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To: Capt. Kapil Chaudhary (Retd)  
Secretary, AERA  
AERA Building, Administrative Complex,  
Safdarjung Airport, New Delhi -110003

Date: 03/04/2013

Dear Madam,

**Subject: Comments on Annual Tariff proposal for third, fourth and fifth year of the first control period submitted by IOSL for ITP services at Bangalore Airport.**

This is with reference to your letter D.O. No. AERA/20010/MYTP-IOSL/ITP/BIAL/2011-12/3734 dated 21/03/2013.

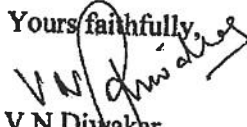
We have the following points to submit for your kind consideration while finalizing the MYTP of IOSL for ITP services provided by them at Bangalore Airport.

1. It will be very difficult for any fuel supplier to collect ITP charges with retrospective effect as these are back to back charges collected from Airline customers. Hence it is requested that sufficient time is given to fuel suppliers (at least 60 days) for these new rates to come into effect for making necessary arrangements with airlines for collection of ITP charges.
2. As volumes at Bangalore Airport are likely to increase, this would give a benefit to the ITP service provider in terms of better utilization of resources and therefore economies of scale will come in. It is requested that a suitable formula be incorporated which may take this into consideration and also this may be monitored by AERA from time to time based on documentation to be submitted by ITP provider.
3. It may also be incorporated suitably in the order that if there is any delay of intimation to the fuel supplier by ITP service provider for increased charges for any reasons whatsoever, then such charges shall not be payable by the fuel supplier on behalf of the airlines as they cannot be collected from the airlines customers.

We request you to kindly consider the above while determining the new rates. We would be pleased to further elaborate the details of our above suggestions and kindly request you to give us an opportunity to present our view and explain the details.

Thanking you,

Yours faithfully,

  
V N Diwakar

Chief Executive Officer

Shell MRPL Aviation Fuel and Services Ltd