

AIRPORTS ECONOMIC REGULATORY AUTHORITY OF INDIA

MINUTES OF THE STAKEHOLDERS' CONSULTATION MEETING HELD ON 10.09.2025 AT 1:30 PM IN HYBRID MODE AT INDIAN AVIATION ACADEMY, REGARDING THE CONSULTATION PAPER 03/2025-26 IN THE MATTER OF FORMULATION OF UNIFORM PERFORMANCE STANDARDS OF MAJOR AIRPORTS RELATING TO QUALITY, CONTINUITY AND RELIABILITY OF SERVICE AND ASSOCIATED ACTIVITIES

1. For the monitoring of Performance Standards of Major Airports, section 13(1)(d) of the Airports Economic Regulatory Authority of India Act, 2008 mandates AERA to monitor the set performance standards relating to quality, continuity and reliability of service as may be specified by the Central Government or any authority authorized by it in this behalf. On behalf of Ministry of Civil Aviation (MoCA), AERA has undertaken the exercise of identifying and formulating a uniform set of service quality parameters and their performance standards after doing thorough analysis and following a due diligence process and has accordingly issued a Consultation Paper No. 03/2025-26 dated 18.08.2025 calling for Stakeholders' comments on the said performance standards of Major Airports relating to Quality, Continuity and Reliability of services and associated activities. Also, as stated in the Consultation Paper a Stakeholders' Consultation meeting has been convened by the Authority on 10.09.2025 at 1:30 PM at Indian Aviation Academy, Vasant Kunj, New Delhi on a hybrid mode to elicit the views/ suggestions/ comments of the stakeholders on the proposals made in the Consultation Paper.

The List of participants is enclosed at **Annexure I**.

2. At the outset, **Secretary, AERA** welcomed all the participants attending the Stakeholder Consultation meeting. He acknowledged the presence of all the stakeholders such as DGCA, BCAS, CISE, NPC, QCI, Airport Operators, Airlines, Industry Associations, Passenger Associations, Independent Service Providers, Members of the Public, and key partners of the Indian aviation ecosystem. He expressed appreciation for the presence of a diverse and distinguished group of stakeholders. He stated that the proposed framework for performance standards aims to enhance service delivery for passengers. He concluded by inviting valuable views from stakeholders and thanked everyone for their participation.
3. **Member – II, AERA**, while welcoming all the participants stated that the aviation sector in India has undergone significant transformation over the past decades, driven by technological advancements, increasing passenger volumes, and the emergence of varied airport concession models. These developments have reshaped service delivery expectations and highlighted the need for revising existing frameworks. She outlined the consultation's purpose was to establish uniform performance standards across airports, linked to tariff mechanisms through rebates and incentives. The framework aims to enhance efficiency, accountability, and global competitiveness while improving passenger experience. She highlighted inclusivity measures for Persons with Reduced Mobility (PRM) and plans for a robust monitoring system transitioning to automated, real-time data capture. She explained that the draft standards are based on extensive research and international benchmarking. She invited valuable stakeholder feedback on the consultation paper.

4. **Member – I, AERA**, emphasized AERA's mandate under the Act to monitor performance standards, and the need for a uniform framework across all major airports as per the directive from MoCA. He noted that new technologies such as Digi-Yatra and self-service baggage drops have transformed airport operations and the proposed framework has incorporated them. He stated that the proposed standards will cover major airports handling ~90% of passenger traffic. He clarified that the presentation would provide a detailed overview of the performance standards framework. He encouraged stakeholder feedback and concluded by thanking participants for their engagement.
5. **Chairperson, AERA**, in his address to the participating stakeholders, first welcomed them all and reiterated that these standards pertain to the quality, continuity, and reliability of services provided at airports, and there is a need to benchmark these standards as existing in all major airports against international best practices and accordingly evaluate the performance of these airports against those benchmarks. He emphasized that the framework is fundamentally user-centric, focusing on passengers who, in effect, fund airport infrastructure through user charges. The goal is to ensure continuous improvement in airport facilities and service delivery. He provided context on the genesis of the initiative, noting that while performance standards do exist across various airports, they are currently fragmented and governed by different concession agreements. These agreements vary widely, leading to a lack of uniformity. The objective of the current exercise is to consolidate and harmonize these standards into a single, structured, and enforceable framework applicable to all major airports including those operated under PPP, JVC, AAI, and state governments.

The Chairperson highlighted that AERA had engaged an Independent Consultant with the mandate to study existing performance standards across concession agreements and develop a uniform, practical, and implementable framework. He stated that the presentation to follow, would elaborate on the nuances of this exercise. He also stressed the importance of stakeholder feedback in finalizing the framework. Special emphasis has been placed on inclusivity, particularly for Persons with Reduced Mobility (PRM), recognizing the reputational impact of service failures in this area. The framework integrates objective metrics with user experience indicators and embeds performance standards within the tariff regulatory structure to enable ongoing monitoring.

The Chairperson also mentioned the incentive mechanisms, noting that while previous guidelines lacked such provisions and the new proposed framework includes non-monetary incentives to recognize consistently high-performing airports. These mechanisms are expected to enhance the image and functioning of airports within their respective ecosystems.

The Chairperson also apprised that AERA is also in the process of finalizing the evaluation and monitoring mechanism by firstly engaging a third-party measurement agency. In the end, Chairperson, AERA again extended a warm welcome to all participants and expressed sincere appreciation to all for sparing their time, further emphasizing that the consultation exercise would not be complete without the valuable suggestions and insightful inputs from stakeholders. For refining and improving further the framework outlined in the consultation paper from the point of view of robustness and implementation, he advised all stakeholders to attentively follow the

presentation to be given by the Consultant and contribute their valuable inputs, suggestions and comments.

6. **Director (Tariff), AERA**, then invited Mr. Jodhbir Sachdeva, representing M/s KPMG, (AERA Independent Consultant), to deliver the presentation. He informed the participants that after the presentation, stakeholders present at the meeting, both physically and virtually, would be given the opportunity to offer their comments, feedback, and views on the proposals outlined.

M/s KPMG (AERA Independent Consultant)

7. Mr. Sachdeva thanked AERA for the opportunity to present on behalf of the Authority and extended greetings to all stakeholders participating both online and offline. KPMG made a presentation on Consultation Paper No. 03/2025-26, issued by AERA on 18.08.2025, titled "Formulation of Performance Standards of Major Airports relating to Quality, Continuity and Reliability of Service and Associated Activities." The presentation covered the following areas:

I) Background

- a) He introduced the topic by stating that the Indian airport ecosystem reflects a strong commitment to performance standards through various frameworks such as OMDA, Concession Agreements (CAs), and the AERA Guidelines of 2011. However, he emphasized that these standards are currently diffused, non-centralized, and vary significantly in terms of regulatory, procedural, and operational aspects.
- b) He highlighted the need for a uniform national-level framework for performance standards at major airports, especially in light of evolving aviation dynamics.
- c) He elaborated on the drivers of change, including:
 - Doubling of passenger volumes over the last decade and rising passenger expectations.
 - Increased adoption of technologies like Digi Yatra, Self check-in (CUSS), Self-baggage drop (SBDs), and e-gates.
 - Infrastructure expansion funded through regulated tariffs and user charges.
- d) Mr. Sachdeva then explained the policy response and regulatory action taken by AERA:
 - AERA developed a comprehensive Performance Standards Framework.
 - The framework was shared with MoCA and formed the basis of the Consultation Paper.
 - MoCA directed AERA to establish uniform performance standards and monitor across major airports.
- e) He emphasized that the framework was built upon:
 - A detailed study of existing service quality norms.
 - Benchmarking against international best practices.

- Review of global regulatory frameworks.
- f) He then referred to the legislative mandate under the AERA Act, 2008, stating that:
- Chapter VII empowers the Central Government to prescribe performance standards.
 - Section 13 mandates AERA to monitor these standards and consider them while determining tariffs.
 - Section 51 allows MoCA to make rules regarding quality, continuity, and reliability of service.
- g) Mr. Sachdeva concluded the section by stating that the proposed framework aligns with the statutory responsibilities of AERA and MoCA and aims to bring consistency, transparency, and accountability in service delivery across all major airports.

