was maintained by the democratically elected government that came into being in 1994. Neither was this discount changed when the Department of Transport handed responsibilities for the airports and the air traffic services over to ACSA and ATNS respectively.

Why do we say "**partly**"? Because we have no control over our external costs. What are our external costs?

Insurance.

Lease.

Maintenance.

Landing fees.

ATNS charges.

## **H. Importance of a healthy, high quality, training establishment**

The training establishment at FACT delivers to the economy:

private pilots,

instrument rated private pilots,

commercial pilots,

instrument rated commercial pilots,

instructors of all grades,

airline transport pilots

of very high standard.

Why does the training establishment at FACT deliver pilots of such high quality?

Due to the very high demands the training establishments place on their students.

Due to the highly professional and challenging environment in which our students learn and grow.

**THE HIGHER THE COMPETENCY OF A PILOT AT THE ENTRANCE  
LEVEL INTO THE ECONOMY THE LESS THE ECONOMY HAS TO  
SPEND TO FURTHER TRAIN THEM.**

## **I. The price students and pilots pay to learn and fly out of at FACT**

Comparison between operating at FACT and at a so-called uncontrolled aerodrome.

<b>At Cape Town Intl. Airport</b>	<b>At uncontrolled aerodrome</b>
Landing fees	Low or no landing fees
High leases	Low leases
ATNS charges	No ATNS charges
Long taxi distances	Short taxi distances
Number so much in the queue for departure	Usually no queue for departure
Fouling up of plugs while waiting for take-off clearance	Never to have to wait long enough before take-off to foul up the plugs
Zone can be declared IMC	Always VMC
ATC can declare IFR only	No ATC to declare anything
Holding for re-entry into the zone	No holding before re-entering the traffic pattern
Holding on down wind	No holding on down wind
Having to brake off when on final approach	Never having to brake off when on final approach
Large circuit	Small circuit
Wake turbulence	No wake turbulence
Jet blast	No jet blast.

All the above is very negative for learning to fly at or operating out of FACT. Then why do so many people want to fly and operate out of FACT?

**Because there are people who do not want to be part of the crowd. They want to stand out in the crowd. They want to be a cut above the rest. They want to be tops. They can only be what they want to be when they learn to fly at and operate out of CIA.**

**However, even these people cannot go beyond their means.**

**J. Why does ATNS follow this policy and strategy?**

According to ATNS general aviation takes 35% of our time and contributes 1% to our income.

Airlines are of the opinion that they are subsidizing general aviation. This is in a weight based charging system.

Ad.1. ATNS did not supply us with a break down of the 35% into the various sectors of the GA industry as set out in section C of this presentation. Neither did ATNS give us any info on what part the training establishment at FACT is of the 35%. Neither does ATNS states how much of the 1% the training establishment at FACT contributes to its income. Though we will gladly accept the fact that it is a very small part.

We may ask ourselves whether ATNS desire to please the major airlines is not the cause that the contribution of general aviation to its turnover is only 1%.

Anywhere in the world the major airlines have always existed on the back of their national governments. They have always operated out of a monopoly position. Any entrant into the aviation industry is seen by them as a threat to their existence. Such a threat needed to be terminated. General aviation is seen as a threat to their existence and as a result of this general aviation is opposed by them anywhere in the world.

Still all the Fortune top 100 companies are among the top 100 companies because they own and operate their own aircraft with all the benefits it brings. What is the contribution of those top 100 companies to their relevant economies compared to the contribution the airlines make to the economies of the countries in which or out of which they operate?

Where do the people come from that fly the aircraft that these top 100 companies own and operate? Do I really have to give the obvious answer!

When the major airlines would spend less time trying to intimidate organizations like ATNS in order to pay less for the services provided then they might have spend more time studying the trends in the market and then they would not have given the "**low cost airlines**" a chance to cut the grass away from under their feet. These so called low cost airlines would never have had a chance to get of the ground.

Ad.2. Are airlines really subsidizing general aviation? We are not so sure of that.

They say that a general aviation aircraft receives the same service as they do but for that service the airline pays a higher fee because he is bigger and therefore heavier.

We need to ask ourselves the question: "**Why are the aircrafts of the airlines bigger and heavier than those of general aviation?**" There are many

answers to this question. Let us look at some of them.

Due to the lack of adequate airspace it made sense to reduce the number of aircraft in the airspace. However, the number of passengers and the amount of freight kept on increasing. In order to reduce the number of aircraft in the airspace and at the same time supply and satisfy the market, aircraft had to increase in size.

Runways can only handle an X amount of aircraft per hour. With an ever growing market to satisfy and not exceeding the capacity of the runways at a certain airport, aircraft had to increase in size.

Aircraft have to be retired at some stage and replaced by new aircraft. The development costs of aircraft are enormous. However, the increase in costs for the development of new aircraft is inversely proportional to the size of the aircraft. Development costs determine the buying price of an aircraft. The real price of new aircraft per seat mile comes down with the size increase of the aircraft. There are economies of scale when buying bigger aircraft.

Slots at airports are limited. There are popular slots and there are consequently also unpopular slots. The more passengers one can carry in the popular slots the better for business. In order to benefit from this very simple fact, aircraft need to increase in size.

When an airline can only have so many slots at FACT and it wants to obtain a certain share of the market that airline will have to increase the size of its aircraft in order to achieve its market share.

Last but not least, the larger the size of the aircrafts in ones fleet the less aircraft one needs in order to satisfy the market, the less crews one needs in

order to fly those aircraft. Consequently **size pays**.

Here are only a few reasons why operating large and therefore heavy aircraft makes economic sense. What does not make economic sense is to base the cost for the service provided to an airliner on the weight of the aircraft. What makes sense is to base the cost for service supplied on the capacity of the aircraft to contribute to turn over of an airline. This turn over is supplied by:

fare paying passengers or

fare paying cargo or

a combination of the two.

**ATNS does not supply a service to an airline but ATNS supplies its service to each and every fare paying passenger and/or fare paying kilogram of cargo on board. The airline is merely an intermediary between these fare paying entities and the ATNS.**

Apart from paragraph 4, when an airline can only have so many slots at FACT and it wants to obtain a certain share of the market that airline will have to increase the size of its aircraft in order to achieve its market share.

