



***Consultation: Better information about UK aviation***

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The Consumer Council welcomes the opportunity to respond to this consultation.

The Consumer Council welcomes the new duties conveyed upon the Civil Aviation Authority by the Civil Aviation Act. To be able to make informed travel choices consumers need more information than simply the price of their flight; they need to be able to access information about the services and facilities available and information about the environmental performance of their airline and airports.

The Consumer Council has consistently challenged unclear pricing practices, calling on airlines to provide passengers with a clear price from the beginning of the booking process. The Consumer Council welcomes the CAA's commitment to continue to monitor airlines' compliance with the Air Services Regulation and the Consumer Protection (Payment Surcharges) Regulations to ensure continued compliance. The Consumer Council recognises that not all airlines provide clear information on their optional charges from the beginning of the booking process and it believes that this is an area in which the CAA should use its information duties to address this issue.

The Consumer Council believes that the CAA should use its information powers to provide consumers with information concerning scheduling changes. Currently under Regulation (EC) No 261/2004 an airline is not required to provide compensation to passengers if their flight is cancelled more than 2 weeks before they travel. However, if a passenger's flight is cancelled close to the time of travel it can prove inconvenient for the passenger and providing consumers with information concerning incidences of cancellations and schedule changes would help them make informed choices when purchasing flights. It may be useful for the CAA to require airlines to provide information concerning the percentage of flights cancelled on the day of travel and separately, the percentage of flights cancelled prior to the day of travel. This would help passengers make a distinction between the cancellation of flights at short notice due to factors beyond the airline's control and the cancellation of flights due to route withdrawals or scheduling changes.

The Consumer Council agrees with the CAA that certain aspects of airlines' and airports' service that vary can only be observed after use. The Consumer Council therefore considers it important that the CAA uses its information powers to provide information on issues including airline punctuality, onboard legroom, provision of in-flight meals and concerning airports, queuing times, frequency of flight disruption due to severe weather and provision of PRM assistance services. It is also essential that where the CAA uses its information powers to require airlines and airports to provide information to passengers, that the information is provided in a uniform format that allows for straightforward comparison of the information. If uniform presentation of

information is not required of airports and airlines, passengers will be unable to compare the information, therefore diminishing its usefulness.

The Consumer Council welcomes the CAA's proposal to use its new powers to ensure airline and airport websites provide information on key policies and services for passengers with a disability or reduced mobility in comparable formats. The Consumer Council does not have any further categories to add to those identified in paragraph C12.

The Consumer Council agrees that the CAA's punctuality and delay reporting should be extended to cover all airports handling over 1% of total passengers per year. The Consumer Council also agrees that 12 month rolling average performance figures should be used as the basis of any flight reliability metric developed by the CAA as this will provide consumers with an up to date picture of airlines' performances taking account of recent improvements or reductions in reliability.

The Consumer Council agrees that the provision of information should be tailored on the basis of the topic and audience. It is essential that information provided to the general public is easy to understand but contains sufficient detail to enable informed choices. It may be appropriate to provide various levels of information ranging from "at a glance" overviews, through to more complex descriptions of services and environmental performance for those consumers who wish to examine the information available in greater detail.

The Consumer Council believes flight reliability should be presented early in the booking process and reliability should be shown individually for each route. Reliability should not be shown for the airline as a whole as specific routes may be more prone to disruption and where this is the case consumers should be aware of this. It would be beneficial for individual figures to be provided in relation to punctuality, cancellations, instances of denied boarding and incidences of lost or damaged baggage. Compiling these various factors into a single reliability metric would not provide passengers with sufficient information.

The Consumer Council does not believe that there should be a single definition of a "long" delay. Rather, the threshold could be set as a certain percentage of the total flight time and the length of time before a flight is considered to be subject to a long delay would therefore vary from flight to flight. In developing a reliability metric for mishandled baggage the CAA should take into account incidences of delayed, lost and damaged baggage as well as the average length of time of baggage delays.

For more information or to arrange a meeting to discuss any of the issues outlined in this paper please contact Scott Kennerley, Head of Policy (Transport), on 028 9067 2488 or [skennerley@consumercouncil.org.uk](mailto:skennerley@consumercouncil.org.uk).



**The Consumer Council**

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