



THE AIR CARGO AGENTS ASSOCIATION OF INDIA

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ACAAI/AERA-14/19/2012

28 May, 2012

Shri Yashwant S. Bhawe
Chairperson

Airports Economic Regulatory Authority of India (AERA)

AERA Building

Administrative Complex

Safdarjung Airport

New Delhi - 110003

Email: chairperson@aera.gov.in; ysbhawe@gmail.com

Shri Yashwant S. Bhawe
31/5/12
Secretary
OSJ-11
31/5/12

Sub: consultation paper no. 3/2012/13 on Multi year Tariff Proposal

Dear Shri Yashwant Bhawe,

Air Cargo Agents Association of India (ACAAI) in short is body recognized by Ministries involved with cargo transport – especially by air. We are an integral part of many of the Ministerial forums at National and Regional levels providing valuable support and service to air cargo industry.

In fact, it was solely the efforts of (ACAAI) that ensured air cargo is brought under the purview of AERA by our representation and our personal appearance before the Parliamentary Committee.

We have made many suggestions to AERA in the past few years including our reservations about the methodology adopted by some of the air terminal operators to enhance their coffers by upward tariff revisions with least concern for the Trade & Industry.

We have questioned their approach and conveyed our concerns to AERA on many occasions. We strongly believe that there has to be a joint meeting of stakeholders convened not by the terminal operators but by AERA where there could be a free and frank exchange of views in analyzing a tariff revision proposal. Unfortunately, this has not become a reality so far despite creation of an exclusive regulator for air and Air Cargo – AERA.

We have time and again emphasized that there should be two components for any tariff revision and both should be dependent upon –

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Chairman AERA on time

AGM (SA)

Pls put up.

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1. A comprehensive proposal by the terminal operators seeking revision that should include investments, expected returns, resultant improvements in the efficiency levels of service, etc and
2. Conditionalities, performance standard, benchmarking of activities that the terminal operator is mandated to meet in their operations.

We are of the firm view that these two are the very essence of any tariff and are inseparable. While on one side the Trade & Industry is penalized for any delay (and even if the Trade & Industry is not the cause for such a scenario and have not contributed for the delays). It is unfortunate that the terminals are allowed to cover up their inefficiencies and are permitted enhanced tariff and additional penal charges completely at the cost of Trade & Industry without monitoring their accountability.

In many of our representation to AERA we have highlighted this but find the silence of AERA very strange as we are voicing the concerns of the ultimate end users.

We would be happy to know what could be an effective approach for our concerns to be heard and addressed as we feel that slowly but steadily Trade & Industry is made to suffer in terms of time and cost with no recourse or solution.

We are enclosing copy of our representation sent to Mr. Kapil Chaudhary, AERA on 14th May, 2012.

We would be happy to call on you on a date and time of your convenience to share our anguish.

Thanking you,

Yours faithfully,



Bharat Thakkar
President

Encl.: As above

From: Tulasi Prasad [mailto:tulasi.prasad@hindustancargoltd.in]
ant: Monday, May 14, 2012 7:18 PM
To: feedback@aera.gov.in; kapil.chaudhary@aera.gov.in; cvdeep@gmail.com
Subject: consultation paper no. 3/2012/13 on Multi year Tariff Oroposal

To ,
Shri Kapil. Chaudhary, Secretary,
Airports Economic Regulatory Authority of India,
AERA Building,
Administrative Complex,
Safdarjang Airport,
New Delhi - 110 003.

SUB : CONSULTATION PAPER NO.3/2012/13 ON MULTI YEAR TARIFF PROPOSAL POSTED ON A.E.R.A WEB SITE SEEKING REPRESENTATIONS FROM STAKE HOLDERS.

Dear Sir,

Interim Representation by ACAAI

We recognise AERA as the sole authority for approving and notifying tariff and charges for various operations so far as Airports across the country.

We are proud that ACAAI was instrumental for inclusion of cargo in to the scope of AERA and are confident that the interest of the cargo industry will be protected by AERA.

Initially a cursory proposal was made by Hyderabad Menzies Air Cargo Pvt Ltd. to increase the tariff and we were a part of the discussion.

Subsequently, we informed HMA CPL that any tariff revision has to be routed through AERA and our mail to this effect which was responded by them confirming that they will approach you for revision and that they do not intend to increase notified rates till 31st March 2013 is enclosed. → not enclosed!

Since HMA CPL has committed that they would not increase the tariff till April 2013 we assume that the present consultation paper available in the Website of AERA is for next financial year.

We suggest that AERA may circulate the proposal to users of HMA CPL, seek their views, call for a joint meeting before any revision is accepted.

We are confident we will have your understanding on this issue.

Thanking you,

Tulasi d. Prasad
ACAAI CHAIRMAN, HYDERABAD SUB-REGION.

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CC to:

- A] ACAAI Head Quarters,
- B] BAR, Hyderabad,
- C] CHA Association , Hyderabad,
- D] ACAAI ,G.S and Treasuere , Hyd.