

SITAONAIR submission in reply to TRAI's Consultation Paper

On

Consultation Paper

on

Inputs for Formulation of

National Telecom Policy – 2018

I. INTRODUCTION

We are delighted to have this opportunity to contribute our submission to the TRAI consultation process. SITAONAIR is part of the SITA Group the world's leading air transport IT and communications specialist.

SITA history and presence in India

The SITA Group has a strong local presence in India with more than 300 staff currently employed in Gurgaon and Chennai and over 60 years' experience working collaboratively at the heart of Indian aviation. SITA Group services are provided already to Air India, AirAsia India, Air Costa, GoAir, IndiGo, Jet Airways, SpiceJet, and Vistara and at the 38 AAI Airports as well as Mumbai and Bangalore.

SITAONAIR History and Commercial Offerings

OnAir was created in 2005 as a joint venture between Airbus, one of the world's leading aircraft manufacturers, and SITA, the leading IT solutions provider to the air transport world and 100% owned by air transport industry members. The venture brought together the expertise of an Airbus-sponsored company developing in-flight e-mail and text-messaging services, and SITA's inflight passenger communications program, which was focused on inflight mobile telephony. In December 2007, it provided the first mobile telephony in the world on-board a commercial aircraft.

Since January 2015, OnAir has used the name SITAONAIR, reflecting its position as a full subsidiary of the SITA Group. SITAONAIR provides the complete range of products and services an airline needs to realize the full potential of the connected aircraft.

SITAONAIR offers its airline customers a suite of connectivity options that includes in-flight communications to passengers (Mobile Communications, Internet and streaming video

content) as well as solutions to streamline cabin and cockpit operations (e.g. Electronic flight Bags) and to optimize maintenance procedures.

We have 400 airline customers operating over 14,000 aircraft, and 80% of the of the world's airlines use SITAONAIR AIRCOM® to connect every resource, from pilots to ATC. It is headquartered in Geneva, and has offices in London, Montreal, Atlanta and Singapore, with more than 280 staff worldwide

SITAONAIR engagement with Indian Government entities and other stakeholders over many years

Over recent years, SITAONAIR has engaged on a regular basis with senior-level officials at the Department of Telecommunications, the DGCA, the Ministry of Civil Aviation, the Airports Authority of India, the Prime Minister's Office, as well as with BSNL and other stakeholders in the industry to encourage the adoption of a policy for authorising in-flight connectivity ("IFC") in India. At the end of last year, SITAONAIR actively participated in the TRAI consultation on In- Flight Connectivity.

II. ISSUES FOR CONSULTATION

Q.1 Stakeholders are requested to give their comments on structure and contents of the proposed inputs for National Telecom Policy, 2018, clearly outlining the specifics along with justification.

SITAONAIR has no comment on the structure of the NTP 2018 and it welcomes its content.

Q.2 Stakeholders may also suggest any other issue related to Policy Framework which stakeholders feel is important for growth of telecom sector, along with justification.

SITAONAIR would like to highlight that the digital transformation enabled by new technologies, particularly satellite connectivity, is a factor of growth for other Indian industries and, in particular, for the Indian aviation industry. There are some huge opportunities for Indian airlines to use connectivity to offer added value services to passengers, to bring operational efficiencies to cabin crew and cockpit and to improve aircraft maintenance. Reciprocally, the demand for connected services from the aviation industry will generate growth to the telecom sector, thus creating a virtuous circle.

In-flight connectivity services in India will contribute to the objectives of the NTP 2018 by, amongst other, participating in India becoming a global hub for internet and data communications, meeting the need of people and enterprise for connected services and providing ubiquitous, ultra-reliable, and secured connectivity in India.

While the Policy on IFC services in India has been the object of a separate consultation by TRAI, the NTP 2018 should ensure that the conditions for a virtuous circle of growth between

the airlines industry and the telecom sector are present in India. For this to happen it is essential that:

- The regulatory framework for telecom services in India keeps path with technology developments and connectivity opportunities and make possible the emergence and use of innovative services (like IFC services) in India;
- Applicable rules should be transparent, non-discriminatory, and widely publicized;
- New Satellite spectrum bands such as Ka band should be made available for satellite communications services in line with global standards (as noted in Point E e) ii of the Consultation Paper). In addition, the choice of satellite suppliers should not be restricted;
- Simple and technologically neutral licensing regimes should apply to facilitate fair competition;
- Licensing fees should not exceed what can be reasonably absorbed by an applicant and should be limited to reflect actual administrative processing costs.

We trust the above will benefit the TRAI consultations in formulating the NTP 2018.



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