Last but not least, the larger the size of the aircrafts in ones fleet the less aircraft one needs in order to satisfy the market, the less crews one needs in order to fly those aircraft. Consequently **size pays**.

Of course basing the charges on the all up weight of the aircraft is to the

advantaged of the airlines and they consequently bully ATNS into accepting the all up weight as a basis for their calculations.

**K. Concluding summary.**

The private owner and the flying training establishment suffer the consequences of the fact that the South African authorities never bothered to supply them with the "**suitable alternative**" promised.

The policy and strategy of ATNS towards the private owner and the flying training establishment is discriminatory and a violation of their constitutional rights.

The policy and strategy of ATNS might force the private owner out of aviation and the flying training establishment out of business.

The fact that the SA authorities shied away from their promise to supply a suitable alternative led to the development of a flying training establishment at FACT unmatched anywhere in the country and supplied the aviation industry with pilots of a very high level of competency. In other words the flying establishment at FACT supplied the airline industry with what they need. Many foreign carriers have benefited from this fact as well.

Any unnecessary cost increase will increase the entry level into the industry thereby making it impossible for more people to make flying a career. The greatest victims are our previously "**disadvantaged**" countrymen.

By succumbing to the pressure of the airlines the ATNS has created an anomaly.

**L. In conclusion.**

The implementation date for the ATNS charges to which the private owners and the flying training establishment are objecting is April 1st, 2005.

Adequate argument has been supplied to justify a postponement as far as the private owners and the flying training establishment at FACT are concerned.

AWAC, the Aviation Watch Action committee of Cape Town, and ATNS will through consultation work out an amendment to the proposed charges satisfying them and the ATNS.

**Submission By Cape Aero Club**

(Rocky Romanov, Chairman)

I have given the “club” issue a lot of thought and it is amazing to what extent we as clubs are subsidizing the principle airlines in this country as well as the rest of the world. I know we are not interested in the rest of the world but airlines like Cathay Pacific have many pilots trained at Cape Aero Club.

I had lunch on Sunday with a pilot who trained at Cape Aero Club right up to her Airline Transport License. She was accepted by SAA and within six weeks she was rated on the on the latest high technology Airbus fleet and was flying the international routes. Surely SAA must be laughing all the way to the bank in a situation like this. It would be impossible to know exactly how many pilots this club has trained to date up to this level, but during my time (25 years) at the club I would estimate substantial number. The big point in all this is

that it is the flying clubs like ours that are providing the necessary instructional hours required by an aspiring airline pilot to get the hours to reach an ATP level of expertise. The difference between training a cadet from scratch or converting a fully qualified ATP is almost unimaginable. SAA and the others obviously have not given this much thought. There is no better way to build up steady hours in this game than by doing instruction. It is of vital importance that particularly flying training institutions are not subjected to these radical increases envisaged by ATNS. The five fixed wing training centers in the Cape Town area alone operate in excess of thirty aircraft. These aircraft require fuel, maintenance and many people to run them every day. It would be difficult to even try and estimate how many jobs are created by general aviation around the Cape Town area alone. Also, do ACSA really want to see the demise of general aviation in SA? The huge rentals that they charge in the GA area would surely dent their coffers substantially should we all have to close our doors. The AMO's certainly won't stick around if their business drops off as radically as it will without the GA trade that they enjoy at the moment. Personally, I think standards will drop across the board. Air Traffic Controllers for example will probably lose their edge with simply having to deal with schedules. What about the volunteer section of aviation? The fact that institutions such as the **Red Cross Air Mercy Service** is operated predominantly by well qualified volunteer pilots is very important. The more difficult it becomes to qualify as a pilot the quicker these sections of aviation will fade out. We've already discussed the "under the radar" problem that will develop without a doubt.

Finally, the only way to expose the general public to aviation is through General Aviation. Air shows, club open days as well as bright young pilots sporting their brand new abilities and flying their friends and families. These are the necessary factors which convince these

people to better themselves in aviation. We cannot let this end because of the shortsightedness of a few individuals who have suddenly clicked on a silly idea to reduce their costs.

**Other submissions from members with regards to club operations include:**

1. The increased tariffs have little or no effect on the ATNS fees levied upon commercial carriers, and appears to be calculated to impose practically intolerable charges on light aircraft or certainly has that effect whatever the intention.
2. The total operating cost of one small aircraft (4 seater) is typically between R300 and R500 for a complete local flight, the increased charges of R160 placed upon such an aircraft is totally unreasonable.
3. Typically a single private pilot licence course (“PPL”) costs approximately R50000,00 if done in this 4 seater aircraft. Applying the revised charges could increase this to approximately R60000,00 when the training discount is phased out in 5 years. Consequently, pilot training will be unaffordable.
4. Without pilot training, the livelihood of a many fulltime, professional flight instructors as well as the position of several training club employees are in immediate jeopardy. Further, as it is extremely unlikely that an alternative venue can be found (as may be the case elsewhere in the country) this would effectively bring an end to the ability of instructors to carry on their profession.

5. How can this be appropriate for the provision of future professional airline pilots? What benefit do the members of such clubs and organisations actually derive hereafter? Plans to entice foreign investment in terms of a PPL package for foreign students is no longer an option, as the dramatic increase in cost would no longer be competitive.
6. It is our view that the increased tariffs are unreasonable and unfair. No adequate, opportunity was given to interested parties to be heard. Modern practices of fair public accountability do not allow for legislation to be slipped past an unsuspecting public via a Government Gazette, as was common practice in the past.
7. There has been no consultation with your client base (or certainly with the interested parties to this submission) who have certainly been adversely affected and are being unfairly discriminated against *vis a vis* other interested parties.
8. As regards Flight Safety, the new tariffs actually provide incentive for pilots not to use ATNS services wherever legally possible, which cannot be in the interest of promoting flight safety.
9. The increased charges simply spell disaster for the viability of our clubs and training schools. We will not be able to survive.

[Organisations affected :- Goodhope Flying Club, UCT Flying Association, Cape Aero Club, 43 Air School, Stellenbosch Flying Club, Algoa Flying Club].

