

**Fwd: Submission of Stakeholder Comments:
Support for Eastern Connectivity Tunnel (ECT) –
KIAB, Bengaluru**

rajan.gupta1 <rajan.gupta1@aera.gov.in >

RAM KRISHAN <director-ps@aera.gov.in >

Thu, 18 Jun 2026 1:19:33 PM +0530

To "rajan gupta"<rajan.gupta1@aera.gov.in>

राम कृष्ण | Ram Krishan
निदेशक (पी. एवं एस.)| Director (Policy & Statistics),
भारतीय विमानपत्तन आर्थिक विनियामक प्राधिकरण (ऐरा)| Airports Economic Regulatory
Authority of India (AERA),
उड़ान भवन, सफ्दरजंग हवाई अड्डा| UDAAN Bhawan, Safdarjung Airport,
नई दिल्ली| New Delhi - 110 003
दूरभाष| Phone : 011-24695043
www.aera.gov.in

===== Forwarded message =====

From: APAI National Secretary <nationalsecretary@apaiindia.com>

To: <director-ps@aera.gov.in>, <rajan.gupta1@aera.gov.in>

Cc: <secretary@aera.gov.in>

Date: Thu, 18 Jun 2026 12:51:14 +0530

Subject: Submission of Stakeholder Comments: Support for Eastern Connectivity Tunnel (ECT) – KIAB, Bengaluru

===== Forwarded message =====

Dear Sir/Madam,

The Air Passengers Association of India (APAI) appreciates the opportunity to participate in the consultation process for the Fourth Control Period tariff determination at Kempegowda International Airport (KIAB).

As the voice of the flying public, APAI believes that the infrastructure at our airports must evolve in tandem with passenger demand and the growth of our urban centres. In this context, we wish to record our firm support for the **Eastern Connectivity Tunnel (ECT)**.

Our support is rooted in the following considerations:

- **Addressing the "Single Point of Failure":** Currently, KIAB is reliant on NH-44 as the primary access point. This creates a critical business continuity risk. The ECT provides the necessary redundancy from the eastern side of the campus, ensuring long-term resilience.
- **Data-Driven Necessity:** Analysis indicates that approximately 25% to 30% of airport-bound vehicles emanate from East and South-East Bengaluru. For this significant segment of our passengers, the tunnel is not a luxury but an essential route that avoids the congestion of the Outer Ring Road.
- **Sustainability and Efficiency:** The 1.9km tunnel will provide a shorter, direct connection to the terminal forecourt. By enabling passengers to save on driving distance and time, this project directly aligns with broader sustainability goals by reducing aggregate fuel consumption and carbon emissions.

While we recognize the Authority's mandate for cost-prudence, we urge AERA to view the ECT as a vital investment in the passenger journey. An airport is only as accessible as its last-mile connectivity; for a significant portion of Bengaluru's residents, the ECT is the most efficient bridge to the terminal.

Sincerely,
Sethu Vaidyanathan
Co-Chairman & National Secretary
www.apaiindia.com



**Fwd: Legal and Economic Justification for the
Inclusion of ECT in the RAB – KIAB Tariff
Determination****rajan.gupta1** <rajan.gupta1@aera.gov.in >**RAM KRISHAN** <director-ps@aera.gov.in >

Mon, 22 Jun 2026 1:34:59 PM +0530

To "sahilmahajan"<sahil.mahajan@pwc.com>,"anmolshankar"
<anmol.shankar@pwc.com>Cc "rajan gupta"<rajan.gupta1@aera.gov.in>,"Mukesh Wadhwa"<dirps-
2@aera.gov.in>

राम कृष्ण | Ram Krishan
निदेशक (पी. एवं एस.)| Director (Policy & Statistics),
भारतीय विमानपत्तन आर्थिक विनियामक प्राधिकरण (ऐरा)| Airports Economic Regulatory
Authority of India (AERA),
उड़ान भवन, सफदरजंग हवाई अड्डा| UDAAN Bhawan, Safdarjung Airport,
नई दिल्ली| New Delhi - 110 003
दूरभाष| Phone : 011-24695043
www.aera.gov.in

===== Forwarded message =====

From: Secretary AERA <secretary@aera.gov.in>To: "RAM KRISHAN"<director-ps@aera.gov.in>,"Mukesh Wadhwa"<dirps-2@aera.gov.in>,
"Inderpal Singh"<inderpal.s@aera.gov.in>,"SATISH KUMAR"<satish.kr@aera.gov.in>

Date: Mon, 22 Jun 2026 09:58:19 +0530

Subject: Fwd: Legal and Economic Justification for the Inclusion of ECT in the RAB – KIAB
Tariff Determination

===== Forwarded message =====

===== Forwarded message =====

From: APAI General Counsel <generalcounsel@apaiindia.com>To: <director-ps@aera.gov.in>,<rajan.gupta1@aera.gov.in>Cc: <secretary@aera.gov.in>

Date: Thu, 18 Jun 2026 13:03:45 +0530

Subject: Legal and Economic Justification for the Inclusion of ECT in the RAB – KIAB Tariff
Determination

===== Forwarded message =====

Dear Sir/Madam,

On behalf of The Air Passengers Association of India (APAI), I am submitting our technical comments regarding the inclusion of the Eastern Connectivity Tunnel (ECT) in the Regulatory Asset Base (RAB) for the Fourth Control Period at KIAB.

Our stance is based on the following regulatory and economic principles:

1. **Inherent Aeronautical Integration:** We contend that the ECT is not a standalone road project. The design necessitates the tunnel to be developed directly under future aircraft parking stands. By virtue of this physical integration and its role in site-wide landside-airside traffic management, the ECT should be classified as an integral component of the airport's "ground facility" infrastructure.
2. **Mitigation of Business Continuity Risk:** Under the AERA Act, the Authority must consider the "economic and viable operation of major airports." The reliance on a single point of failure (NH-44) poses an unacceptable risk to airport business continuity. The ECT mitigates this risk by providing a secondary, secure access point, thereby directly supporting the operational viability mandated under Section 13(1)(a)(iv).
3. **Economic Justification of RAB Inclusion:** APAI argues that the "user-pays" principle should be interpreted to include the cost of infrastructure that directly optimizes airport throughput. The tunnel addresses the specific traffic distribution of KIAB (where nearly 30% of traffic is from the eastern corridor), and its inclusion in the RAB is the most transparent mechanism to ensure that the asset is funded and maintained to international safety and capacity standards.

We invite the Authority to perform a holistic cost-benefit analysis that quantifies the "time-cost" savings for the 30% of passengers currently forced into inefficient detours, and we remain available to discuss the legal merits of classifying this tunnel as essential airport infrastructure.

Sincerely,

Siddharth Mehta
Co-Chairman & General Counsel
www.apaiindia.com