II) Proposed Performance Standards Summary

- a) Mr. Sachdeva introduced this section by stating that the proposed performance standards were developed through a comprehensive and multi-layered approach. He emphasized that the framework is designed to be reliable, comprehensive, future-ready, technology-enabled, and passenger-centric, covering all major touchpoints in the airport journey.
- b) He explained that the formulation of standards was based on:
- A detailed review of AERA documents, Concession Agreements, and international benchmarks including ICAO principles, ACI ASQ parameters, and IATA service quality frameworks.
 - Comparative analysis of global regulatory practices from airports such as Heathrow (UK), Kuala Lumpur (Malaysia), and Brisbane/Sydney (Australia).
 - Integration of provisions from the National Civil Aviation Policy (2016) and the AERA Act, 2008.
- c) Mr. Sachdeva highlighted that eight major airports were visited by KPMG team as part of the study, including Delhi, Bengaluru, Hyderabad, Kolkata, Ahmedabad, Jaipur, Trivandrum, and Patna. These visits involved:
- Infrastructure and facility assessments
 - AOCC and terminal walkthroughs
 - Passenger feedback surveys
 - Stakeholder meetings
- d) He then introduced the objectives of the proposed performance standards, which include:
- Leveraging technology for real-time monitoring and service delivery
 - Ensuring reliability and consistency in data capture

- Covering all aspects of passenger experience, including PRM (Persons with Reduced Mobility)
- e) He stated that the framework includes rebates in case of service deficiencies, which would be applied through reductions in the User Development Fee (UDF) payable by passengers. Additionally, incentives are proposed for airports that exceed performance targets.
 - f) He further explained that the standards incorporate emerging technologies such as Digi Yatra, Immigration e-gates, Self check-in (CUSS), Self-baggage drop (SBDs).
 - g) Mr. Sachdeva concluded this section by presenting the summary of proposed parameters, which includes a total of 50 parameters:
 - 32 Objective Parameters (quantifiable)
 - 18 Subjective Parameters (qualitative)
 - h) He clarified that the “Help Desk” parameter includes three sub-components: Infrastructure availability at check-in, SHA & arrival, personnel availability, and uploading of complaints via Air Sewa.
 - i) Mr. Sachdeva concluded the second part by reiterating that the proposed performance standards are not just a regulatory exercise but a strategic shift towards service excellence, passenger satisfaction, and global benchmarking. He emphasized that the framework is designed to be inclusive, scalable, and responsive to the evolving needs of the aviation sector. He invited stakeholders to provide constructive feedback to further refine and strengthen the framework.

III) Categorization of Airports

- a) Mr. Sachdeva introduced this section by explaining the rationale behind categorizing airports for performance monitoring. He emphasized that categorization is essential to ensure fairness, scalability, and contextual relevance in applying performance standards.
- b) He explained that airports have been divided into two categories:
 - **Category A:** Airports handling more than 6 million passengers per annum (mppa)
 - **Category B:** Airports handling less than 6 mppa
- c) He highlighted that this categorization enables:
 - Ease of regulation and performance measurement
 - Cost optimization
 - Uniformity in technology-driven passenger facilitation
 - Consistency in customer services and accessibility
 - Consideration of operational complexity and infrastructure requirements

- d) Mr. Sachdeva then presented the parameter distribution across the two categories:
- **Category A Airports (Total: 50 Parameters):** 32 Objective and 18 Subjective
 - **Category B Airports (Total: 44 parameters):** 28 Objective and 16 Subjective
- e) He explained that certain parameters are modified, optional, or not applicable for Category B airports due to their scale and infrastructure limitations. For example:
- Modified Objective parameters: Security Check (Terminal Entry Gate), Check-in, Security Check (Terminal), Immigration / Emigration, Seating Availability (at Boarding gates)
 - Optional Objective parameters: MCT, Misconnect passengers and baggage, Availability of Baby care and Sensory rooms
 - Not applicable Objective parameters: land side assess, Passenger Boarding Bridges Utilization, Availability of Cloak Room / Extended Baggage Storage and Cargo services
 - Not applicable Subjective parameters: Transportation between terminals and Buggy services.
- f) Mr. Sachdeva concluded this section by stating that the categorization ensures balanced implementation of performance standards while maintaining regulatory, integrity and passenger-centricity.

IV) Parameter Details and Monitoring Mechanism

- a) Mr. Sachdeva introduced the section by stating that the core of the framework lies in the identification, definition, and monitoring of performance parameters. He emphasized that these parameters are designed to be objective, measurable, and actionable, ensuring transparency and accountability in service delivery.
- b) He explained that the parameters are divided into below categories:
- Objective Parameters - Airport Core Processes
 - Objective Parameters - Airport Facilities (including for PRM passengers)
 - Objective Parameters - Customer Service / Grievance Redressal System
 - Objective Parameters - Other Parameters (for information gathering)
 - Subjective Parameters (based on passenger feedback)
 - Subjective Parameters (based on PRM passenger feedback)
- c) Mr. Sachdeva elaborated that 15 objective parameters have been identified, which are quantifiable and linked to rebates and incentives and monthly assessments will be conducted for all such parameters. These include:

- **Airport Core Processes:** Security check (Terminal entry gate) (traditional and Digi-Yatra), Check-in (economy, business, and self-baggage drop), Immigration/Emigration, Security Check (Terminal), Baggage delivery (domestic and international), and Passenger arrival time from aircraft to terminal
 - **Airport Facilities:** Uptime of FIDS, lifts, escalators, travellers, automated services; Availability of boarding bridges, baggage trolleys, seating; PRM services and pre-booked wheelchair availability
 - **Customer Service / Grievance Redressal System:** Help desks
- d) Mr. Sachdeva explained that 17 additional parameters are included for data collection and analysis. These are not linked to rebates/incentives but are critical for understanding operational trends. He stated that these parameters will be assessed annually, with the possibility of future integration into the rebate/incentive model. Examples include:
- **Other Parameters (Information Gathering):** Minimum Connect Time (MCT), Misconnect passengers and baggage, Land side access, Medical facilities, Digital information centers, Lost & found services, Baby care and sensory rooms, Charging points, Cargo services, Technology adoption metrics (Digi Yatra, SBDs, e-gates), Sustainability (green accreditation)
- e) Mr. Sachdeva then detailed the measurement methodology, emphasizing the use of technology and third-party validation. He explained:
- Queue times will be measured using CCTV footage and manual review during “sample hours” (1 to 2 hours before peak hours).
 - Uptime of assets will be calculated using SCADA systems, IT logs, and maintenance records.
 - Wheelchair requests will be tracked via centralized systems generating service tickets.
 - Complaints will be monitored for timely upload on Air Sewa.
- f) Mr. Sachdeva explained that 18 subjective parameters will be assessed through passenger surveys, covering:
- Cleanliness, Courtesy and Helpfulness of staff, Ease of wayfinding, Ambience, Transportation, Walking Distance, Buggy services, Potable water, Value for money, PRM satisfaction, Udan Yatri Café, Overall airport experience
- g) He stated that monthly surveys will be conducted for rebate-linked parameters and annual surveys for others. Surveys will be randomized, multilingual, and conducted during sample hours.
- h) Mr. Sachdeva concluded this section by emphasizing that the robust monitoring mechanism ensures that performance standards are not just aspirational but enforceable

and verifiable. He reiterated that the use of third-party assessors and technology-driven tools will ensure fairness, transparency, and consistency across all airports.

