

14th September, 2022

To

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

Subject: - Reply to observations made by Stakeholders on the Consultation Paper No. 09/2022-23 dated 17th August 2022 for determination of tariff for Ground Handling Services at Chhatrapati Shivaji Maharaj International Airport, Mumbai, for 3rd control period for Bird Worldwide Flight Services Mumbai Private Limited (BWFS)

Dear Sir,

We are in receipt of the observations noted by three stakeholders which are

- A. BCBA,
- B. BAOA and
- C. Spice Jet

on the CP issued by the Authority on the captioned subject. Accordingly, we have prepared our response (stakeholder wise) on the observations / suggestions made by each of the above stakeholders.

A. Response on the observations made by BCBA

We appreciate the efforts made by BCBA in compilation of these observations. However, we are neither the concessionaire for provision of these services nor a regulatory body governing such processes and procedures. Therefore, we request BCBA to raise these observations at appropriate forum/ with regulatory bodies.

B. Response on the observations made by BAOA

We appreciate the efforts made by BAOA in compilation of these observations. However, we are neither the concessionaire at CSMIA, Mumbai for provision of services to GA Aircrafts nor a regulatory body governing such processes and procedures. Therefore, we request BAOA to raise these observations at appropriate forum/ with regulatory bodies.

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C. Response on the observations made by SpiceJet, Delhi

1. Review of Tendering Process:

This is a Global Practice applied by the regulatory bodies in India. We need to follow the Guidelines and Instructions prescribed by these regulatory bodies.

Therefore, SpiceJet should raise this observation with appropriate forum/regulatory bodies.

2. Deferment of Capital Expenditure- Regulatory Asset Base:

We submit as under the followings:

- a) BWFS is required to induct ground handling equipment that are acceptable to its customer airlines which are audited in detail by these customers before signing SGHA.
- b) BWFS is committed to provide world class ground handling services, to meet service levels expected by the airlines and the airport operator for better passenger service experience.
- c) In addition, there are regulatory requirements, in relation to equipment, which every ground handling entity has to follow.

Hence, BWFS cannot compromise on safety, security, efficiency and continuity of its operations and service delivery. BWFS is mature enough to understand that every additional spend will impact its costs. Therefore, all such decisions are taken with a balanced approach.

3. Abolishment of Royalty Charges/ Concession fee:

Here again the observations made by SpiceJet Ltd. is nowhere close to reality on ground. It is more than 15 years that the Airports Authority of India (AAI) is continuously privatizing Indian airports. All these Airport Concessions carry revenue share. Such private appointees (as Airport Operator for a defined concession period), further issue concessions on the basic parameters of AAI. As a result, ground handling concessions also attract concession fees. This method is prevalent at all the airports in India, be it under AAI or a concessioned Airport Operator. The revenues earned by airport operators are reviewed by AERA to ascertain that the airport charges are meeting AERA guidelines.

Therefore, concession fees paid by airlines to a ground handling agency is revenue of the airport operator, contributing in lowering of other airport charges, paid by the airlines to the airport operator. In a hypothetical situation if the concession fees is nil, the airport charges will be higher than the airport charges payable by the airlines in the other situation where concession fees is applied on ground handling charges.

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In nutshell, the royalty on the Ground Handling Services is considered as Aero Revenue for the Airport Operator and hence it directly helps to reduce other Aero Charges which the airport operator recovers from the airlines.

We have tried giving reasons on the observations made by SpiceJet. However, Spicejet should raise this observation at appropriate forum/ with appropriate regulatory bodies.

4. Operational Expenditure- Drastic Cost cutting:

We feel that the observations made by SpiceJet Ltd are very generic in nature, lacks any substance and indicates that observer is unsure and unaware of the facts/ground realities.

Please note that we are a ground handling company of proven track record. We are providing ground handling services at major airports in India from approximately 15 years and have sufficient control over our operational expenditure.

We also want to highlight that ground handling services cannot be provided without incurring substantial investments which contribute in the total charges. Ground handling services are provided by a team of trained and qualified staff under sufficient supervisions, followed globally.

Regarding salary of the staff, please note that we pay our staff according to the “minimum wages” published by the regulator twice a year. There is no scope of material savings in the per head salary cost without compromising on quality and safety aspects of the total service package.

The observation made by SpiceJet Ltd. on Administrative & General Cost, Utility & outsourcing costs and Repair & Maintenance Cost (Refer 5.2, 5.3, 5.4 and Table 6 of CP). Please note that the operating expenses are increasing in line with inflation and volumes.

Further, we have continued to maintain our quality and safety certifications to ensure compliances with the regulations and to meet the required service standards by the airline customers.

Therefore, all our cost are justified and well controlled.

5. Tariffs:- (Refer 6.1, 6.2, 6.3, 6.4, 6.5 and Table 7,8 & 9 of the CP)

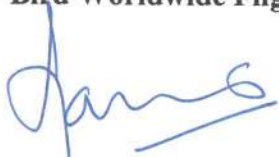
The observation made are of very generic and lacks substance to support this observation. SpiceJet has to understand that these rates are maximum rates and SpiceJet has option of discussing and negotiating. SpiceJet also has option of choosing other service provider or do self-handling in case negotiated prices are not suitable to them.

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Please do Let us know in case you need any information or clarification in this matter

For and on Behalf of

Bird Worldwide Flight Services Mumbai Private Limited



Authorised Signatory

Sundeep Kr. Jain