## **AIRCRAFT OWNERS, PILOTS AND SAFETY OFFICERS**

### **THE EFFECT ON AIRCRAFT OWNERS**

(Submitted by Christiaan Marais)

Having spent a couple of days on the phone to fellow aircraft owners, the overall response was unanimous, in that everybody is going to go out of their way to avoid controlled airspace and controlled aerodromes. ATNS is a service for aviation safety, and not something that should want to be avoided.

Most owners I spoke to, as far a field as Springbok and Uppington, service their aircraft at AMO's at Cape Town International Airport. They will take their business somewhere else. Another owner from Springbok works in Cape Town during the week and flies to Springbok on weekends. To avoid the accumulating extra costs of flying in and out of Cape Town on a weekly basis, he will then fly into Stellenbosch, in marginal weather, under the TMA, without a flight plan. This is only one example of many others that I heard.

Some of us can not avoid controlled airspace, like private owners (myself included) that are based at Cape Town International and have no where else to go. Due to the nature of my business, I fly to Port Elizabeth and back in my Cessna 210 about once a week. My annual ATNS charges just for the Cape Town PE flights will come to R39,816-40. That is besides the fact that I also fly to George, East London, Durban, Kimberly, Bloemfontein, Uppington, Johannesburg and Nelspruit on a regular basis. These are extra costs that I can't carry and I'll have to scale my business down, and that will affect employment. I also own a Cessna150 that we use for instruction at Cape Town International. We are in desperate need for another

one, and I was thinking of buying, but with these new charges that are also going to affect flight training at Cape Town, buying an aircraft has all of a sudden become not such a good idea.

Aircraft owners are also going to be affected in a major way due the fact that these new ATNS charges are not only going to affect safety and business, whether private or commercial, but aviation in general. And without aircraft, there'll be no flying.

### **GA SAFETY CONCERNS DUE TO INCREASED ATNS CHARGES**

(Report submitted by the Cape Aero Club Flight Safety Committee on behalf of AWAC)

“There are old pilots, there are bold pilots, but there are no old bold pilots”

Unfortunately the world we live in evolve around economics, everybody is out to save a penny. This is also true when it comes to the flying community – we are only human after all.

Cost cutting is a common occurrence in any industry and it has proven to be fatal when it comes to aviation. Many aircraft accidents worldwide can be linked to some form of cost cutting, be it maintenance or training. From a safety perspective we feel that the new ATNS charges will lead to pilots/operators in the general aviation sector creating innovative ways of cost cutting.

We asked a number of general aviation pilots with various levels of experience what they would do on a flight from Cape Town to George while keeping in mind the new ATNS charges. The same answer was given by all those questioned.

“We will fly low level remaining outside the TMA in order to cut costs”

This is one of our major concerns as there are many dangers like controlled flight into terrain (CFIT) associated with low-level flying.



**(Wreckage of an aircraft after a CFIT accident)**

This will also play a role when it comes to smaller charter operators already on a small profit margin deciding to cut costs by encouraging pilots to perform scud running (avoiding clouds in marginal weather) while remaining outside the TMA.



**(Wreckage of an aircraft after scud running resulted in CFIT)**

We also have a concern for those pilots/operators who decide to cut costs by entering the TMA

or controlled airspace deliberately without permission resulting in an increased risk of mid air collisions in the busier centres.



**(Wreckage of an aircraft after a mid air collision)**

Another concern would be pilots/operators in remote areas having their aircraft maintained at the busier centres resorting to creative ways of dealing with minor/major snags on their aircraft in order to cut the costs of flying through controlled airspace.

The above examples might sound far-fetched but yet they happen on a daily basis worldwide. We feel that the new ATNS charges will lead to an increase in the above-mentioned examples within South Africa and will create an UNSAFE CULTURE among South Africans pilots.

### **A Pilot's Opinion**

(Submitted by Ed Gordon – Air Mercy Services)

Although the airlines pay more at the moment, they get preferential treatment from ATC. General Aviation aircraft, even IFR ones, are made to wait for the airlines. This is because the airlines are bigger, consume more fuel and are on a schedule. GA aircraft, particularly VFR ones are often held up for long periods on the ground before take off or outside the zone

- half an hour or more is not uncommon. In addition, VFR aircraft outbound from Cape Town, despite being on flight plans are often kept below the TMA "due to traffic" - mostly airline traffic. Airlines also book most of the peak IFR departure & arrival slots months in advance. Because of the nature of GA, we don't know when to book a slot till much nearer the time and so lose out.

1. GA does not get the same speedy, efficient flow through controlled airspace that the airlines do. We accept this because we are slower and "less important", but we pay less for the service as well. If ATNS and the regulator now decide that we must pay for what we use, then we can demand to get the same service from ATNS as them. We will now be in a position to demand to be allowed to take off on an IFR flight in a "slow" Baron ahead of a 737 and they must wait because we were ready before them. The airlines can now start to extend their approaches (or orbit!) to allow us to land ahead of them from downwind after a flight round the peninsula. We will no longer have to just accept having to slow down or go into the hold over George and wait while the airlines do their approach before us - we can demand to go ahead of them if we get there first and they can slow down or hold. If we have to pay the higher fees, we can demand the same rights as the airlines, which will cost the airlines far more in waiting on the ground and holding in the air than the amount they save with the new fee structure.
2. ATNS plan for GA to pay 35% of their income with the new structure. In fact they won't get this amount for two reasons :

ATNS have apparently admitted that they have problems collecting fees from GA operators (40% don't pay?). This problem will continue with the new

structure, resulting in them losing a large (14%?) part of their revenue.

With the new structure, GA pilots and operators will do whatever they can (legal or otherwise) to avoid paying fees. By avoiding flying in controlled airspace or talking to a controller, they will pay less, and ATNS's revenue from GA will drop.