V) Rebate and Incentive Mechanism

- a) Mr. Sachdeva introduced the section by stating that the proposed framework incorporates a dual model — one that balances penalties for underperformance and with rewards for performance exceeding expectations. He emphasized that this marks a significant shift from the earlier rebate-only model to a more performance-linked tariff structure.
- b) He explained that the mechanism is designed to:
 - Encourage continuous improvement
 - Ensure accountability
 - Align airport charges with service delivery levels
- c) Mr. Sachdeva elaborated that rebates are applicable when an airport fails to meet the defined performance targets. He stated:
 - The total rebate is capped at 5%, broken down as: 4% for objective parameters and 1% for subjective parameters
- d) He clarified that rebates are applied through tariff reductions, specifically User Development Fee (UDF) and Landing charges.
- e) He further explained the conditions for rebate applicability:
 - If performance falls below target for three or more consecutive months, the rebate cannot be offset by any earned incentives.
 - If underperformance is less than three months, the rebate can be adjusted against incentives.
 - If incentives exceed rebates, the surplus can be carried forward to the next evaluation period.
- f) Mr. Sachdeva emphasized that this structure ensures persistent non-compliance is penalized, while occasional lapses are treated with flexibility.
- g) He then introduced the incentive model, stating that airports exceeding performance thresholds will be rewarded through tariff-linked incentives. The total incentive is capped at 1.25%, comprising 0.6% for objective parameters and 0.65% for subjective parameters
- h) He explained that incentives are earned when performance exceeds upper thresholds defined for each parameter.
- i) Mr. Sachdeva presented detailed tables showing parameter-wise rebate and incentive values.

- j) He explained how rebates and incentives translate into tariff revisions along with examples:
- In airports where UDF is applicable, rebates are applied to reduce UDF charges.
 - In airports where UDF is not applicable, rebates are applied to landing charges.
- k) He provided examples showing how a 1.6% rebate would be distributed across UDF and landing charges based on their share in aeronautical revenues.
- l) He concluded this section by stating that the rebate and incentive mechanism is designed to be fair, transparent, and performance-driven. He emphasized that it will not only improve service delivery but also reduce airfares for passengers, thereby making the aviation ecosystem more efficient and passenger-centric.
- m) He invited stakeholders to share their views on the proposed thresholds, applicability conditions, and financial impact to ensure the framework is balanced and inclusive.

VI) Framework – Assessment Timelines

- a) Mr. Sachdeva introduced the section by stating that timely and structured assessment is critical to the success of the performance standards framework. He emphasized that the proposed model ensures regular monitoring, transparent reporting, and predictable tariff adjustments.
- b) He explained that the framework is built around a biannual review cycle, supported by monthly performance assessments. This ensures that airports are evaluated consistently and that any rebates or incentives are applied in a timely manner.
- c) Mr. Sachdeva elaborated that for each month:
- A Monthly Assessment Report will be prepared comparing actual performance against defined targets.
 - These reports will determine parameter-wise rebates and incentives.
 - The report for a particular month will be finalized by the end of the following month, allowing time for data validation and stakeholder review.
- d) He then presented the two six-month review periods:
- Review Period 1: February 1 to July 31
 - Tariff Adjustment and Rebate Compliance Order: Released by September 15
 - Revised Aeronautical Tariffs: Effective from October 1 to March 31
 - Review Period 2: August 1 to January 31
 - Tariff Adjustment and Rebate Compliance Order: Released by March 15
 - Revised Aeronautical Tariffs: Effective from April 1 to September 30
- e) Mr. Sachdeva emphasized that this timeline ensures predictability for airport operators, transparency for passengers, and regulatory consistency for AERA.

- f) Mr. Sachdeva concluded this section by stating that the assessment timeline framework is designed to be practical, enforceable, and aligned with the beginning of the financial year. He reiterated that the structured framework of monthly and biannual reviews will help maintain service quality, and stakeholder confidence.

VII) Monitoring of Airport Performance Parameters via Third-Party Assessor

- a) Mr. Sachdeva introduced the seventh and final section by emphasizing the importance of independent oversight in ensuring the credibility and transparency of the performance standards framework. He stated that third-party assessors will play a central role in monitoring airport performance across all identified parameters.
- b) He explained that the appointment of third-party assessors is intended to:
- Avoid conflicts of interest that may arise from self-assessment by airport operators.
 - Ensure unbiased, transparent, and consistent evaluation of service delivery.
 - Build stakeholder trust in the monitoring process.
- c) Mr. Sachdeva elaborated that third-party assessors will be responsible for:
- Developing airport-specific performance measurement plans based on AERA's guidelines.
 - Monitoring Performance Standards as per measurement mechanism and measurement frequency
 - Collecting and analyzing data through Recorded CCTV footage, Passenger surveys and Manual checks and field observations
 - Verifying the timeliness and accuracy of data uploads, especially for parameters linked to rebates and incentives.
- d) He emphasized that the assessors will be trained and equipped to handle both objective and subjective parameters, ensuring a holistic view of airport performance.
- e) Mr. Sachdeva concluded the presentation by stating that the involvement of third-party assessors is a cornerstone of the framework's integrity. He reiterated that this mechanism would ensure that performance standards are not only defined and measured but also enforced in a manner that is fair, independent, and aligned with global best practices.
8. He thanked all stakeholders for their attention and invited them to share their feedback on the proposed monitoring approach, stressing that collaborative implementation is key to achieving service excellence across India's major airports.

VIII) Concluding Summary of the Presentation

- a) Mr. Jodhbir Sachdeva concluded the presentation by summarizing the key pillars of the proposed framework. He emphasized that the entire approach is passenger-centric, designed to cover every touchpoint in the airport journey — from arrival to departure, and everything in between.

b) He highlighted the following four strategic themes:

- **Passenger-Centric Approach:** Mr. Sachdeva reiterated that the framework is built around the needs and expectations of passengers, ensuring that service delivery is consistent, inclusive, and responsive across all major airports.
- **Technology-Enabled Monitoring:** He emphasized the use of advanced technologies such as AI-based queue monitoring, CCTV analytics, and centralized service tracking systems to ensure reliable and transparent measurement of performance.
- **Balanced Financial Model:** Mr. Sachdeva explained that the shift from a rebate-only model to a dual structure of rebates and incentives is aimed at fostering service excellence while maintaining financial discipline. This model rewards high-performing airports and penalizes consistent underperformance.
- **Performance-Linked Tariffs:** He concluded by stating that the framework aligns airport charges with the level of service delivered, thereby directly impacting the User Development Fee (UDF). This linkage ensures that passengers benefit from improved services through reduced airfares.

9. Director (Tariff) told that as the meeting is being conducted in hybrid mode (both physical and online), all the participants may please present their views one by one.

Views / Comments of Stakeholders

A. Airport Operators

1) Airports Authority of India (AAI)

10. Mr. Khurram Naseem, representing AAI, raised concerns mainly on three practical implementations issues related to the proposed performance standards:
- a) **Air Sewa Portal – Complaint Upload Requirement:** He referred to the proposed standard that requires 100% of passenger complaints to be uploaded on the Air Sewa portal within 24 hours. He acknowledged the operational challenges of this requirement, highlighting that passenger typically initiate complaints by themselves. He raised the question of how airport operators might be able to upload of such complaints on behalf of passengers, since air sewa portal requires registration to be done by passengers for filling complaints.
 - b) **Availability of Buggy Services at Smaller Airports:** He highlighted that many AAI-operated airports are smaller in scale, where buggy services may not be feasible or necessary. He requested AERA not to consider the applicability of this standard for such airports.
 - c) **Wi-Fi Services for Domestic Passengers:** He stated that Wi-Fi services, while important for international travelers, may not be as critical for domestic passengers, many of whom rely on mobile data. He suggested this standard to be re-evaluated in light of current usage patterns.
11. Mr. Jodhbir Sachdeva, on behalf of the Authority, responded:

