Federation of Indian Airlines
E-166, Upper Ground Floor,
Kalkaji,
New Delhi - 110019.
Website: www.fiaindia.in
<u>*MOST URGENT*</u>

23 January 2023

To,
The Telecom Regulatory Authority of India,
Mahanagar Doorsanchar Bhawan,
Jawaharlal Nehru Marg, next to Zakir Hussain College,
New Delhi-110002.

Kind Attn: Shri Akhilesh Kumar Trivedi, Advisor (Networks, Spectrum and Licensing)

Sub: FIA Response to the TRAI Consultation Paper. No. 14/2022 on "Data Communication Services between Aircraft and Ground Stations Provided by Organizations other than *Airports Authority of India*".

Dear Sir,

We, the Federation of Indian Airlines ("**FIA**") are writing to you on behalf of our member airlines, IndiGo, SpiceJet, Air India and Go First in response to the Consultation Paper No. 14/2022 issued by the Telecom Regulatory Authority of India ("**TRAI or The Authority**") dated 10th December 2022 on "*Data Communication Services between Aircraft and Ground Stations Provided by Organizations other than Airports Authority of India*" ("**Consultation Paper**"). At the outset, FIA would like to express our gratitude to TRAI for inviting comments on the Consultation Paper.

As mentioned under para 2.7 of the Consultation Paper, airline operators make use of data communication services between aircraft and ground stations through 'Aircraft Communication Addressing and Reporting System' ("**ACARS**") for various applications such as detecting "OOOI events" (i.e., Out of the gate, Off the ground, On the ground and Into the gates), for ATC Pre- Departure Clearance and other Flight Management System applications, for Equipment health and maintenance data and automated ping message/response.

Further, the Directorate General of Civil Aviation ("**DGCA**") vide Air Safety Circular 04 of 2014 dated 5th May 2014 on the subject "ACARS and its continuous operation during flight" ("**DGCA Circular**"), issued certain instructions and guidelines to be complied by all scheduled and non-scheduled aircraft operators for "Flight Following" on real-time basis which includes tracking of aircraft through deployment of ACARS and/or ADS-B. It may be noted that the above requirement is critical from a safety standpoint for an airline operator which not only assists in tracking the aircraft upon its going missing or meeting with an unfortunate accident but also helps in assessing operationally critical information like weather conditions and conditions of various aircraft systems and sensors on a real time basis.

In compliance with the DGCA Circular, airlines use the VHF data communication services provided by service providers such as M/s. Societe Internationale de Telecommunications Aeronautiques ("**SITA**") and M/s. Bird Consultancy Services Limited ("**BCS**") ("collectively referred to as **Service Providers**") (currently at limited airports in India). Further, it is observed as per para 1.1 of the Consultation Paper, that during 2006-2010, SITA was assigned to operate at 28 airports and BCS was assigned to operate at 04 airports in India. FIA also understands that during 2014, 2015 and 2021 SITA has applied for grant of license (Wireless Operating License "WOL") for 15 new/additional locations/stations and during 2012 BCS have applied for 10 new/ additional locations/stations, which are currently pending for approval with the DoT.

FIA understands that such pendency for grant of license/approval with DoT is primarily due to a) the concern raised that the operations by both the Service Providers is not captive in nature, and includes a commercial angle; b) is being offered in a sensitive area such as civil aviation.

Sir, it may be appreciated that aviation in India has significantly grown in the last decade (barring period affected due to COVID-19), with airline operators substantially increasing their fleet and connectivity to/fro and within India. Accordingly, in view of such exponential growth of aviation sector in India coupled with regulatory requirements (i.e., DGCA Circular) regarding the safety and security of aircraft operations, it is paramount that the Service Providers (like SITA and BCS) are able to provide the VHF data communication services required by the airline operators, on a PAN India basis.

In view of the above, FIA requests DoT and TRAI to expeditiously issue all requisite licenses/approvals sought by the Service Providers in compliance with applicable laws and regulations as prescribed by DoT and TRAI. Needless to state that timely issuance of license in an economically efficient manner to the Service Provider will benefit all civil aviation users of the VHF data communication services i.e., Airports Authority of India (AAI), Airlines operators ultimately benefitting passengers.

We hope that your good office will positively consider such recommendations/ comments as it will help in achieving the safety goals with affordable and sustainable air travel.

Thanking you in advance.

For and on behalf of Federation of Indian Airlines,

UJJWAL DEY
Associate Director