

SpiceJet Limited

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September 27, 2023

To,
The Chairperson,
Airports Economic Regulatory Authority,
AERA Building, Administrative Complex,
Safdarjung Airport,
New Delhi - 110 003.

Kind Attention - Shri. Balwinder Singh Bhullar Ji

Subject:

Response to the AERA Consultation Paper No. 12/2023-24 dated September 06, 2023 on determination of tariff for Ground Handling Services for M/s Indo Thai Amritsar Private Limited (ITAPL), at Sri Guru Ram Das Jee International Airport, Amritsar for the First Control Period (FY 2022-23 to FY 2026-27)

Dear Sir,

We write in response to the Consultation Paper No. 12/2023-24 issued on Septembe 06, 2023 ("Consultation Paper" or "CP") by the Airports Economic Regulatory Authority of India ("AERA" or "Authority") as referred in to the Subject above.

At the outset, we would like to express our sincere gratitude to AERA for inviting stakeholder comments on the Consultation Paper.

1. Refer Para 2.7 & 2.8

We appreciates AERA's advice to IATPL to hold the stakeholders' consultation meeting again so as to enable the stakeholders to participate in the consultation process a meaningful manner. Such meeting should have been concluded before the CP had been published.

2. Refer Para 4.2, 5.3 and Table 5 & 6:

It may please be noted that cost incurred by ITAPL impacts the airlines, as such cost is passed through or borne mostly by the airlines. In order to ensure that there is no adverse impact/increase in the tariff, we request AERA to kindly put on hold any increase in Capital & Operational expenditure by ITAPL not related to safety or security.

3. Refer Annexure I, II & III of the Consultation Paper:

We kindly request that the approved Tariff Rates for ITAPL do not exceed the rates as approved by the Authority for M/s Air India Airport Services Limited (AIASL) for similar services being rendered by them at Amritsar for the relevant periods.

We humbly request AERA to kindly consider our submission as mentioned above, and review the proposed tariffs in light of the same, as the proposed rates of tariff are very high against the back drop of COVID-19, looming recessionary fears as well as recent collapse of an airline which may be in part due to high tariffs.

We hope that you will consider the above recommendations/ comments positively, as it will help in achieving the affordability and sustainability of the aviation sector including airlines, which is also outlined as a key objective in the National Civil Aviation Policy, 2016.

We look forward to your continued support in these challenging times.

Thanking you in advance,

Yours Truly, For SpiceJet Limited

Survavir Singh Bisht

Sr. General Manager - Regulatory Affairs

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Copy to: Director (P&S Tariff), Airports Economic Regulatory Authority of India