- a) On the Air Sewa portal, he clarified that the requirement to upload complaints would be from the Customer Grievance Desk/Help Desk which the Airport Operator will set up with necessary logistics support and the uploading of complaints would apply once this desk is integrated with the Air Sewa Portal.
 - b) Regarding buggy services, he confirmed that the performance standard is applicable only to Category A airports, i.e., those with more than 6 million passengers per annum (MPPA).
 - c) On the Wi-Fi parameter, he acknowledged the point raised and stated that the feedback has been noted.
12. Another representative from AAI, Mr. Vikram Singh thanked AERA for organizing the session and providing a platform for operational stakeholders to share their views. He raised several operational concerns regarding the formulation and implementation of performance standards:
- a) **Infrastructure-Based vs. Process-Based Standards:** He suggested that performance standards should be infrastructure-oriented, such as specifying the number of check-in counters allocated per aircraft type (e.g., 3 to 5 counters for an A320), rather than being solely process/time-based. He proposed that process-related standards be consolidated under a single clause for clarity and ease of implementation by airport operators.
 - b) **Realistic Baggage and Passenger Arrival Timelines:** He highlighted a practical challenge at Chennai Airport, where the parking stand is located between two runways, making it impossible for passengers or baggage to reach the terminal within 15 minutes. He suggested that such location-specific constraints be considered while defining arrival journey standards.
 - c) **Aerobridge Allocation and Responsibility:** He reflected on the current approach where aerobridge usage is based on airline request and suggested that the responsibility should lie with the airport operator, as it is a passenger-centric facility. He also sought clarification regarding the calculation of the 90% metric for the aerobridge usage standard and requested AERA to review the suggestions already submitted by AAI on this matter. He pointed out that during night operations, many aircraft are parked at remote bays due to limited aerobridge availability, which should be factored into the standard.
 - d) **Medical Facilities Standard:** He stated that the consultation paper mentions availability of 100% medical facility, but referred to ICAO Annex 9, which mandates only first aid and referral arrangements. He emphasized that airports are not equipped to provide full medical assistance and requested that the standard be aligned with international norms.
13. AERA Member-1 responded to the concern regarding aerobridge allocation, clarifying that:
- a) Airlines currently request either aerobridge or remote bay usage based on their operational preferences.
 - b) Penalizing airports for not providing aerobridge access when it is not requested by the airline would be unjustified.
 - c) The 90% metric is based on the number and nature of airline requests, and any suggestions for improvement are welcome.
14. The Chairperson, AERA emphasized that:

- a) The Performance standards are designed with a passenger-centric approach. While infrastructure constraints and airline preferences are acknowledged, the primary objective remains enhancing the overall passenger experience.
- b) The airport serves as the coordinating entity for service delivery, and all other service providers are expected to align with the standards set for the airport.
- c) Segregating standards based on individual airlines or aircraft types is neither feasible nor practical, especially at large airports and would complicate implementation.

Regarding the medical facilities, the Chairperson, AERA acknowledged the point raised.

15. Mr. S. S. Raju, ED (Ops), AAI continued the discussion. He raised several critical operational and implementation-related concerns, particularly regarding the role of government service providers and the practicality of certain performance standards.

- a) **Compensation for Deficiencies by Government Agencies:** He raised considerations around the feasibility of implementing compensation mechanisms for service deficiencies involving government agencies. He observed that significant outstanding payments already exist and stated that expectations around compensation may differ from those applicable to private service providers operating under SLAs.
- b) **Sample Size and Survey Methodology:** Referring to the $Q = B - A$ formula used in the presentation, ED(Ops), AAI sought clarification on the sample size calculation, which appeared to consider only 42 passengers per week in a single queue. He observed that this was too small a sample to yield statistically valid insights and requested further clarification on how broader passenger feedback would be captured.
- c) **Wheelchair Service Challenges:** He raised a concern about the pre-booked wheelchair service, noting that in some cases, especially with wide-body aircraft up to 75 to 80 wheelchairs may be requested. He sought to understand whether it was realistically possible for airlines or airport operators to meet such high demand consistently.
- d) **Dynamic Airport Environment and Survey Validity:** He emphasized that airport operations are highly dynamic, with frequent emergency situations and downtimes. He sought insights whether surveys conducted during such periods would yield realistic and representative results, and whether the framework accounted for such variability.
- e) **Feedback Collection for Facilities Usage:** He also raised a query regarding the 90% metric for facilities like washrooms and lounges, asking how feedback would be collected. He seeks clarification whether passengers would be voluntarily providing feedback, or if surveyors would be actively engaging with users, and whether it was feasible to capture feedback from all users of a particular facility.

16. The Chairperson, AERA provided clarification on the mentioned issues by stating that:

- a) The compensation mechanism mentioned earlier was in reference to specific services like wheelchair assistance, where the airline is responsible. In case of deficiencies, the airport operator, being the coordinating agency, may seek compensation from the airline.

- b) For government agencies, any limitations or deficiencies would be addressed through the Ministry of Civil Aviation (MoCA), which being the nodal Ministry would pro-actively ensure that such agencies adopt a professional and accountable approach once the Govt. statutorily notifies the said performance standards.
17. Mr. Sachdeva, on behalf of the Authority, responded to the technical queries raised:
- a) On the sample size, he clarified that the example of 42 passengers was for one single queue, and that the assessment would cover multiple queues, with data points scaled according to airport size and traffic volume.
 - b) Regarding wheelchair services, he acknowledged the operational challenges raised by the stakeholder.
 - c) On the 90% metric, he explained that this figure is derived from the sample of passengers surveyed by third-party assessors. Not all passengers use every facility, so the standard applies to the subset of passengers who have used a particular service. The feedback is collected through structured surveys, and the methodology will be refined to ensure representative and reliable data.

2) Adani Airports

18. Mr. Ashu Madan, representing Adani Airports, thanked AERA and its members for the opportunity to present comments on behalf of Adani Group. He also appreciated the detailed presentation and acknowledged the depth of analysis provided. He raised the following key points and suggestions:
- a) **Rebate and Incentive Framework for Third-Party Service Providers:** Mr. Madan stated that while airport services involve multiple stakeholders such as CISF, immigration, ground handlers, and airlines, the current rebate and penalty framework for the said service standards appears to apply only to the airport operator. He suggested that if the standards are to be notified by the Ministry of Civil Aviation, there should be a provision allowing airport operators to enter into formal agreements with third-party service providers, enabling shared accountability and performance-linked mechanisms.
 - b) **Fairness in Rebate and Incentive Structure:** He pointed out that the current structure is skewed, with a 5% penalty and only 1.25% incentive, which is often delayed or can get lapsed. He proposed a more balanced approach, where incentives could be provided in cash to the airport operator for consistently high service quality.
 - c) **CapEx and OpEx Recognition in MYTP:** He emphasized that achieving higher service levels often requires additional capital and operational expenditure, which may not be feasible under current constraints. He requested that such investments be automatically recognized and approved as part of the Multi-Year Tariff Proposal (MYTP) framework, once the rules are notified.
 - d) **Implementation for Airports Without Existing Guidelines:** He raised a concern regarding Delhi and Mumbai airports, which have been operational since 2006 but do not yet have AERA guidelines applicable to them. He sought clarity on how the proposed guidelines would be implemented for these airports and requested further details on this aspect.

- e) **Phased Implementation of Performance Standards:** Mr. Madan suggested a phased rollout of the performance standards over a 2-to-3-year period, especially since many airport operators already conduct internal surveys and monitor service parameters under their concession agreements. He proposed that in the initial phase, existing parameters be adopted by the regulator or third-party assessors, with new standards introduced gradually.
 - f) **Extension of Submission Timeline:** Given the comprehensive nature of the consultation paper and the proximity to the submission deadline, Mr. Madan made a request for a 30 to 45 days extension of the last date of submission to allow for more detailed and thoughtful feedback.
19. The Chairperson, AERA clarified that:
- a) The airport is considered the coordinating entity for service delivery and primary service provider to the users, including passengers and airlines. Therefore, accountability is placed on the airport operator for maintaining the airport as the focal point for services responsibility. However, the suggestions for allowing airport operators to seek reimbursement or compensation for the penalty applicable to airport operator for service deficiencies primarily falling under the responsibility of airline/third party service providers, deserves merit and would be examined for suitably incorporating in the overall framework.
 - b) Regarding the phased implementation, a detailed written justification and comments outlining the implementation over a time period may be submitted to AERA for examining the same.
- 3) Delhi International Airport Limited (DIAL)**
20. Mr. Harsh Gulati, representing DIAL raised two key concerns regarding the proposed performance standards framework, particularly in the context of Delhi Airport's operational and contractual structure:
- a) **Alignment with Existing Concession Agreements:** He pointed out that Delhi Airport's concession agreement includes specific provisions and dispensations across various compensation periods (CP1, CP2, CP3 and CP4). These contractual terms may not align with the proposed performance standards. He requested AERA to carefully review the concession agreement before finalizing the framework to ensure consistency, legal compatibility, and fairness.
 - b) **Sampling Methodology for Performance Measurement:** Mr. Harsh expressed concern over the current sampling approach, which focuses on busiest hours of the busiest days. He cautioned that this could skew results by capturing outlier conditions, rather than typical operational performance. He recommended adopting a broader sampling technique, aligned with international best practices and airport master planning norms, which typically design infrastructure for the 30th or 40th busiest hour, not the absolute peak. He emphasized that measuring only peak conditions could lead to overbuilding and unnecessary capital expenditure.
 - c) **Request for Extension of Submission Timeline:** Given the financial and operational implications of the proposed framework, Mr. Harsh requested a 30 to 45 day extension of the

last date of submission of written inputs to allow DIAL to conduct a thorough review and submit in writing detailed feedback and additional comments.

