Ref. No. BAOA/AERA/05/2022-23 November 21, 2022

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

Subject: - Comments on AERA's Consultation Paper (CP) 11/2022-23

Sir.

Please refer AERA's CP-11/2022-23, regarding the Ground Handling (GH) for BWFSIPL at Cochin International Airport, Cochin

We offer the following comments: -

- a) The tariff rates of these aeronautical services, applicable to NSOP/GA flights, proposed in the CP are too high and not commensurate with similar rates proposed earlier for itemwise GH services at Delhi, supposedly by the same ISP, with due approval of DIAL/AERA in March 2019. As already brought out in our letter Ref. No. BAOA/AERA/04/2022-12 dated 17 November 2022, there is a need to link the GH services tariff for these, yet-to-be-regulated semi-skilled/skilled jobs, with the labour rates promulgated separately for each state on yearly basis, based on WPI. For example, the 'aircraft marshalling' has been proposed at Rs. 2500/- for domestic flights in Annex III, sl.no. 9 in the draft tariff order for cochin. This is six times more than the similar charges at DIAL in March 2019. This should match with increase in skilled labour charges issued by Delhi Govt. in the years 2019 & 2022. The aircraft marshaling was being charged at Rs. 400 by the same ISP in March 2019 at Delhi.
- b) It is submitted that all the services listed in Schedule I & II of the MoCA's GH policy, needs to rationalised and made reasonable/affordable for NSOP/GA category of operators, using smaller aircraft, for pan India movements and, depending on airport operators or concessionaires (ISPs) for GH services. While adopting 'soft touch' approach for proposing tariffs for these, unlicensed, GH services, the year-on-year increase should be linked to the prevailing labour rates for semi-skilled / skilled workers being employed to do these jobs at the public airports.
- c) The itemised-wised GH services rates at Delhi, in Mar 2019, be treated as a benchmark for proposing tariff at all other public airports in India due to labour rates in Delhi being the highest.



In view of the above submissions, we request 'the Authority' to review and reissue all the itemised GH charges being proposed at Cochin, as well as at other public airports across India and, rationalized them as per the attached charges issued by Delhi in March 2019. This would go a long way to promote the growth of the small aircraft industry in India and ensure affordable last-mile connectivity on a sustainable basis.

Yours faithfully

For Business Aircraft Operators Association

Gp Capt Rajesh K. Bali (retd.)

Managing Director

Copy: - Chairperson, AERA

Enclosed: - Extract of Marshaling charges in 2019 and in AERA's CP-11/2022-23

From: Anurag Srivastava [mailto:aus@bird.in]

Sent: 16 March 2019 15:42

To: Cc:

Subject: RE: Request for your kind permission for Landing/Takeoff of our aircraft VT BMD

Dear Sir,

Please find rate list published as per DIAL's approval for your kind perusal. You may choose to take itemised services or comprehensive ground handling.

The landing and parking charges shall be advised by team. These charges are to be paid directly to DIAL.

Regards,

Anurag Srivastava Chief Executive Officer & Accountable Manager

Bird ExecuJet Airport Services Private Limited

Tel: +91 11 2567 1840 Mobile: +91 9910039727 Fax: +91 11 2567 4057 www.execujet.com





FBO | MAINTENANCE | CONCIERGE SERVICES

SCHEDULE I

SCOPE OF SERVICES

- The Companywill operate, manage, maintainthe T1D Reserve & GA Lounge and provision of Meet & Greet and Ground Handling services etc. as has been set out under Schedule-II
- 2. The Companywill further operate, manage and maintain the TIC VIP Arrival Lounge wherein the Companyshall provide Catering Services as has been more elaborately set out under Schedule-II
- 3. The GA flight services shall be carried out by the Concessionaire from T1 as well as T3.

SCHEDULE-II

LIST OF SERVICES AND RATES

The services shall be provided by the Companyto the Operators/Users.

