



75
आज़ादी का
अमृत महोत्सव



भारतीय विमानपत्तन प्राधिकरण
AIRPORTS AUTHORITY OF INDIA

NM-19049/50/2015-CNS-O&M/35

दिनांक: 17.08.2023

To

Shri Akhilesh Kumar Trivedi,
Advisor (Networks, Spectrum & Licensing),
Telecom Regulatory Authority of India,
Mahanagar Doorsanchar Bhavan, JL Nehru Marg,
New Delhi - 110002 (E mail: advmn@trai.gov.in / pavan.sharma@trai.gov.in)

Sub: AAI Response to TRAI Supplementary Consultation Paper 12/2023 on Data Communication Services – reg.

Sir,

In continuation to our even numbered letter dated 10.01.2023, AAI response to the "Supplementary Consultation Paper on Data Communication Services between Aircraft and Ground Stations provided by organizations other than AAI" is as follows:

- **SQ1. In case it is decided to bring data communication services between aircraft and ground stations provided by organizations other than AAI under service licensing regime, what should be the eligibility conditions for obtaining service licence for data communication services between aircraft and ground stations? Please provide a detailed response with justifications.**

AAI Response: The eligibility conditions may include necessary approvals/permission from DGCA to provide such services by the data Communication Services Provider (CSP) over Indian airspace. Being the safety critical aeronautical services, CSP should also have experience in providing data services between aircraft & ground stations.

Supplementary issues related to methodology for spectrum assignment.

AAI Response: No comments.

- **SQ2. In case it is decided to auction the spectrum in the frequency range 117.975-137 MHz for Data Communication Services between Aircraft and Ground Stations:**

AAI Response: This band has been allocated exclusively by ITU for aeronautical communication services and therefore the entire band may not be considered for auctioning. As per ICAO Doc-9718 (Vol-II), out of frequency range 117.975-137 MHz, only sub-band 136.900-136.975 MHz is reserved worldwide for VHF air-ground data link communications.

- (a) **What should be the eligibility conditions for participating in auction?**

AAI Response: No comments.

- (b) **Whether the entire available spectrum in 117.975 - 137 MHz band at each airport/ground station should be put to auction?**

AAI Response: AAI is the only national air navigation services provider apart from Defence (IAF, Indian Navy etc) which uses the subject band for providing critical safety of life aeronautical VHF communication services for aircraft operation. Hence, it is not recommended to auction the frequency band (117.975-137 MHz) or part thereof, as it may affect aviation sector in the country.

for

Cont'd on page 2...

(c) **What should be the block size of spectrum and minimum bid quantity in terms of number of blocks?**

AAI Response: No comments.

(d) **What should be the spectrum cap for each airport/ ground station?**

AAI Response: No comments.

(e) **What should be the roll-out obligations associated with the assignment of spectrum at each airport/ ground station?**

AAI Response: No comments.

(f) **What should be the period of assignment of spectrum?**

AAI Response: No comments.

(g) **What should be the minimum period beyond which the spectrum acquired through auction may be permitted to be surrendered?**

AAI Response: No comments.

(h) **What should be the process and associated terms and conditions for permitting surrender of spectrum through auction?**

AAI Response: No comments.

- **SQ3. In case of auction based and/or administrative assignment of spectrum, what should the payment terms and associated conditions for the assignment of spectrum for Data Communication Services between Aircraft and ground Stations relating to:**

i) **Upfront payment,**

ii) **Moratorium period,**

iii) **Total number of installments to recover deferred payments, and**

iv) **Rate of discount in respect of deferred payment and prepayment?**

Please support your answer with detailed justification.

AAI Response: No comments.

- **SQ4. Whether there are any other issues/ suggestions relevant to the subject? The same may be submitted with proper explanation and justification.**

AAI Response: As per practice in vogue, WPC Wing/DoT seeks AAI frequency coordination before assigning a frequency spot to any Govt/Pvt agency. The same practice needs to be continued to avoid harmful interference to the existing safety critical aeronautical services due to in-band/out-of-band emissions.

भवदीय,



(अजय कुमार कपूर)

महाप्रबंधक (सं.दि.नि.-संचार)