21. The Chairperson, AERA on the contractual provisions stated that the proposed framework will be addressing all relevant issues in the light of the statutory requirements and the regulatory mandate.

Regarding the sampling methodology, the Chairperson asked DIAL to submit a detailed written note explaining the implications in relation to infrastructure planning and capital expenditure. He ensured that AERA's objective is to develop a balanced and realistic framework that avoids overdesign and unnecessary infrastructure expansion.

On the extension of the submission timeline, the Chairperson noted the request.

4) Bangalore International Airport Limited (BIAL)

22. Mr. Shobhit Agarwal, representing BIAL, began by congratulating AERA for initiating the development of India-specific airport performance standards, recognizing the significance of such a framework for the world's third-largest aviation market. He expressed support for the inclusion of incentives in the proposed model, noting that it would encourage airport operators to enhance service delivery.

However, he raised following concerns and suggestions:

- a) **Methodology for Performance Measurement – Peak Hour Sampling:** Mr. Shobhit highlighted the importance of not relying solely on peak-hour sampling for performance measurement, particularly during festive periods like Diwali or Christmas, when passenger patterns may vary significantly. He explained that airport infrastructure is typically designed for the 30th or 40th peak hour, not the absolute peak. Measuring performance during extreme peak hours could unfairly penalize airports and lead to overbuilding infrastructure for limited high-traffic days. He recommended revisiting this methodology to ensure fairness and practicality.
- b) **Concession Agreement Limitations and Phased Implementation:** He stated that certain concession agreements, including BIAL's, currently include only subjective parameters. He requested a phased implementation of the new performance standards, allowing airports sufficient time to invest in infrastructure and operational upgrades required to meet the new benchmarks.
- c) **Financial Impact of Rebate Mechanism:** He expressed concern over the proposed 5% rebate mechanism, highlighting its potential to cause significant revenue impact for airport operators. He requested that the financial implications be carefully considered and balanced within the framework.
- d) **Request for Extension of Submission Timeline:** Given the complexity and depth of the consultation paper, and the proximity to the submission deadline, Mr. Shobhit made a formal request for a 30 to 45-day extension of the last date of submission of comments to allow BIAL to submit a comprehensive and well-researched response.

23. The Chairperson, AERA acknowledged the concern regarding peak-hour sampling and its impact on airport infrastructure and capital expenditure planning. He invited BIAL to submit a detailed written note explaining this point, along with its implications on infrastructure design and investment. He informed that AERA's objective is to develop a practical and balanced framework that does not lead to overbuilding or inefficiencies.

On the extension of the submission timeline, the Chairperson noted the request.

5) GMR Group

24. Mr. K. Narayana Rao, Director, GMR Group, acknowledged that several points had already been raised by his colleagues, but wished to add a few observations:
- a) He appreciated the concept of uniform performance standards, noting its potential benefits. However, he raised a concern about the use of the term "Rebate", explaining that in certain situations especially during the true up process, it could effectively operate like a penalty rather than adjustment in the tariff. He requested AERA to re-examine the terminology and its implications.
 - b) Mr. Rao also commented on the rebate-to-incentive ratio of 5:1.25, expressing that it may not appear equitable. He requested AERA to review the structure and consider whether the incentive component could be made encashable, to enhance its effectiveness.
 - c) Lastly, he raised a point regarding the role of the third-party assessor. He suggested that if third party agencies conduct surveys independently, there may be discrepancies in data such as passenger numbers or other operational metrics which could potentially lead to disputes or litigation. He requested that any third-party assessments be validated or clarified with the airport operator to maintain accuracy and transparency.

6) Noida International Airport (NIA)

25. Ms. Trisha Bedi, representing NIA expressed appreciation for AERA's initiative to establish uniform Service Level Agreements (SLAs) across major airports. She acknowledged that many of her points had already been covered by other airport operators but emphasized a specific concern relevant to Greenfield airports.

She highlighted that newly developed airports, such as Noida International Airport, require time to stabilize infrastructure, operational processes, and systems before being evaluated against performance standards. She requested AERA to consider granting a grace or moratorium period during the initial months or years of operation to allow for effective stabilization and fair monitoring.

Additionally, Ms. Trisha requested an extension in the deadline for submitting written comments, citing the need for a thorough review of the framework and its implications. She confirmed that Noida International Airport will be submitting detailed feedback in writing.

26. The Chairperson, AERA acknowledged the unique challenges faced by Greenfield airports to adapt to the new framework of performance standards during their initial operational phase and noted the request for a moratorium period. AERA shall examine this aspect for necessary action. On the extension of the submission timeline, the Chairperson noted the request.

7) Airport Director, Pune Airport

27. Airport Director, Pune, raised specific concerns related to the unique operational challenges faced by civil enclave airports, using Pune Airport as a case study.
- a) **Civil Enclave Constraints – Land and Infrastructure:** He highlighted that Pune Airport, despite being categorized as a Category A airport, operates as a civil enclave within a limited area of 42 acres, handling over 10.5 million passengers annually. He pointed out that city-side infrastructure and car parking facilities are severely constrained compared to larger standalone airports, making it challenging to meet certain performance standards.
 - b) **Limited Control Over ATC Operations:** He stated that Air Traffic Control (ATC) at Pune Airport is managed by the Indian Air Force, and the airport operator does not have direct control over ATC-related operations. This limits the ability of the airport to influence certain performance outcomes.
 - c) **Slot Allocation and Terminal Utilization:** He explained that daytime slots are allocated to the Indian Air Force, resulting in low passenger traffic during the day, while night slots are allocated to commercial operations, leading to high passenger density at night. This uneven distribution affects terminal utilization and service delivery.
 - d) **Need for a Separate Category for Civil Enclave Airports:** Based on the above points, he requested AERA to consider creating a separate category for civil enclave airports, recognizing their unique operational limitations for ensuring that performance standards are tailored accordingly.
 - e) **Limited Control Over Other Agencies:** He also raised a concern that airport operators do not have direct control over other agencies working at the airport, which can impact service delivery. He suggested that if provisions could be made to strengthen coordination or oversight, it would help improve compliance with performance standards.

28. The Chairperson, AERA acknowledged the unique challenges faced by civil enclave airports, particularly in terms of watch hours and space constraints, inter-agency coordination, and slot allocation dynamics. He stated that the suggestion for a separate category for civil enclave airports has been noted and AERA shall examine this aspect within the overall performance standards framework.

8) Airport Director – Port Blair Airport

29. Mr. Devender Yadav, APD, Port Blair Airport, highlighted the infrastructural challenges faced in maintaining performance standards at the Port Blair Airport, being a civil enclave and located on an island. The nature and geographical location of the airport present unique logistical and operational constraints that make it difficult to implement all prescribed infrastructure

requirements. He requested AERA to take cognizance of these limitations while evaluating performance parameters applicable to such airports.

30. The Chairperson, AERA acknowledged the concerns raised and stated that AERA will assess how regulatory expectations align with the operational realities of such type of airports.