**These two factors will cause ATNS to fail to recover the 35% of their income. In the short term this will cause a financial crisis at ATNS, and in the longer term, the airlines will end up having to pay the shortfall because GA's "use" of the system will drop below 35%, and ATNS's costs will remain the same.**

3. Despite their statement on the website that the formulas, by dividing by the square root of the weight, makes it fairer to small aircraft, using the square root in fact results in penalising small aircraft, compared to dividing by the actual weight. Somebody needs to understand maths better.
4. Why weren't the GA operators in the Cape consulted before this whole new system went to the regulators. ATNS do know how to get hold of us, even if the head office doesn't. Didn't ATNS CEO Dr Van Vollenhoven undertake to consult us in future when we had the problem of Peak charges in 2001?
5. I accept that JHB International is busy, but are CPT & DBN really that busy? In addition to the flying I do out of CPT - both IFR in a Pilatus PC12 for the Red Cross, and VFR in a small RV6 - I have been flying quite a lot for the Red Cross out of DBN. While there are busier times, I am convinced that with better controlling and improved procedures for light aircraft, particularly VFR, there is much more capacity at both these airports. Besides at the moment if light aircraft do fly at peak times they

are made to wait and so don't hold up the airlines.

6. ATNS say on their website that they are "actively encouraging the use of Ysterplaat as an alternative airport for Cape Town" What are they doing?
7. If the airlines managed to spring this on GA with ATNS, we maybe need to check that they aren't doing the same thing with ACSA and landing fees and we aren't aware of it.

**Other submissions from owners, safety officers and pilots include:**

1. FACT has no alternative airfield to afford safe and secure training
2. ATNS was not transparent and did not consult local parties. Pilot livelihood has been undermined (and may in many cases be removed).
3. The increases discriminates against private pilots because of its method of application.. This leads onto a flight safety issue in that private pilots may postpone instrument recency training.
4. It is a democratic right and freedom of association to be a member of a club and by applying the higher fees the clubs will face closure.
5. Closure or relocation of clubs and training schools will act as a catalyst to trigger a reverse multiplier affect in aviation and will lead to the demise of supporting services such as the AMO's.

6. The pilots are highly motivated and provide 100% support to fully rescind the proposed charges. All and any steps available should be utilised to ensure that the decision is immediately revoked and that we are given a proper opportunity to state our case thereafter before a further decision is taken.
7. The new charges levied for flights effectively discriminate against light aircraft since it forms a major component of their total operating cost.
8. Aircraft owners will find that as a result of the above utilisation of aircraft will drop dramatically leading to uneconomical operations and possible failure of their businesses. The associated “panic selling” of their aircraft will have a severe impact on the market value of their aircraft in a market already savaged by the strong Rand. This could once again lead to a reverse multiplier affect on the associated industries.
9. Private owners utilising their aircraft seriously need instrument facilities and CTI is the only local airport suitably equipped.
10. We are of the opinion that flight safety will be adversely affected by this development. Pilots will now seek to circumvent the air-traffic control system in conditions that dictate otherwise e.g. “scud running”.
11. We are concerned by the impact on the goodwill towards ATNS that has resulted as a direct consequence of the introduction of the new fee structure. The good work of ATNS in trying to promote an image of transparency and constructive involvement

with general aviation can be enhanced by a more constructive and participative approach. **Where a controlling body lacks the support of its client base, it sets the stage for normally responsible individuals to act outside the scope of regulations.**

12. It is our view that possible alternatives to the new charges have not been properly explored. Although discussions might have taken place with other interested parties, the situation is clearly different with regards to Cape Town. Presently the only viable satellite airfield to Cape Town is Stellenbosch, which is unsuitable due to runway length limitations and noise sensitive surroundings. On the other hand, the greater Johannesburg area is served by numerous secondary airports such as Lanseria, Wonderboom, Rand, Grand Central, Krugersdorp, Vereeniging, etc. and is therefore uniquely different to Cape Town. There are other areas with a similar situation like Port Elizabeth for instance. The fact that there was such a high degree of ignorance pertaining to this issue in Cape Town clearly demonstrates that little or no dialogue with local interested parties had been instituted. [Affected organisations are too numerous to mention].

### **AIR CHARTER OPERATORS**

1. The very nature of charter incorporates the collection, drop-off, supply, support and servicing of international and domestic travellers. Consequently Cape based charter operators need to be stationed at FACT.-

2. 'Domino effect'. If charter companies relocate from FACT (assuming this is possible) the supporting industries like catering, maintenance and hangarage will be negatively affected.
3. Cape Town is synonymous with Peninsula scenic flights, whale watching and more. Such flights are priced between R900 to R1250. Tour operators and Hotels place many bookings for early morning or late afternoon / sunset flights. The ATNS new tariffs places a 30% increase to the flight price!
4. The Charter industry is a natural supplier of pilots to the Airlines and as such is subsidising their training. Clearly a larger contribution by the airlines in terms of ATNS charges is justified. We find their position (the airlines) inexplicable and counter productive.
5. The Charter organisations form an critical ingredient in the Air Transport infrastructure of South Africa operating connecting services to the various tourist destinations for instance. (Game lodges etc.) As such their survival is of crucial importance if the airline "Hub" system is to work. Once again one would think that someone in a senior position at the airlines would have the insight to realise this and as such not act irresponsibly as is the case now by trying to force ATNS to implement the new tariffs.
6. The increased tariffs are an absolute deterrent to promoting the light aircraft industry and it is counter productive to promoting Cape tourism. There can be no doubt of its

negative impact on charter livelihood and is patently discriminatory in nature.

[Affected organisations :- Base 4; Cloud 9; Federal Air; Film Air; NAC; Southern Right Air Charter].

## **AIRCRAFT MAINTENANCE ORGANISATIONS (AMO'S)**

### **Impact of proposed ATNS tariff increase on Aircraft Maintenance Organizations located at Cape Town International Airport.**

(Report submitted by Adriaan Loedolff)

A substantial number of Aircraft Maintenance Organizations (AMO's) are located at Cape Town International Airport (CTI). These AMO's provide vital services such as general aircraft maintenance, overhauls of engines and components, repair and calibration of avionics and instruments, aircraft refurbishment and repair, etc to the General Aviation (GA) community in and around Cape Town; and further afield as far as Upington, Beaufort West and George. GA cannot operate efficiently without easy access to these services; neither can these AMO's earn their existence without an adequate GA client base.

The proposed ATNS tariff increase will substantially add to the cost of making use of any of AMO located at CTI, especially for those users based some distance outside Cape Town. This will result in a shrinking customer base which might cause a number of AMO's to close down resulting in heavy job losses as well as a loss of expertise to the broader aviation community.

