

AIX Connect Private Limited

(Formerly Known as AirAsia (India) Private Limited)

CIN: U62200KA2013PTC086204

Date: 09th January 2023.

To,

Shri Akhilesh Kumar Trivedi,

Advisor (Networks, Spectrum and Licensing)

Telecom Regulatory Authority of India

New Delhi

Sub: Response to TRAI Consultation paper on Data Communication Services Between Aircraft and Ground Stations Provided by Organizations Other Than Airports Authority of India

Dear Sir,

AIX Connect Private Limited have been relying on Services Providers like SITA and Collins for many years to cater to the air-to-ground communications which compliments the other established voice communication channel that we have with ATC. These services are intended for safety, navigation and communication required for arrangements of the flight journey. All Airlines flying in Indian airspace are required to comply with the Air Safety Circular 04 of 2014 dated 5th May 2014 on Aircraft Communication Addressing and Reporting System issued by DGCA. It is very important that Service Providers are issued Wireless Operating Licenses (WOL) and for Airlines who are subject to stringent certification and regulation in respect of their aircraft, Systems and procedures to ensure safe and regular flight, it is paramount that the Service Providers are able to cater to PAN India coverage.

AIX Connect Private Limited would like to thank the Telecom Regulatory Authority of India (TRAI, or The Authority) for the opportunity to comment on this important consultation Paper on "Data Communication Services Between Aircraft and Ground Stations Provided by

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Organizations Other than Airports Authority of India” issued on 10th December 2022. The Consultation Paper takes up the important aspect relating to air-to-ground communications.


AIX Connect Private Limited would like to request TRAI to consider the critical role of the Service Provider in facilitating this essential service, required by all airlines while flying across the world. Its vital that the India Government extended the desired support to the Air Transport Community. TRAI should facilitate recommendation which is in line with India’s moto of “Ease of Doing Business”. The license fee should be kept at moderate level in line with the best practice seen in Asia Pacific. TRAI should consider benchmarking the license levies by comparing license fee for same service in other neighbouring counties.

Conclusion

AIX Connect Private Limited would want to draw TRAI’s attention on the vast majority of Airports that are not being catered by the Service Provider due to license deferment by the licensor. It is critical considering the above that the WOL are streamlined for smooth issuance of licenses to Service Providers and at a price which are comparable with the other Asia Pacific region.

Thanking you,

Yours sincerely

DocuSigned by:

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Amarjith Padman,

Head-IOCC.

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