



BUSINESS AIRCRAFT OPERATORS ASSOCIATION

Ref. No. BAOA/AERA/02/2017-18

May 08, 2017

To,

Secretary,
Airports Economic Regulatory Authority of India,
AERA Building,
Administrative Complex,
Safdarjung Airport
New Delhi – 110 003

भारतीय विमानपत्तन आर्थिक विनियामक प्राधिकरण
साफदरजंग एयरपोर्ट, नई दिल्ली-110003

प्राप्त
आयची नं०: 7062
तारीख: 09/05/17

Subject:- Comments on AERA Consultation Paper 02/2017-18 in r/o BWFS

Dear Sir/Madam,

Our comments are as follows:-

Para 5.2 of CP – 02/2017-18

- Data to be considered by AERA for fixing GH charges for NSOP/GA aircraft should be specific to type of operations undertaken. Presently, AERA's approach is aligned to only Schedule airlines operations.
- CP doesn't give factual information on the existing 'concessionaires' at DIAL for providing GH services (Bird Execujet Airport Services Pvt. Ltd. & Indamer Mjets Airport Services Pvt. Ltd.). The 'User Agreements' in r/o NSOP are not 'in effect' 'user agreements'. The GH charges decided, hitherto, without approval of AERA, are being levied on NSOP operators.
- The two concessionaires for GH services to NSOP at DIAL are operating under monopolistic situation and cartelization is very much there.
- Code 'A', which comprise aircraft under 15 M wing span, have been deleted. Code 'A' includes majority of NSOP aircraft.
- GH charges start with Code 'B' (Wing span 15 to 24 M) and, charges of Code 'B' aircraft are higher than larger code 'C' aircraft. (Please see attached AAI note on Classification of the aircraft)



Rohit Kapur
President

Pradeep Agarwal
Vice President

Gp. Capt. Rajesh K Bali (Retd.)
Managing Director

Mr. Harsh Vardhan Sharma
Treasurer

- As per Annexure I pg2, BWFS charges are under 3 head viz. Terminal Handling, Ramp Handling & Total Handling (Terminal + Ramp). At Annexure II, BWFS has defined the services provided under each category of handling which are as follows:-
 - **Pax Handling includes services inside the airport terminal such as:**
 - Providing check-in counter services for the passengers departing on the customer airlines.
 - Providing gate arrival and departure services. The agents are required to meet a flight on arrival as well as provide departure services including boarding passengers and closing the flight.
 - Staffing the transfer counters, customer service counters and airline lounges.
 - **Ramp Handling includes services on ramp or apron such as:**
 - Baggage Handling, Loading / unloading of baggage
 - Marshalling to Aircraft
 - Parking
 - Interior / Exterior Cleaning of Aircraft.
 - Moving of aircraft / Push Back Services.
 - Toilet services.
 - Water Services
 - Provision of Air conditioning Service's (when on ground).
 - Provision of Air start units (for starting engines).
 - Ramp to Flight Deck Communication.
 - Provision of Ground power Services (so that engines need not be running to provide aircraft power on the ground).
 - Passenger stairs. Wheelchair lifts, if required.
 - Passenger and crew transport between aircraft and passenger terminals
 - Load Control, Communications and Flight Operations.
- As of now NSOPs are paying Total handling charges. In spite of the fact that total Handling charges include all the above services, BWFS is charging additionally for
 - Interior / Exterior Cleaning of Aircraft.
 - Moving of aircraft / Push Back Services.
 - Toilet services.
 - Water Services.
 - Provision of Air conditioning Service's (when on ground).
 - Provision of Air start units (for starting engines).
 - Ramp to Flight Deck Communication.
 - Provision of Ground power Services (so that engines need not be running to provide aircraft power on the ground).



In view of the above, following is requested for NSOP:-

- 1) AERA to immediately adopt separate approach for fixing GH charges for NSOP. It should be based on size of the aircraft (as per classification codes) and the actual GH services used by NSOP aircraft.
- 2) There should be no additional charges, on account of royalty/revenue share, above the GH charges fixed by AERA.
- 3) Option to use and pay for only the required services should be ensured while fixing of GH charges for NSOP by AERA.
- 4) Vehicle parking fee at DIAL for NSOP employees be at par with monthly charges levied for employees of scheduled airlines.

Thanking you

For Business Aircraft Operators Association


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

Enclosed:- Annex I (AAI note on Classification of the aircraft)

CHAPTER 2: USING ICAO AERODROME REFERENCE CODE TO SPECIFY STANDARDS

2.1 Aerodrome reference code

2.1.1 Airports Authority of India has adopted the International Civil Aviation Organisation (ICAO) methodology for using a code system, known as the Aerodrome Reference Code, to specify the standards for individual aerodrome facilities which are suitable for use by aeroplanes within a range of performances and sizes. The Code is composed of two elements: element 1 is a number related to the aeroplane reference field length; and element 2 is a letter related to the aeroplane wing span and outer main gear wheel span. A particular specification is related to the more appropriate of the two elements of the Code or to an appropriate combination of the two Code elements. The Code letter or number within an element selected for design purposes is related to the critical aeroplane characteristics for which the facility is provided. There could be more than one critical aeroplane, as the critical aeroplane for a particular facility, such as a runway, may not be the critical aeroplane for another facility, such as the taxiway.

2.1.2 The Code number for element 1 shall be determined from column 1 of the table below. The Code number corresponding to the highest value of the aeroplane reference field lengths for which the runway is intended is to be selected.