Most AMO's have expressed their concern about the fact that they were **neither consulted by ATNS nor did they have the opportunity to present their case to the Regulator when the new tariff structure was first discussed.**

The following AMO's support AWAC in their complaint against ATNS:

Cape Aero Services CC

Southern Airframe Repairs CC

Flight Avionics CC

Aircraft Instruments CC

Southern Aero Electrical CC

Aviation Business Centre

FilmAir

Flightcraft Avionics CC

**Further issues affecting AMO's at FACT are:**

1. Any aircraft needing mandatory maintenance inspections and / or minor repair work at a FACT AMO facility will bear increased costs of R300 to R1000.
2. The tariff increase will render FACT AMO's uncompetitive as customers will seek alternate options at other airfields where new charges do not apply (thus cheaper).  
The other airfields are saturated and suffer from noise pollution issues.

3. The increase would have adverse effects on safety standards as it could force cash-strapped operators or owners (who are already struggling) to simply defer the repair of snags rather than incur the higher fees.
4. AMO's at FACT are being prejudiced and discriminated against by these charges in that we cannot compete with other airfield AMO's due to the newly imposed costs.
5. FACT airport has major maintenance operations that serve aircraft from Namibia, Eastern and Western Cape and even further a field on occasion.

## **INSTRUCTORS**

*The increased tariffs proposed by ATNS will destroy the competitive position of the flying clubs based at FACT and ACSA airports and as a result undermine and/or destroy the livelihood of the instructors in their employ.*

### **Loss of Income = Loss of Jobs**

1. A typical training sortie costs in the region of R 700, the sortie will now cost R 850, and this represents an increase of 21%!
2. Sightseeing flights are also affected. The reduction in flight hours flown will have a direct impact on the instructors earning ability.
3. The overheads of the training organisations are absorbed primarily by the total hrs flown by aircraft. Any factor reducing the total number of hours flown has the effect of pushing aircraft rentals upwards, this obviously has the effect of reducing the amount of training undertaken due to the increase in costs. This introduces a upward

spiralling of costs. This will have a devastating effect on instructor's incomes, making it not financially viable to be an instructor.

4. Increased costs will lead to a declining student base. Flight Training Organisations will lose revenue and may actually be put out of business. This means instructors will lose their jobs.
5. If any schools do survive at FACT and other ACSA airports, they will be unable to attract experienced instructors, resulting in poor quality training.
6. A large controlled airfield like FACT is excellent for training pilots, particularly commercial pilots earmarked for the airlines, who will eventually be operating in that same sort of environment. We cannot give the same quality of training at an uncontrolled field.
7. The instructors are not necessarily employed at FACT out of their own choice, but because some were 'dumped' there in the past when what was theirs originally, was taken away by the military without being given an alternative home. The clubs and their employees were moved to the then D F Malan Airport until a "suitable alternative" could be found. This "alternative" was never found or created, perhaps due to the apathy of the authorities. The result is, that the clubs are still based at Cape Town International Airport. The responsibility and or liability to supply the flying clubs with a "suitable alternative" lie with the new structures put in place by Government. With the introduction and enforcement of the new tariffs, ATNS effectively discharges its responsibility and liability to the clubs by destroying their competitive base and in so doing engineering their demise and destroying the livelihood of various others. We cannot regard this, the action on the part of the ATNS, as reasonable and fair.

### Organizations represented

Good Hope Flying Club, UCT Flying Association, Cape Aero Club, 43 Air School, Stellenbosch Flying Club and over a dozen individual instructors and many supporting personnel.

## **TOURISM**

1. **Rates.** The new tariffs have a direct impact on the tourist's budget. The light aircraft (under 5000kg) air charter company cannot absorb the new tariffs and will have no option but to pass this additional cost directly on to the end user, the tourist.
2. **Tours & packages.** The major tour operators promote travel tours up to a year ahead. This is an industry norm and they require the rates in order to publish and circulate their travel brochures worldwide. All existing published rates will now be null and void. Most of today's tours were booked months ago and they are based on collecting the tourists from game lodges and flying them to FACT to make their connecting international flights (which traditionally depart in the early evening). The new tariffs will necessitate soliciting payments for non-budgeted price increases.
3. **Image.** Air travel is finally becoming recognised as an increasingly popular mode of transport in Southern Africa. To stimulate this growth, our rates and services must be competitive when compared to all other means of travel, (as most tourists view road travel and the vast distances in Southern Africa as hazardous and time consuming). Air travel empowers the tourist to spend more time (and money)

exploring and enjoying the wonders of our country. Unnecessary charges unfortunately push the air travel option beyond the average traveller's budget and it ultimately damages the civil aviation industry's growth.

## **RECREATIONAL AND SPORTS FLYING**

(Submitted by the Chairman of SAPFA, Chris Booysen, on behalf of it's 300+ members)

### **PREAMBLE**

As a result of invitations to the ATNS briefing sessions we have just been made aware of the dramatic amendment to the method of calculation of Air Traffic Service Charges. We have now had the ability to review the new charges and are concerned with the effect that the charges will have on our members, general aviation and on safety.

The South African Power Flying Association (SAPFA) is affiliated to the Aero Club of South Africa and represents general aviation pilots and the sports of rally and precision flying and air racing.

Very few general aviation pilots are paid up members of any general aviation organisation and we cannot therefore assume to represent all general aviation pilots. We do however have regular communication with general aviation pilots via the network of flying clubs and other general aviation forums. This submission is made on behalf of our members and the other general aviation pilots with whom we have had contact since your announcement.

The time between your announcement of the new tariffs and the effective date is short and we have therefore not been able to get feedback from all our members, the flying clubs and other forums. The feedback that we have received so far has been unanimous in the rejection of the increases for aircraft over 1200kgs. These increases are so large that they can only be described as unbelievable. We have had contact with enough pilots in general aviation to believe that our submission reflects the feeling of the majority of general aviation pilots.

As a responsible aviation organisation we also promote aviation safety. In the main we were therefore supportive of the previous annual ATS charge on aircraft based on weight as it also enabled us to encourage our members as well as other general aviation pilots to make use of ATNS service to make flying safer. We encouraged pilots to submit flight plans for their flights and to make position reports to ATC as required. We also encouraged pilots to fly along recognised routes rather than direct GPS “Go To” routing. We believe that this would make flying safer for all. We also agree with the user pay concept agree that all users should contribute to the costs of ATNS.