B. Airlines and Associations

1) Fly Dubai

31. Mr. Abdul Raheem, representing Fly Dubai, thanked AERA for organizing the meeting and extending an invitation to Fly Dubai. He appreciated the structured and well-conducted nature of the consultation and acknowledged the importance of such forums for improving passenger experience and operational efficiency. He raised the following key points for consideration:
- a) **Inclusion of Immigration Clearance in Arrival Journey Parameters:** Mr. Raheem observed that while the arrival journey has been mapped in the performance standards framework, it currently does not include immigration clearance as a parameter. He emphasized that immigration is a critical part of the passenger experience and should be incorporated into the arrival journey metrics.
 - b) **Clarification on Baggage Timelines in Belt-Sharing Scenarios:** He stated that at several metro airports, baggage belts are shared between multiple airlines. In such cases, the current definitions of “first bag” and “last bag” may not accurately reflect the passenger experience. He requested that the framework provide clear guidelines on how baggage delivery timelines should be measured in belt-sharing scenarios.
 - c) **Lost Baggage and Customs Clearance Challenges:** Mr. Raheem highlighted operational challenges faced during lost baggage recovery, particularly in situations involving mass offloading or delayed baggage arrivals. He pointed out that customs clearance for such baggage is often restricted to general working hours, which causes delays in delivery to passengers. He recommended that the framework consider mechanisms to minimize the impact of such delays, ensuring a more seamless experience for passengers even in exceptional cases.

He concluded by reiterating Fly Dubai’s commitment to enhancing passenger satisfaction and thanked AERA once again for the opportunity to present these concerns.

32. The Chairperson, AERA acknowledged the points raised, particularly regarding immigration clearance, baggage handling in belt-sharing scenarios, and customs-related delays in lost baggage recovery and stated that the same shall be examined by AERA for appropriate action.

2) Air India Express

33. Mr. Sunil Joshi, representing Air India Express, raised a concern regarding the provision of medical facilities at Port Blair Airport. He stated that it would not be feasible to establish 100% medical facilities at the airport, considering it operates as a civil enclave and has inherent infrastructural limitations.

Mr. Joshi further requested that AERA should ensure consultation with airlines prior to implementing any parameters or standards that directly impact airline operations.

34. The Chairperson, AERA acknowledged the concern raised by Mr. Joshi and stated that AERA always remains committed to engaging with all relevant stakeholders, including airlines, during the formulation and implementation of performance standards and its regulatory framework and today's stakeholder consultation meeting has been accordingly organized by inviting all stakeholders including airlines so as to get their first-hand inputs/comments/suggestions for finalizing this framework.

3) Federation of Indian Airlines (FIA)

35. Mr. Ujjwal Dey, representing FIA, began by thanking the Chairperson and AERA for organizing this important stakeholder consultation meeting. He appreciated the authority for preparing a detailed and comprehensive framework, which he acknowledged covers all major touchpoints, including those relevant to airline operations.

He stated that since the framework involves multiple service providers, especially airlines, FIA would require additional time to thoroughly review the document and its implications. He formally requested an extension of the deadline for submitting written comments and confirmed that FIA will be submitting detailed feedback in writing.

36. On the extension of the submission timeline, the Chairperson noted the request.

4) International Air Transport Association (IATA)

37. Mr. Dermot Casey, representing IATA, raised a specific concern regarding the inclusion of check-in processes within the rebate mechanism of the proposed performance standards framework. He argued that airlines already operate efficiently in this area due to competitive pressures and market dynamics, and therefore, check-in should not be part of rebate-linked parameters. He cautioned that this could misrepresent airport performance and unfairly penalize airlines for factors beyond their control.
38. Another representative from IATA, Mr. Amitabh Khosla commended AERA for initiating the development of a comprehensive framework for airport service quality standards, noting its importance given that passengers directly fund infrastructure through user charges. He appreciated the work done by the Authority and acknowledged that the framework addresses a long-standing gap in AERA's legislative mandate.

He raised the following key concerns and suggestions:

- a) **Appropriateness of Incentive Mechanism:** Mr. Khosla questioned whether it is appropriate to offer incentives for service levels that passengers are already paying for through existing airport charges. He suggested that the framework should carefully evaluate how incentives are distributed across service areas, cautioning that overperformance in one area could mask underperformance in another, given the interlinked nature of airport processes.

- b) **Involvement of Government Agencies:** He stressed the importance of involving government agencies such as security, customs, and immigration in the performance standards framework, as they play a critical role in shaping passenger experience.
- c) **Infrastructure Quality and Resilience:** Mr. Khosla highlighted the need to include infrastructure quality in the performance standards. He cited past incidents where poor asset maintenance led to passenger inconvenience and proposed that AERA consider mandating infrastructure quality audits and resilience metrics, such as structural integrity, flood-proofing, and fire safety. He also recommended public disclosure of failures and corrective actions to ensure transparency and accountability.

He concluded by stating that IATA will be submitting detailed written feedback on the proposed framework.

39. The Chairperson acknowledged the concern regarding the inclusion of check-in processes in the rebate mechanism, especially in light of the airline–airport interface and operational responsibilities. However, the entire performance standards framework is based on the foundation that Airport being the Nodal entity and hub for all the stakeholders including airlines and passengers, hence the primary responsibility for services and services quality directly or indirectly provided at the airport rests on the concerned airport itself. He appreciated the emphasis on passenger-funded infrastructure and stated that the incentive structure is designed to reward genuine service improvements without duplicating what is already expected. The Chairperson also acknowledged the importance of inter-agency coordination and clarified that AERA is actively engaging with MoCA/government stakeholders for their active onboarding in the overall performance standards framework so as to ensure a holistic and integrated framework.

AERA noted the suggestion on audits and resilience metrics for enhancing passenger safety and service reliability.

C. Other Regulatory/Industrial Bodies

1) Directorate General of Civil Aviation (DGCA)

40. Mr. C.M. Pandey, representing DGCA, informed the Authority that DGCA has already submitted written comments on the proposed framework. In addition to the written feedback, he raised the following three specific points for consideration:
- a) **Inclusion of Damaged Baggage as a Performance Parameter:** Mr. Pandey stated that while the framework includes parameters for baggage delivery and lost & found services, it does not include any metric for damaged baggage. He suggested that a dedicated parameter be introduced to monitor and address incidents of baggage damage.
 - b) **Parameter Disparity Between Category A and Category B Airports:** He observed that Category B airports have fewer performance parameters compared to Category A airports. He questioned whether this implies an acceptance of degraded performance standards for Category B airports and urged AERA to ensure equitable expectations across airport categories.
 - c) **Operational Resilience Parameter for All Airport Categories:** Mr. Pandey emphasized that operational resilience is critical for all airports, regardless of category. He recommended that

this parameter be uniformly applied to both Category A and Category B airports to ensure consistent service reliability.

41. The Chairperson, AERA acknowledged the comments given by DGCA and stated that AERA will review the inputs shared.

2) Bureau of Civil Aviation Security (BCAS)

42. Mrs. Chandan Chowdhary, representing BCAS, informed the Authority that BCAS has already submitted written feedback pertaining to the proposed framework. She thanked AERA for facilitating the consultation and confirmed that BCAS inputs have been shared for consideration.

3) Construction Industry Development Council (CIDC)

43. Mr. Deepak Majumder, representing CIDC, expressed his appreciation for the opportunity to participate in the consultation and acknowledged the quality of the presentation delivered. He shared several observations and suggestions based on CIDC's extensive experience in providing third-party services across infrastructure sectors for over two decades. His key points were as follows:

- a) **Infrastructure Rating System:** Mr. Majumder emphasized the need for a structured rating mechanism for airport infrastructure, similar to existing models used in other sectors. He suggested that each parameter—both subjective and objective—presented in the consultation should be rated to ensure transparency and accountability.
- b) **Capacity Building and Training:** He highlighted the importance of capacity building across all personnel involved in airport operations. He recommended that comprehensive training programs be instituted to enhance service delivery and operational efficiency.
- c) **Maintenance and Utility Management:** Citing examples such as non-functional toilets, Mr. Majumder stressed the need for robust maintenance protocols to ensure that facilities remain operational and user-friendly.
- d) **Baggage Handling Efficiency:** He pointed out that baggage retrieval post-travel often takes 45 minutes to an hour and suggested that this process be reviewed and optimized to reduce passenger wait times.
- e) **Security Screening Improvements:** Mr. Majumder proposed that all baggage—including small carry-ons—be screened prior to entering the airport security zone. He stated that this could potentially streamline the security process and save time.
- f) **Last-Mile Connectivity:** He raised concerns regarding the lack of efficient transportation options from the airport to nearby metro stations, which often require a 1–1.5 km walk and take up to 30 minutes. He recommended exploring solutions to improve last-mile connectivity for passengers.