COMPREHENSIVE TURNAROUND HANDLING

As a part of the comprehensive handling the Company will provide:-

- (a) Pre flight documentation / intimation to agencies, aircraft marshaling, chocks, staff for monitoring the arrival and departure.
- (b) Adequate staff for passenger and crew facilitation
- (c) Baggage handling
- (d) Issuance of boarding cards and baggage tags
- (e) CIQ Services (Customs, Immigration and Quarantine information) assistance for the passengers and crew.
- (f) Toilet & Water services on request only
- (g) Liaise with all regulatory authorities
- (h) Liaise for settlement of third party payments, e.g. Landing & Parking, RNFC/TNLC charges, Security charges, Catering Charges& Fuel.
- (i) Met folder & filing of fight plan
- One pushback included in the turnaround rate, tow bar to be provided by the Carrier/Operator
- (k) Lounge Services for passengers
- (1) Cars/coach for transportation for the passengers and crew within the airport.

NOTE-

Services not mentioned above will be additional as per itemized rates mentioned in the table below

All third party charges such as Landing, Parking, RNFC, TNLC and any other Government charges are to be cleared by operator unless otherwise specified by the Operator to extend credit facility against security deposit.

Service tax would be charged on all the bills as per the prevailing rates.

RATES FOR THE SERVICES

| S.No. | SERVICE | METRIC | RATES IN INR | | | |
|-------|--|-------------------|--------------|---------------|--|--|
| | | | DOMESTIC | INTERNATIONAL | | |
| 1 | GH CHARGES BASED ON MTOW IN KGS | PER TURNAROUND | | | | |
| Α | Upto 2999 | | ₹12,000.00 | ₹22,000.00 | | |
| В | 3000 to 7999 | 1 | ₹16,800.00 | ₹25,000.00 | | |
| С | 8000 to 10999 | 1 | ₹19,200.00 | ₹35,000.00 | | |
| D | 11000 to 14999 | 1 | ₹26,400.00 | ₹45,000.00 | | |
| E | 15000 to 17999 | 1 | ₹28,000.00 | ₹52,800.00 | | |
| F | 18000 to 24999 | 1 | ₹31,200.00 | ₹57,600.00 | | |
| G | 25000 to 35999 | 1 | ₹33,600.00 | ₹67,200.00 | | |
| Н | 36000 to 59999 | | ₹36,000.00 | ₹1,41,600.00 | | |
| I. | 60000 to 99999 |] | ₹40,000.00 | ₹1,53,600.00 | | |
| J | 1000000 > | | ₹45,000.00 | ₹1,98,360.00 | | |
| | ITEMIZED ADHOC SERVICES | | | | | |
| 2 | BAGGAGE HANDLING | Per Turnaround | ₹3,000.00 | ₹5,000.00 | | |
| 3 | PASSENGER SERVICES | Per Turnaround | ₹2,000.00 | ₹3,000.00 | | |
| 4 | PORTER SERVICES | Per Passenger | ₹ 350.00 | ₹ 500.00 | | |
| 5 | LOUNGE CHARGES | Per flight | ₹4,000.00 | ₹4,000.00 | | |
| 6 | *FERRY SERVICES | per trip | ₹1,500.00 | ₹2,000.00 | | |
| 7 | VALET PARKING | Per hour | ₹ 300.00 | ₹ 300.00 | | |
| 8 | BUSINESS CENTRE | Per hour | ₹4,000.00 | ₹4,000.00 | | |
| 9 | CONFERENCE / MEETING ROOM | Per hour | ₹7,500.00 | ₹7,500.00 | | |
| 10 | CREW ROOM DAY USE | Per Day | ₹7,500.00 | ₹7,500.00 | | |
| 11 | INTERNET SERVICES | Per hour | ₹200.00 | ₹200.00 | | |
| 12 | RESERVATIONS FOR TRANSPORTATION(LIMO/TAXI) | Per Reservation | ₹1,500.00 | ₹1,500.00 | | |
| 13 | HOTEL RESERVATION | Per Reservation | ₹1,500.00 | ₹1,500.00 | | |
| 14 | CUSTOMS & IMMIGRATION CHARGES | | ₹1,000.00 | ₹1,000.00 | | |
| 15 | ASSISTANCE FOR VISA ISSUE | Per Passenger | ₹1,000.00 | ₹1,000.00 | | |
| 16 | GPU | Per hour | ₹7,200.00 | ₹7,200.00 | | |
| 17 | ACU | Per hour | ₹7,200.00 | ₹7,200.00 | | |
| 18 | FORK LIFT | Per hour | ₹4,000.00 | ₹4,000.00 | | |
| 19 | ASU | Per Start | ₹4,000.00 | ₹4,000.00 | | |
| 20 | MARSHALLING | Per | ₹400.00 | ₹400.00 | | |