## **CONSULTATION**

On your website, and during the briefings to date, you have indicated that you did consult with various organisations including Aero Club. Unfortunately Aero Club did not consult its membership on the new fees. I am chairman of SAPFA, the affiliated section of Aero Club that represents general aviation. I was only informed by Aero Club that the exemption had been extended to aircraft weighing less than 1200kg. At no time was I informed that the tariffs for general aviation aircraft from 1200kg to 2800kg would be moving from an annual fee to a

weight driven fee. In fact the September 2004 newsletter released by Aero Club (see <http://www.aeroclub.org.za/news/default.asp> ) indicated that Aero Club found the proposal unacceptable and that further negotiation was required.

I have consulted with SAPFA members, flying clubs and individual pilots. Only 1 person claims to have been aware of the new fee structure. A few have indicated that they were aware that there was talk of a change but were still waiting for detail. Nobody is aware of any attempt by ATNS to publicise the new structure prior to the briefing meetings that you have held. These briefings were held far too close to the implementation date to allow proper comments by general aviation pilots at large.

Prior publication is essential for proper consultation. Prior publication is simple to achieve. It can be done by means of:

- a) an insert in the AIC pack published by CAA,
- b) press releases to the aviation magazines,
- c) emails to pilots (as was done to publicise the briefing meetings),
- d) communications with the many flying clubs in the country, or
- e) notices at airfields and airports.

We also note with concern that there are no briefings at the airfields where the general aviation pilots are affected the most. Airfields like PE, EL, and George where there are no alternative airfields to operate from have been ignored completely.

## **THE NEW FEE STRUCTURE AND ITS EFFECTS**

The new ATNS charges have resulted in a dramatic change in the fees for general aviation. The annual fees have been abolished and replaced with a fee per flight. We have the following comments on the new charges:

1. ATNS has decided to use weight as the primary determinant of their charges. There are a large number of other factors that should be taken into account in determining charges e.g. use (commercial or recreational), number of passenger seats or useful payload, preference provided (scheduled or not, IFR or VFR) etc.
2. General aviation is cost sensitive and general aviation pilots will attempt to avoid the ATNS charges. This will lead to unusual flight routings and flight paths. High charges will also lead to aircraft not talking to ATC.

The high charges will instil a reluctance to go on some flights which will lead to a deterioration of skills. In fact a Port Elizabeth based DE flight instructor has already noticed a deterioration in skills levels as a result of less training as a result of the already high costs of operating from an ACSA airfield.

The levy of an area fee for aircraft on a flight plan will result in flying without flight plans. Flight plans result in orderly flights with ATC expecting aircraft at reporting points.

These items are going to compromise safety significantly. Safety is one of the

cornerstones of aviation. Surely we should not be compromising safety through a bad tariff structure.

3. We are led to believe that the new tariff structure is intended to exempt aircraft that are used solely for recreational purposes. The cut off at 1 200kg has not achieved that. There seems to be a perception that aircraft over 1 200kg are all used for commercial purposes. This is not correct. While there is some commercial activity in the 1 200kg to 2 000 kg area this is not large. In fact there is most probably more commercial activity in the below 1 200kg area (flying training) than in the 1 200 to 2 000 kg aircraft. Payload limitations and speed make most aircraft below 2 000 kg not suitable for commercial operations. For example a Cessna C210 is a 6 seater aircraft. But due to its payload it is not possible to fly with 6 people if the aircraft is full of fuel. In fact, if the passengers have luggage it is close to its limits with 4 people on board. While there is some commercial flying with such an aircraft it is likely that almost all the flying in this aircraft will be recreational. I cannot believe that a YAK 18T or a Cessna 172RG would ever be used for commercial purposes.
4. Almost all flying training towards Private Pilot Licenses and Commercial Pilots Licenses is done on light aircraft below 2 800 kg. The beneficiaries of this training are the large commercial charter operations and the airlines. None of the large commercial aviation companies or airlines has any training facilities to train new pilots. We believe that there should be some cross subsidisation from the large commercial airliners to make up for this.

5. Commercial organisations have the ability to pass on costs to their customers. Recreational pilots have to bear the full cost themselves. The new charges make no differentiation between commercial flying and recreational flying.
  
6. The use of weight is discriminatory. Under the old tariff system the discrimination was not great as the increase in fee from the exempt (below 900kg) aircraft to those slightly heavier (up to 2000kg) aircraft was small. Under the new structure the difference between the potential fees between an aircraft weighing 1 199 kg and one weighing 1 201kg is enormous.

As an example of the discrimination brought about by the new structure one should compare a 4 seater Piper Arrow with the equivalent Cessna. The Piper (PA28R180) has a MCM of 1134kg and is exempt. The equivalent Cessna (Cessna 172RG) weighs 1 202kg and is therefore subject to charges. If the Cessna is based at an ACSA airport it will be subject to a per flight cost of R72.82 (2 x aerodrome charges) while the Piper will be exempt. On longer flights where the aircraft would like to fly at a higher altitude the cost for the Cessna would be in the region of R200 per flight.

Another example of how the use of a weight can create a differential is the YAK 18T which weighs 1 400kg. This aircraft is the equivalent (in passenger seats and speed) to a Cessna 172 (under 1200kg). Mooney aircraft are another example. A Mooney M20E weighs 1 168kg while the slightly later model (M20F) is almost identical but weighs 1 243 kg.

7. As mentioned above the differential of the fees between an aircraft less than 1 200kg to one over 1 200kg is much too large. It cannot be fair for one aircraft to pay nothing and then one a few kgs heavier to pay significant amounts on a per flight basis. The cost for an aircraft flying from say Port Elizabeth to Lanseria is in the region of R300 in ATS charges. This at a time where a one way ticket from Port Elizabeth to Johannesburg on one of the low cost airlines can cost as little as R450. This must be an indication that the fees structure is not fair on smaller aircraft.
  