Mr. Majumder also thanked AERA for the comprehensive presentation and reiterated that the suggestions were intended to support and strengthen the framework being developed.

44. The Chairperson, AERA acknowledged the points raised and stated that AERA will examine the suggestions for appropriate action.

4) Business Aircraft Operators Association (BAOA)

45. Group Captain R. K. Bali, representing BAOA, thanked AERA for initiating this crucial consultation on performance standards for Indian airports and appreciated the comprehensive presentation. He emphasized that General Aviation (GA) and Business Aviation (BA) are vital enablers of regional connectivity, emergency services, corporate mobility, and the integration of advanced air mobility. Accordingly, he recommended that performance standards must also encompass GA/BA infrastructure and services to ensure balanced growth across the aviation ecosystem. His specific observations and recommendations were as follows:

- a) **Inclusion of GA/BA Facilities in Performance Parameters:** The current framework primarily addresses passenger terminals. Group Captain Bali suggested that GA/BA terminals and operations—including parking, ground handling, hangars, and MRO support—should be incorporated into the objective parameters.
- b) **Operational Standards for GA/BA Flights:** He recommended that GA/BA terminals must ensure proper allocation of parking, access, and ground support services for GA/BA flights.
- c) **Slot Allotment System:** A transparent, online, first-come-first-serve slot allotment mechanism should be implemented for GA/BA operations. He emphasized the need for a fair and equitable ratio of slots for non-scheduled GA/BA operations, comparable to scheduled operations.
- d) **Global Benchmarking:** Referring to international practices in countries like the UK and Malaysia, he stated that their service quality schemes explicitly include business aviation services. He advocated for India to adopt a similar integrated model backed by minimum support standards for all airport users.
- e) **Expanded Scope and Independent Audits:** He proposed that the scope of performance standards be expanded to include GA/BA terminals, hangars, MRO, and associated services. Tailored service parameters should be defined for GA/BA operations, including parking, fueling, and ground handling. Independent audits should be conducted to ensure transparency and service quality.
- f) **Financial Incentives and Penalties:** Group Captain Bali recommended incorporating financial incentives and penalties applicable to GA/BA facilities as part of the regulatory framework.

He concluded by reiterating that BAOA has already submitted detailed feedback and supporting information and expressed confidence that further action would be taken following the consultation.

5) Grahak Bharti - an Airport Services Consumers' Association under "Council for Protection of Rights"

46. Mr. Vinodji Tiwari, representing Grahak Bharti, made a detailed and structured submission raising legal, procedural, and policy-level concerns regarding the ongoing exercise of formulating performance standards for major airports. He began by acknowledging the importance of the

consultation and thanked AERA for the opportunity to present his views. He highlighted the following key points:

- a) **Statutory Framework and Legal Mandate:** Mr. Tiwari referred to the Airports Economic Regulatory Authority of India Act, 2008, specifically Chapter III and Section 13(1)(d), which outlines the Authority's function to monitor performance standards relating to quality, continuity, and reliability of service. He emphasized that this function is conditional upon the prescription of statutory rules by the Central Government under Section 51(2)(f).
 - b) **Absence of Notified Rules:** He pointed out that, as of date, no rules have been prescribed or notified by the Central Government under Section 51, nor have they been laid before Parliament as mandated under Section 53 of the Act. In his view, this renders the current exercise of formulating performance standards legally untenable and void, as the Authority lacks the statutory backing to undertake such functions in the absence of these rules.
 - c) **Urgent Request to Pursue Rule Notification:** Mr. Tiwari urged AERA to actively pursue the Central Government for the expeditious notification of statutory rules, which have been pending since 2009. He stated that several provisions of the Act remain unenforceable due to this delay.
47. The Chairperson clarified that, in accordance with the statutory provisions of the AERA Act, the AERA and Ministry of Civil Aviation have the legal basis and sanctity to initiate the process for notifying the statutory rules required for the formulation of performance standards.

6) UPES University

Representative: Mr. Vippan Raj Dutt

48. Mr. Vippan Raj Dutt addressed the consultation and thanked AERA for organizing the meeting and providing a platform for academic and industry stakeholders to contribute. He shared a set of three key observations related to service quality measurement, resource adequacy, and capacity constraints at airports:
- a) **Multiple Service Providers and Accountability:** Mr. Dutt raised a query regarding the computation of service quality parameters in scenarios where multiple service providers are involved, such as CISF, ground handlers, and other agencies. He asked how performance-linked incentives or rebates would be accounted for when services are delivered by different entities, some of which may not be directly under the airport operator's control.
 - b) **Adequacy of Resources and Cost Implications:** He emphasized that optimum resource provisioning is essential to maintain service quality. In cases where resources are inadequate—whether manpower, equipment, or infrastructure—service delivery suffers. He asked who would be responsible for ensuring adequate resources and how the cost of provisioning such resources would be managed, especially considering that AERA has already fixed charges for various services.
 - c) **Passenger Volume vs. Airport Capacity:** Mr. Dutt pointed out that passenger volumes at many airports are exceeding their design capacity, leading to deterioration in service quality.

He stated that building new terminals or expanding infrastructure takes time and asked how service quality would be maintained during periods of capacity bottlenecks.

He requested that these observations be considered in the formulation of performance standards and thanked the Authority for the opportunity to contribute.

49. The Chairperson, AERA acknowledged the complexity involved in managing service quality across multiple service providers, including both government and private entities. He clarified that:
- a) Independent service providers at the airport operate under Service Level Agreements (SLAs) with the airport operator, which include provisions for maintaining adequate resources and meeting performance benchmarks.
 - b) Government agencies such as CISF, Customs, and Immigration follow a systematic protocol based on workflow analysis and peak-hour demand. These agencies ensure that adequate manpower and facilities are deployed during critical time slots to maintain required service standards.
50. The Director Tariff further added that while there are multiple service providers at airports, entities such as Ground Handling and Cargo operators function under separate service agreements. These agreements define their scope of work, performance expectations, and accountability mechanisms.

D. Passenger / Public Representative

1) Rajat Gupta

51. Mr. Rajat Gupta, a frequent flyer, began by congratulating AERA for their detailed and well-structured presentation. He raised a specific concern regarding the sampling methodology for subjective parameters, particularly the passenger survey component.

He pointed out that the presentation mentioned a sample size of 400 passengers for survey-based feedback. He questioned the fairness and statistical validity of this number, especially in the context of large airports handling over 6 million passengers annually. He stated that such a small sample would represent less than 0.01% of the total passenger base, potentially leading to skewed results and misrepresentation of the broader passenger experience.

Mr. Gupta further highlighted a scenario where a single delayed flight or poor airline staff behavior could disproportionately influence the survey outcome if the sample size is too small. He emphasized the need for a robust, representative, and unbiased sampling mechanism to ensure that passenger feedback is accurately captured and reflected in performance assessments.

52. The Chairperson, AERA clarified that the figure of 400 passengers was merely illustrative, used for explanation purposes during the presentation. It is not a finalized number, and the actual sample size will be determined based on statistical principles and operational feasibility to ensure meaningful and representative feedback. He further indicated that the final methodology is intended to reflect diverse passenger experiences across different segments and airport types.