| | | flight/turnaround | | |
|----|---------------------------------|--------------------------|------------|------------|
| 21 | LOAD CONTROL & COMMUNICATIONS | Per flight/turnaround | ₹500.00 | ₹ 500.00 |
| 22 | FLIGHT OPERATIONS | Per flight/turnaround | ₹2,500.00 | ₹2,500.00 |
| 23 | AIRCRAFT CLEANING | Per flight/turnaround | ₹5,000.00 | ₹ 5,000.00 |
| 24 | TOILET SERVICE | Per flight/turnaround | ₹4,500.00 | ₹4,500.00 |
| 25 | WATER SERVICE | Per flight/turnaround | ₹5,000.00 | ₹ 5,000.00 |
| 26 | ADDITIONAL RAMP LAOR ASSISTANCE | Per hour ₹1,000. | | ₹1,000.00 |
| 27 | PASSENGER STEPS/STAIRS | Per flight/turnaround | ₹5,000.00 | ₹ 5,000.00 |
| 28 | CONVEYER BELT(BFL/UDL/MDL) | Per flight/turnaround | ₹ 5,000.00 | ₹5,000.00 |
| 29 | CONTAINER DOLLIES | Per Dolly | ₹600.00 | ₹ 600.00 |
| 30 | PALLET DOLLIES | Per Dolly | ₹850.00 | ₹850.00 |
| 31 | FACILITATION OF FUELLING | Per flight/turnaround | ₹3,500.00 | ₹ 5,000.00 |
| 32 | (INCLUDING LOADING/UNLOADING) | | ₹ 3,500.00 | ₹ 3,500.00 |
| 33 | LINEN SERVICES | Per flight/turnaround | ₹1,000.00 | ₹2,000.00 |
| 34 | NITROGEN REPLENISHMENT | Per flight/turnaround | ₹4,000.00 | ₹4,000.00 |
| 35 | OXYGEN REPLENISHMENT | Per flight/turnaround | ₹4,000.00 | ₹4,000.00 |
| 36 | TIRE CHECK & REFILL | Per flight/turnaround | ₹ 3,500.00 | ₹3,500.00 |
| 37 | AIRCRAFT TOWING | | | |
| Α | < 5 T (tons) | Per movement | ₹7,500.00 | ₹7,500.00 |
| В | 5T To 10T | Per movement | ₹7,500.00 | ₹7,500.00 |
| С | 11T - 50T | Per movement | ₹11,000.00 | ₹11,000.00 |
| D | 51T-90T | Per movement | ₹11,000.00 | ₹11,000.00 |
| 38 | PUSHBACK | | | |
| Α | 1T To 5 T (tons) | Per movement | ₹5,500.00 | ₹ 5,500.00 |
| В | 5T To 10T | Per movement | ₹ 7,500.00 | ₹ 7,500.00 |
| С | 10T - 35T | Per movement | ₹9,500.00 | ₹9,500.00 |
| D | 35T- 50T | Per movement | ₹10,000.00 | ₹10,000.00 |
| E | 50T-90T | Per movement | ₹11,000.00 | ₹11,000.00 |

| *NOTE-THE RATES ARE SUBJECT TO CHANGE AT SOLE DISCRETION OF DIAL | | |
|--|--|--|

SCHEDULE III

Lounges' details and location

| Sr. No. | LOCATION |
|---------|---------------------------------------|
| 1 | Terminal 1D - General Aviation Lounge |
| 2 | Terminal 1C - VIP Arrival Lounge |

APPENDIX

· For smooth handling, kindly forward the following information:

| Aircraft Type | Aircraft Registration | MTOW | Name of the Operator | Remarks |
|---------------|--------------------------|------|-------------------------|---------|
| | | | | |

Aircraft Operator :
Aircraft Type :
Aircraft Redg :
MTOW :
DGCA Permit :

Flight Routing : NON Schedule

No of Passenger :

Date of flight : will intimate

Fuel Authorization : Catering : Crew Details :

Passenger Details for inbound/outbound as well:

Services required