



## **BUSINESS AIRCRAFT OPERATORS ASSOCIATION**

Ref. No. BAOA/AERA/15/2017-18 February 21, 2018

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

मारतीय विमानपत्तन आर्थिक विनिमायक प्राधिकरण राफदरजंग एयरपॉट, नई दिल्ली-110003 प्राप्त डायरी नः:: 11944 तारीख ....21/02/18

Subject:- Comments on AERA Consultation Paper 44/2017-18

Madam,

Please refer your Consultation Papers 44/2017-18

The following comments are offered:-

- (i) AERA has adopted 'light touch approach' for deciding the aeronautical tariff for AIATSL at Guwahati International Airport due to service deemed as 'non-material'. However, there is a lack of competition at the airport due to only one GHA operating there, This situation doesn't conform to provision of 'competition laws' and the latest GH Policy of the GOI (Please refer para 3(d) o the Gazatte of India F.No. AV-24011/8/2017-AAI-MoCA dated 15 December 2017). Further, there is no 'Concession Agreement' in place with the Airport Operator.
- (ii) The 'service provider' has also not conducted any stakeholders consultation, and the GH services are 'Non-competitive', which mandates rationalisation of the proposed tariffs as this is critically important for deciding tariff in 'light touch approach'

We are readily available for any further discussion/clarification on this issue.

Thanking youper

For Business Aircraft Operators Association

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

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