8. While the Johannesburg TMA is congested the other TMAs are far less congested. Is it logical for a general aviation flight to be charged less if he departs from Tempe and delays his climb until he is out from underneath the Bloemfontein TMA? The pilot is in any case going to contact Bloemfontein Approach as his first contact to transmit his airborne time. The service that will be given to that aircraft by ATC in this case will be similar if the aircraft is in the TMA or if he wants to start his climb early and fly through the TMA. Imagine the flight plans that will be submitted - Depart FATP, VFR to 30 miles, then climb to FL95.

Another example of where service by ATC is identical in or under the TMA is the PE TMA. Situated below the PE TMA is the PE Special rules area where aircraft are on the Approach frequency. The same amount of contact will be made between ATC and an aircraft flying below the TMA as in the TMA. Traffic volumes are so low it is unlikely that there will be any more than the initial contact and routing instructions. There seems to be no logic in attempting to keep general aviation out of the majority of the TMAs by means of expensive fees.

9. General aviation aircraft based at George, Port Elizabeth and East London have no alternative airfields to operate from. They are forced to operate from ACSA airfields. There are no airfields in the proximity of these cities except for Uitenhage in the case of Port Elizabeth. Uitenhage has no fuel and no facilities so aircraft would in any case have to visit the Port Elizabeth ACSA airfield. Uitenhage is under threat as the municipality want it closed as they feel it unnecessary so close to Port Elizabeth.

The new charges will reduce general aviation dramatically. Very few people will take their family and friends for a short flight when faced with the aerodrome charges (out and in), added to the already expensive ACSA passenger fees and landing fees.

10. The new charges make no differential for aircraft flying IFR and VFR. Also there is no differential between scheduled flights and other IFR flights. Scheduled flights get preference over IF flights who get preference over VFR flights. General aviation flights are diverted and delayed and made to orbit to give preference to IFR flights.

Commercial flights tend to fly higher and receive service from take-off to landing. General aviation flights fly at a lower level and spend most of their time in uncontrolled airspace with no service from ATC.

It is discriminatory to charge the same fees for the significantly different levels of service.

11. General aviation is charged with the responsibility of introducing aviation to the previously disadvantaged community. The only way that we can introduce aviation to the communities that have not previously had access is via the general aviation community. Significantly higher costs will result in a reduction of general aviation aircraft with the consequent lack of ability to develop the interest in aviation amongst all South Africans. It is interesting to note that our neighbouring countries in Africa have effectively eliminated general aviation through the levy of charges. We do not want that to happen in our country.

There are also a large number of general aviation pilots that donate their time and aircraft to various NGOs free of charge to support charitable projects. Organisations like the Rainbow Airbridge and the Bateleurs do an incredible amount for poverty relief and the environment based purely on the free use of general aviation aircraft. The increased charges could lead to reduced support for these organisations.

General aviation is playing its part in the new South Africa. ATNS should recognise this.

12. No accurate statistics are maintained by any institution on the usage of aircraft, their weight categories and the usage of ATC services. We understand that ATNS has seen massive growth in their communications with general aviation aircraft. We believe that this was the result of the annual fee structure and that the growth was not in the number of flights but more in the number of people now prepared to talk to ATC. We do not want to go back into the dark ages where we have aircraft flying around and

not talking.

13. One of the major reasons for the instituting of the current annual charge was to reduce cost of invoicing and credit control. This principle seems to have been ignored in the new fee structure. In the last negotiations with ATNS it was agreed that the annual fee would dramatically reduce the administration and credit control costs as well as the possibility of uncollected revenue as it was a single annual charge against the owner. It is hard to understand what has changed so dramatically over the past 2 years to make that principle inapplicable.
14. It is accepted in all major countries in the world that recreational aviation is not levied large charges for ATC services and landing fees. In a large number of countries general aviation is actually supported and subsidised by government. We are not adverse to a user pay system but in the case of ATNS the users are not only paying for the services but are also contributing significantly to the State. This can be clearly seen by doing an analysis of the ATNS financial statements published on your website.

## **SUMMARY**

As can be seen from the above the cut off at 1 200 kg causes similar aircraft to have hugely different costs. The jump in costs for an aircraft just over 1 200kg is huge. As we see it the new charges will result in the general aviation pilot unlucky enough to fly an aircraft above 1 200kg no longer submitting flight plans, avoiding talking to ATC and following unusual

routing to avoid TMAs. We believe that this will be detrimental to aviation safety. In addition we see that the costs will result in less general aviation recreational flying, especially at those ACSA airfields where there are no alternatives. We believe that the new fees are not equitable as there are a number of factors that are ignored in the levy of the charges. We also believe that you have not consulted the general aviation sector in the determination of your tariff structure.

## **PROPOSAL**

Aviation does not want very complex calculations of charges. It is therefore impossible to take into account all the factors that should make up the charge.

ATNS has decided to use weight as the primary determinant and a proposal on any other basis will require a complete rework of the basis of calculation. We would therefore propose that the introduction of the new tariffs be delayed until a more equitable solution can be found after proper consultation with general aviation pilots.

Failing this we propose aircraft that are used for recreational purposes which exceeds the 1 200kg limit make a contribution to the costs of ATNS. We therefore propose the reinstatement of the annual fee for aircraft between 1200kg and 2 800 kg. They must then be exempted from the Aerodrome, TMA and Area charges as for the aircraft under 1 200kg. Aircraft under 1 200kg must also be exempted from charges at Johannesburg, Cape Town and Durban.

## **RECREATIONAL - SKYDIVING**

(Citrusdal and Delta 200 Skydiving Club)

The skydiving fraternity at D200 is highly active. Their facility attracts an extraordinarily high volume of foreign skydivers. Whilst the D200 is situated N.E. of CPT Intl, each flight must obtain legal approval from Cape Town Approach to enter the CPT T.M.A. to climb to altitude for each 'drop'. If each entry into the TMA attracts charges, the D200 skydiving industry will close, without question.