Note: The determination of the aeroplane reference length is solely for the selection of a Code number and must not be confused with runway length requirements, which are influenced by other factors, such as wind, temperature, elevation, slope, etc.

2.1.3 The Code letter for element 2 shall be determined from column 3 of the Table 2-1 below. The Code letter, which corresponds to the greatest wingspan, or the greatest outer main gear wheel span, whichever gives the more demanding Code letter of the aeroplanes for which the facility is intended is to be selected.



Table 2-1: Aerodrome Reference Code

Aerodrome Reference Code				
Code element 1			Code element 2	
Code number	Aeroplane reference field length	Code letter	Wing span	Outer main gear wheel span [@]
1	Less than 800 m	A	Up to but not including 15 m	Up to but not including 4.5 m
2	800 m up to but not including 1200 m	B	15 m up to but not including 24 m	4.5 m up to but not including 6 m
3	1200 m up to but not including 1800 m	C	24 m up to but not including 36 m	6 m up to but not including 9 m
4	1800 m and over	D	36 m up to but not including 52 m	9 m up to but not including 14 m
		E	52 m up to but not including 65 m	9 m up to but not including 14 m
		F	65 m up to but not including 80 m	14 m up to but not including 16 m

[@] distance between the outside edges of the main gear wheel

2.2 Aerodrome Reference Codes and Aeroplane Characteristics

2.2.1 A list of representative aeroplanes chosen to provide an example of each possible aerodrome reference code number and letter combination is shown in Table 2-2.

2.2.2 For a particular aeroplane the table also provides data on the aeroplane reference field length (ARFL), wingspan and outer main gear wheel span used in determining the aerodrome reference code. The aeroplane data provided for planning purposes is indicative only. Exact values of performance characteristics of a particular aeroplane should be obtained from information published by the aeroplane manufacturer.



Table 2-2: Aerodrome reference codes and aeroplane characteristics

AEROPLANE CHARACTERISTICS							
AEROPLANE TYPE	REF CODE	ARFL (m)	Wing-span (m)	OMGWS (m)	Length (m)	MTOW (Kg)	TP (kPa)
DHC2 Beaver	1A	381	14.6	3.3	10.3	2490	240
Beechcraft :							
58 (Baron)	1A	401	11.5	3.1	9.1	2449	392
100	1A	628	14.0	4.0	12.2	5352	-
Cessna :							
172	1A	272	10.9	2.7	8.2	1066	-
206	1A	274	10.9	2.6	8.6	1639	-
310	1A	518	11.3	3.7	9.7	2359	414
404	1A	721	14.1	4.3	12.1	3810	490
Beechcraft 200	1B	592	16.6	5.6	13.3	5670	735
Cessna :							
208A (Caravan)	1B	296	15.9	3.7	11.5	3310	-
402C	1B	669	13.45	5.6	11.1	3107	490
441	1B	544	15.1	4.6	11.9	4468	665
DHC 6 Twin Otter	1B	695	19.8	4.1	15.8	5670	220
Dornier 228-200	1B	525	17.0	3.6	16.6	5700	-
DHC-7	1C	689	28.4	7.8	24.6	19505	620
DHC-5E	1D	290	29.3	10.2	24.1	22316	-
Lear Jet 28/29	2A	912	13.4	2.5	14.5	6804	793
Beechcraft 1900	2B	1098	16.6	5.8	17.6	7530	-
Embraer EMB 110	2B	1199	15.3	4.9	15.1	5670	586
ATR 42-200	2C	1010	24.6	4.9	22.7	16150	728
Cessna 550	2C	912	15.8	6.0	14.4	6033	700



DHC-8							
100	2C	948	25.9	8.5	22.3	15650	805
300	2C	1122	27.4	8.5	25.7	18642	805
Lear Jet 55	3A	1292	13.4	2.5	16.8	9298	-
Cessna 650	3B	1581	16.3	3.6	16.9	9979	1036
Dassault-Breguet: Falcon 900	3B	1515	19.3	5.3	20.2	20640	1300
Embraer EMB 145	3B	1500	20	4.8	29.9	19200	-
Airbus A300 B2	3D	1676	44.8	10.9	53.6	142000	1241
Airbus A320-200	4C	2058	33.9	8.7	37.6	72000	1360
Boeing:							
B737-200	4C	2295	28.4	6.4	30.6	52390	1145
B737-300	4C	2749	28.9	6.4	30.5	61230	1344
B737-400	4C	2499	28.9	6.4	36.5	63083	1400
B737-800	4C	2256	35.8	6.4	39.5	70535	-
McDonnell Douglas:							
DC9-30	4C	2134	28.5	6.0	37.8	48988	-
DC9-80/MD80	4C	2553	32.9	6.2	45.1	72575	1390
Airbus:							
A300-600	4D	2332	44.8	10.9	54.1	165000	1260
A310-200	4D	1845	43.9	10.9	46.7	132000	1080
Boeing:							
B707-300	4D	3088	44.4	7.9	46.6	151315	1240
B757-200	4D	2057	38.6	8.7	47.3	108860	1172
B767-200ER	4D	2499	47.6	10.8	48.5	156500	1310
B767-300ER	4D	2743	47.6	10.8	54.9	172365	1310
McDonnell Douglas:							
DC8-63	4D	3179	45.2	7.6	57.1	158757	1365
DC10-30	4D	3170	50.4	12.6	55.4	251744	1276

