



Date: 09/01/2023

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,

We understand that Indian and Global Airlines using India air space have been relying on entities like SITA and Collins for many years to cater to the air-to-ground communications in addition to the well-established voice communication channel that Airport Authority of India provides. 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 entities are issued with 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.

TRAI while submitting its recommendation to DOT, should take into consideration the critical role of the private agencies in facilitating this essential communication requirement, required by all airlines while flying across India airspace. Now the voice communication between the Aircraft and Air Traffic Controller (ATC) is very limited and this is shifted to Data Communication to avoid the misunderstanding. The critical data on weather, wind, its velocity, direction, Air Pressure, then flight's individual information like passenger load, luggage load, terminal, parking bay etc are also communicated through this data communication only. Since this Communication is critical for public safety, it is made mandatory that every Airlines should communicate in every 15 mins. It is found that the ground to Air **Data communication** at all the Airports in India is provided by SITA and Birds Consultancy Services, and AAI is also availing this facility from SITA at different Airports in India. It's vital that all concerned Government stakeholders extended the desired support to the Air Transport Community. It is impossible for each Airlines to make this communication at every Airport they operate from. The number of International Flights just making a few stops in multiple Airports in India to operate this data communication will stop them operating in India. The Govt. is planning to have a greater number of commercial Airports and expected to increase the passenger volume in many folds, AAI is handing over the Airports to Private players and withdrawing itself from such services. This data communication is made mandatory by DGCA requiring the Airlines to comply with and every airline to have it individually at each operating Airport is neither economically viable nor practically doable.



Globally this requirement is understood by every country and accordingly the frequency is allocated. **This Data communication requires only a single spot frequency in VHF with a maximum of 25KHz Bandwidth.** Considering the above facts, TRAI may recommend a charging mechanism only a nominal fee. The Spectrum Charges may be kept at moderate level in line with the best practice seen in Asia Pacific and the rest of world.

Thanking you,
Yours sincerely

For Infotel Bizcon Pvt Ltd

K V Thomas
Director