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GOVERNMENT OF INDIA
MINISTRY OF CIVIL AVIATION
RAJIV GANDHI BHAWAN, SAFDARJUNG AIR PORT
NEW DELHI - 110 003

DO No.: AV-19032/3/2015-AAI-MOCA (82868) 26th October, 2017

Dear Sir,

Kindly refer to your letter No. 102-6/2017-NSL-II dated 5th October, 2017 addressed to Secretary, Civil Aviation, requesting for the comments of this Ministry on the Consultation Paper on 'In-Flight Connectivity' (IFC).

2. The comments of this Ministry have been finalized in consultation with Directorate General Civil Aviation and Airports Authority of India and the same is enclosed.

With warm regards.

Yours sincerely,

Encl: As above.


(Venkatramana Hegde)

Shri S. K. Gupta,
Secretary, Telecom Regulatory Authority of India,
Mahanagar Doorshanchar Bhawan,
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New Delhi



TRAI Consultation Paper on 'In Flight Connectivity'

Q. No.	ISSUES FOR CNOSULTATION	DGCA Comments
1.	Which of the following IFC services be permitted in India? a. Internet services b. Mobile Communication services (MCA service) c. Both, Internet and MCA	Both, Internet and MCA may be allowed in India.
2.	Should the global standard of AES/ESIM, shown in Table 2.1, be mandated for the provision of AMSS in Indian airspace?	Yes. Global standard of AES/ESIM may be followed.
3.	If MCA services are permitted in Indian airspace, what measures should be adopted to prevent an airborne mobile phone from interfering with terrestrial cellular mobile network? Should it be made technology and frequency neural or restricted to GSM services in the 1800 MHZ band in line with EU regulations?	It is submitted that besides airborne mobile phone not interfering with terrestrial cellular network, it should be ensured that it may please be ensured that aeronautical spectrum is protected and is not infringed upon. The aeronautical spectrum as per ICAO Annex 10 used by various services is enclosed at Annex-1 for redy reference. Further IFC systems should use international standards specified for these systems by RTCA and EURCAE i.e. EURCAE ED 130A/RTCA DO-363- Guidance for the use of portable electronic devices (PED) on board aircraft.
4.	Do you foresee any challenges, if the internet services be made available 'gate to gate' i.e. from boarding gate of the departure airport until the disembarking gate at the arrival airport?	Yes. For this globally adopted standards/safe practices as mentioned above in para 3 may please be followed. However, the switching ON/OFF control of the unit shall be available with crew. In addition there should be no usage during climb and approach. i.e at altitude of 3000 meters or above. (Most

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		of airlines like Singapore, Qatar Airways, Japan Airlines etc. allows on board internet services above 10,000 feet. British Airways, American Airlines donot allow internet services during Taxi, Take-off and Landing.)
5.	Whether the Unified Licensee having authorization for Access Service/Internet Service (Cat –A) be permitted to provide IFC service in Indian airspace in airlines registered in Indian?	MoCA has no objection.
6.	Whether a separate category of IFC Service provider be created to permit IFC services in Indian Airspace in Airlines registered in India?	MoCA has no objection.
7.	Whether an IFC service provider be permitted to provide IFC services, after entering into an agreement with Unified Licensee having appropriate authorization, in Indian airspace in airlines registered in India?	MoCA is in support the proposal.
8.	If response to Q.7 is YES, is there any need for separate permission to be taken by IFC service providers form DoT to offer IFC service in Indian airspace in Indian registered airlines? Should they be required to register with DoT? In such a scenario, what should be the broad requirements for the fulfilment of registration process?	No. No need for IFC to take separate/prior permission from DOT. They may inform the DOT regarding the arrangement.
9.	If an IFC service provider be permitted to provide IFC service in agreement with Unified Licensee having appropriate authorization in airlines registered in Indian, which authorization holder can be permitted to tie up with an IFC service provider to offer IFC service in Indian airspace?	This issue may be left between IFC & Unified Licensee.

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10.	What other restrictions/ regulations should be in place for the provision of IFC in the airlines registered in India?	For this globally adopted standards/safe practices as mentioned above in para 3 may please be followed. However, the override control of the unit should be available with crew. In addition there should be no usage during climb and approach. i.e at altitude of 3000 meters or above. (Most of airlines like Singapore, Qatar Airways, Japan Airlines etc. allows on board internet services above 10,000 feet. British Airways, American Airlines do not allow internet services during Taxi, Take-off and Landing.)
11.	What restrictions/ regulations should be in place for the provision of IFC in the foreign airlines? Should the regulatory requirements be any different for IFC service provider to offer IFC services in Indian airspace in airlines registered outside India vis-à-vis those if IFC services are provided in Indian registered airlines?	Same for all operators both domestic and foreign carriers. There should be no difference regulatory requirements for foreign carriers/ domestic carriers.
12.	Do you agree that the permission for the provision of IFC services can be given by making rules under Section 4 of Indian Telegraph Ac, 1885?	DOT may decide on the matter.
13.	Which of the option discussed in Para 3.19 to 3.22 should be mandated to ensure control over the usage on the IFC when the aircraft is in Indian airspace?	No restrictions on International operators (3.22). For Domestic Operators para 3.20 or 3.21 may be followed.
14.	Should the IFC operations in the domestic flights be permitted only through INSAT system (including foreign satellite system leased through DOS)?	
15.	Should the IFC operations in international flights (both Indian registered as well as foreign airlines) flying over multiple jurisdictions be permitted to use either INSAT System or foreign satellite system in Indian airspace?	

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16.	Please suggest how the IFC service providers be charged in the following cases? (a) Foreign registered airlines. (b) Indian registered airlines.	International best practice may be followed to promote Indian registered airlines, only nominal/minimum charges should be levied.
17.	Should satellite frequency spectrum bands be specified provisioning of the IFC services of spectrum neutral approach be adopted?	Spectrum neutral approach to be followed. However, it may please be ensured that aeronautical spectrum is protected and is not infringed upon.
18.	If stakeholders are of the view that IFC services be permitted only in specified satellite frequency band, which frequency spectrum bands should be specified for this purpose?	Spectrum neutral approach to be followed. However, it may please be ensured that aeronautical spectrum is protected and is not infringed upon.