



BUSINESS AIRCRAFT OPERATORS ASSOCIATION

Ref. No. BAOA/AERA/01/2021-22

July 14, 2021

Director (P&S, Tariff)
Airports Economic Regulatory Authority of India
AERA Building, Administrative Complex,
New Delhi -110003.

Subject: - Comments: AERA's Consultation Paper (CP) No. 08/2021-22

Sir,

BAOA participated in the stakeholders web discussions held on 30th June 2021 on the subject matter. We have the following comments to offer on the CP: -

- a) Since AERA is undertaking independent airport specific study on aeronautical assets and the associate charges, it is requested that aeronautical assets for each square foot area, and the applicable aeronautical charges for its by aircraft operators, be unambiguously stated in every AERA order.
- b) As a 'follow up' of the above point, 'housing charges', that affect the small aircraft industry the most, be well defined in terms of specific aeronautical assets available for the purpose on the airport. In the absence of each area specific charges, the possibility of airport operators interpreting the applicability of such charges in their own way, and to own advantage, has been taking place.
- c) In line with GH policy being followed by AAI, the royalty on GH charges be restricted to 15% or the permissible FROR on each public airport. Further, due to greater attention now required to be given to GH services, being important from safety/security point of view, at public airports, these charges should be decided on 'cost-plus' basis and, not by 'soft touch approach', as has been happening hitherto.

Thanking You

Yours faithfully

For **Business Aircraft Operators Association**

Gp. Capt. Rajesh K. Bali (retd.)

Managing Director