

## BUSINESS AIRCRAFT OPERATORS ASSOCIATION

Ref. No. BAOA/AERA/03/2017-18

July 10, 2017

To.

Secretary,

Airports Economic Regulatory Authority of India,

AERA Building,

Administrative Complex,

Safdarjung Airport

New Delhi - 110 003

Subject:- Comments on AERA Consultation Paper 07/2017-18 & 08/2017-18

Madam,

Please refer your Consultation Papers 07 & 08 of 2017-18

Our comments are as follows:-

- (i) As per para 2 of AERA Act, Ground Handling (GH) Services are aeronautical services at a public airport. The tariff plan proposed by AERA vide Consultation Paper doesn't include GH charges for various services provided at these two airports, as listed out in AIC 3/2010.
- (ii) As per para 2 of AERA Act, maintenance hangars, provided for undertaking essential line/base maintenance services to ensure continuous airworthiness of aircraft to undertake safe flying operation, are aeronautical services at an airport. Therefore, rental charges for leasing these hangars to aircraft operators should have been included in the tariff plan.
- (iii) The UDF charges should be linked to specific improvement in facilities for the passengers at these public airports. Otherwise, these would remain charges levied without any stated targets for improving facilities for the passengers.

Thanking you

For Business Aircraft Operators Association

Gp. Captain R.K. Bali (retd.)

Managing Director