## **WARBIRDS**

(Additional points submitted by Ron Weeldon)

One additional point occurs to me, which is that the whole ATNS structure is necessitated by airlines and their operations. If there were no airlines with their high intensity operations and carrying large numbers of people, GA would operate without the need for advanced monitoring as it did before the second world war. Airlines and charter operators make a living from selling aviation services to the public at large, of which ATNS charges is a relatively small element (considering, say, the US\$700,000 a month lease on a 737-800), fuel costs, staffing and the like. A GA pilot is typically a person exercising his right to travel by a means of his choosing and, since he is not deriving his income from the use of an aircraft, he is far less able to pay for the "service" from ATNS. Typically, he will be handing 40% of his income to the State and, in return, he is entitled to enjoy the benefits of the infrastructure he has paid for. In the past, ATC services were provided by the State as part of its overall

responsibility to maintain a reasonable infrastructure - the very handing over of this responsibility to a profit making monopoly enterprise is highly suspect - and it is the State owned national airline, subsidised in its various excesses by taxpayers, and of course the SAAF which are the primary users of the infrastructure. **It HAS to be there to support their operations.**

### **UNIQUENESS OF CAPE TOWN**

1. It is imperative that all parties be aware of and accept the uniqueness of Cape Town International Airport (“FACT”). The ATNS parameters applied to other “hubs” cannot be unilaterally applied to FACT.
2. FACT is geographically positioned between mountains, the sea and an extended peninsula. The lie of the land and the flow of inbound and outbound air traffic does limit additional airfield placement, although two minor airfields do exist at Fisantekraal and Stellenbosch.
3. Access to FACT by road is convenient and quick due to the network of quality main roads. Compare this to the inconvenient road access to Fisantekraal or Stellenbosch airfields. Should we be expected as light aircraft operators to consider using these alternatives to accommodate all our students, our staff and our customers or tourists? It borders on ridiculous, particularly when FACT has just undergone enormous economic expansion and now boasts a modern international arrival and departure

facility, plus an extensive array of service and support related industries within the airport grounds.

4. **Stellenbosch** suffers from noise pollution, which is a major (and emotive) contention for local residents. Any additional traffic will harm local relations further. The airfield runway weight and length carrying ability is very limited. Indeed, Part 135 commercial operations require a runway be 1.3 times the minimum required length as published by the aircraft manufacturer. The inclined runway slope and tight circuit restrict maximum all up weight operations and this has caught many pilots off guard. It is also hazardous by night and such landings require a specific 'local' rating. Stellenbosch airfield lacks almost all the basic facilities required to offer its services as an alternate to FACT (from Jet A1 to Passport / Customs control; from overnight hangars, catering, office suites to quality AMO facilities). It is well known that Border Police are aware of a number of illegal cross border (international) flights that depart and/or arrive via Stellenbosch. Imagine how this will escalate if airfield based operators must pay an ATNS charge to clear customs at FACT for departure and yet another charge when returning from the same cross border trip!
  
5. **Fisantekraal** is privately owned, lacks all the facilities mentioned above and its security is questionable.

## **CONCLUSION**

The main thrust of our argument rests on basically three tenets namely the right to be consulted with, the right to not be discriminated against and the right to practice our professions within a reasonable cost structure. In our collective opinion our rights have been clearly compromised. Where a revenue charging supplier of services and infrastructure acts in the above manner it does not bode well for the future of all.

Document compiled by Paul Van Tellingen on behalf of AWAC from various submissions received.

30 March 2005

# SA Flyer Magazine

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Paul van Tellingen

Dear Paul

Please accept this letter as confirmation that as Editor of SA Flyer Magazine, I have had no notice whatsoever of any change to the existing ATNS tariff changes. Indeed, the first I heard of it was within the last three weeks on the Avcom forum website.

As the continent's best selling aviation magazine – I am at a loss to understand why our publication was not approached during the early discussion phases of tariff change implementation. Neither has ATNS sent out a press release to our magazine specifying the changes.

As an operator of an aircraft weighing 1272 kgs we fall within the new tariff structure and feel that this is discriminatory. I also feel that the new tariff system is flawed in its execution and pays no attention to real-world ATNS usage nor the use of General Aviation aircraft in South Africa. The execution of the new tariffs will have a serious effect on the level of business and private aircraft ownership in South Africa as it has done in other countries, particularly within the SADC.

Yours sincerely

John Miller  
Editor  
SA Flyer Magazine

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Mr P van Tellinghen  
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Email [telfa@iafrica.com](mailto:telfa@iafrica.com)  
Cape Town

29 March 2005

Dear Paul

### **ATNS Fee structure**


I have already given a submission to you in my capacity as chairman of SAPFA. The committee of the Algoa Flying Club have instructed me to write to you on their behalf and on behalf of the 305 members of the Club.

We find ourselves to be in a similar position to the Clubs based at Cape Town except in that most of our training aircraft are exempt under the new structure in that they are below the 1200 kg limit. The club does however own a C172RG which has a MAUW of 1202kgs.

The C172RG will be rendered obsolete under the new tariff structure as it will be liable for Aerodrome fees of R54.50 per flight. It is impossible to see that this aircraft will be used by any of our members as this is a significant portion of the running costs of the aircraft.

We therefore support your approach to ATNS and the regulatory committee.

Yours faithfully



**C J Booyesen**  
Chairman

Some examples for flights from FACT (all excl. VAT):

Tomahawk / C152 local training flight to FAFK	R 27.87	rising to	R 139.37	in 2009
Warrior / C172 on training flight to FASX, FARS, FACT	R 70.86	rising to	R 354.30	in 2009
Cutlass on training IF flight Robben Island	R 49.38	rising to	R 246.91	in 2009
Baron 55 to George (one way)	R 362.54	or	R 72.51	per pax (5)
PC12 to George (one way)	R 483.82	or	R 60.48	per pax (8)
Convair to George (one way)	R 1 109.95	or	R 29.70	per pax (52)
B737-200 to George (one way)	R 1 544.16	or	R 11.88	per pax (130)
B747-400 to George (one way)	R 3 983.94	or	R 10.35	per pax (385)



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#### I was aware of the changes that were coming from ATNS?

Yes	<input type="radio"/>	1%	[ 1 ]
No	<input type="radio"/>	78%	[ 72 ]
I had vaguely heard about it but was unaware of the huge change	<input type="radio"/>	20%	[ 19 ]

**Total Votes : 92**

Sourced from the internet on Wednesday 30 March 2005 at 5.30pm: [www.avcom.co.za](http://www.avcom.co.za)