53. Mr. Jodhbir Sachdeva, on behalf of the Authority, further clarified the sampling methodology. He explained that:

- a) The sample size will be determined based on population size and statistically significant sampling techniques at a defined confidence level.
- b) The survey will be conducted using a random sampling approach to eliminate bias and ensure coverage across all relevant passenger segments.
- c) While the initial sample size may appear limited, systematic checks and balances will be incorporated to ensure authenticity and reliability of the data.
- d) Over time, the framework will evolve to include automated data capture systems, such as queuing time trackers and digital feedback tools, which will enhance the accuracy and scalability of passenger experience measurement.

He emphasized that while current systems may have limitations, the long-term vision includes technology-driven enhancements to ensure robust and unbiased feedback collection.

2) Air Cargo Business, Ahmedabad

54. Mr. Chinmay Kothari, representing Air Cargo Business, introduced himself as a second-generation entrepreneur and an active participant in the air cargo business in Ahmedabad. He appreciated the detailed and well-articulated presentation focused on passenger services and acknowledged the efforts made by AERA and its consultants.

He raised a key concern regarding the air cargo sector, noting that while the current consultation focused on passenger services, there are numerous ongoing issues with cargo custodians, for whom AERA also regulates tariffs. He emphasized that the cargo sector faces persistent grievances, and there is a pressing need for a formal grievance redressal mechanism specifically for air cargo stakeholders.

Mr. Kothari recommended that such a mechanism be established at the Ministry level, allowing cargo operators and agents to represent their concerns and suggestions in a structured and transparent manner. He stressed that the cargo sector is a critical part of airport operations and deserves equal attention in regulatory consultations and performance frameworks.

55. The Chairperson, AERA acknowledged the points raised and clarified that the current session focuses on passenger-related performance standards. The cargo sector is also included in AERA's broader regulatory roadmap. He invited Mr. Kothari to share any specific suggestions in writing for future discussions on performance standards for the cargo segment. It was acknowledged that the concerns of cargo stakeholders form part of the broader context for ongoing consultations.

3) Delhi Customs Brokers Association (DCBA)

56. Mr. Devendra Singh Bhadoria, representing DCBA, raised a strong concern regarding the lack of focus on cargo-related matters in the current consultation paper. He emphasized that air cargo plays a vital role in airport operations and contributes significantly to the economy, generating crores of rupees in business daily.

57. The Chairperson, AERA clarified that: -

- a) Under the AERA Act, 2008, the Authority is mandated to set and monitor performance standards across airport services.
- b) While separate concession agreements exist for different airports, efforts are underway to work towards greater uniformity in standards over time.
- c) In the initial phase, the focus has been on airport performance standards directly impacting the travelling passengers who majorly fund the airport infrastructure and cargo-specific standards are expected to be taken up in subsequent phases.

The Chairperson also mentioned that AERA recently held a comprehensive discussion with cargo stakeholders to understand their various issues and also to simplify the cargo tariff card, and many of the points raised by DCBA are already under active consideration. He also mentioned that some of the objective parameters related to Cargo Dwell Time has been kept under Information Gathering for monitoring the performance of the Cargo Service Providers.

4) Market Insight Consultants

58. Mr. Sanjay Nagi, representing Market Insight Consultants, began by commending AERA for initiating the development of a robust and India-specific framework for airport performance standards. He stated that while the model itself was well-conceived, his concern was focused on the independence and selection process of third-party assessors, who will be responsible for monitoring and evaluating airport performance.

He emphasized the need for transparent and impartial selection of these assessors to ensure credibility and fairness in the evaluation process. Specifically, he raised the following queries:

- a) Will the selection of third-party assessors be conducted through a public tender process?
- b) Will the selection follow a Quality and Cost-Based Selection (QCBS) mechanism or a simpler alternative?
- c) Will there be clear guidelines and criteria to ensure independence and objectivity in the assessment process?

Mr. Nagi suggested that providing clarity on these aspects would enable stakeholders like his organization to offer more informed and constructive suggestions. He concluded by once again appreciating AERA's efforts in initiating this important regulatory framework.

59. The Chairperson, AERA acknowledged the importance of ensuring transparency and independence in the selection of third-party assessors. He remarked that credibility and fairness are intended as guiding considerations for AERA's monitoring process, and that options for the assessor selection process and mechanism as per the extant guidelines are being explored with these principles in mind.

The Chairperson encouraged stakeholders to share written suggestions on this to help the development of a transparent, objective and effective selection process.

5) Freedom of Movement Coalition

60. Ms. Vaishnavi, representing Freedom of Movement Coalition, raised a series of critical concerns regarding accessibility for passengers with reduced mobility (PRM), particularly those requiring wheelchair assistance. She emphasized the need for a more inclusive and responsive framework that reflects the realities faced by PRM passengers across Indian airports. Her key points included:
- a) **Arbitrary Capping of Wheelchair Passengers:** Ms. Vaishnavi cited a recent incident where only three wheelchair passengers were allowed per flight, questioning the basis and fairness of such limitations. She stressed that this practice is discriminatory and lacks transparency.
 - b) **Continuous Wheelchair Support and Infrastructure Needs:** She highlighted the need for continuous assistance, including support up to the aircraft seat, and stated that passengers fall under categories such as WCH (wheelchair to aircraft) and WCC (wheelchair to climb steps). These categories require aero bridges or ramps, which are often unavailable or unused due to structural constraints, as seen in a case at Mumbai Airport.
 - c) **Infrastructure Barriers:** Ms. Vaishnavi flagged accessibility gaps at airports, including the absence of ramps at certain gates in Delhi's Terminal 3 and inadequately designed toilets for disabled passengers. She urged AERA to ensure that infrastructure meets universal design standards.
 - d) **Security Screening for PRM Passengers:** She proposed streamlining security checks for wheelchair users by installing wider X-ray machines and creating dedicated queues, to reduce discomfort and delays.
 - e) **Improved Data Collection and Recognition of Mobility Needs:** Ms. Vaishnavi emphasized that many elderly or mobility-impaired individuals do not identify as disabled but still require assistance. She advocated for better data collection on passengers using wheelchairs and buggies, to ensure services are appropriately scaled and delivered.
 - f) **Call for Inclusion and Awareness:** She urged AERA to challenge prevailing misconceptions and ensure that accessibility concerns are integrated into the performance standards framework and are not treated as secondary or optional.

Ms. Vaishnavi concluded by stating that the Freedom of Movement Coalition will submit a detailed written representation, and thanked AERA for the opportunity to raise these concerns.

61. The Chairperson, AERA acknowledged the wide-ranging accessibility issues raised and emphasized that AERA is committed to ensure that the performance standards framework is inclusive and responsive to the needs of PRM passengers. He further requested the Freedom of Movement Coalition to submit detailed written comments for examining the concerns thoroughly and appropriately.

6) Air Travelers Association (ATA)

62. Mr. Satendra Singh, representing ATA, raised foundational concerns regarding the financial and legal structure underpinning airport charges and passenger rights. Drawing from his long-standing experience in the civil aviation sector, he traced the historical evolution of airport funding, noting that aerodromes were previously maintained by the government, with costs recovered from airlines. Over time, with privatization and the establishment of regulatory bodies like AERA, the financial burden shifted to passengers through mechanisms such as the User Development Fee (UDF).

He raised the following key points:

- a) **Lack of Legal Provision for Passenger Refunds:** Mr. Singh questioned the absence of a legal mechanism that mandates refunds or compensation to passengers when airports fail to meet performance standards. He cited provisions under OMDA, where penalties for non-compliance are paid to the government, not to the passengers who bear the cost. He urged AERA to consider a framework where penalties are redirected to passengers, thereby aligning financial accountability with passenger rights.
- b) **Cost of Monitoring and Financial Burden on Passengers:** He expressed concern over the cost of implementing digital and third-party monitoring systems, emphasizing that these expenses would ultimately be passed on to passengers. He advocated for a model where such investments are justified by tangible returns to passengers, and where penalties for non-compliance (e.g., 4% of airport revenue) are used to compensate passengers directly.
- c) **Need for Legal Clarity and Passenger-Centric Enforcement:** Mr. Singh stressed the importance of legal clarity in the framework and called for passenger-centric enforcement mechanisms that ensure accountability and transparency in service delivery.

He concluded by reiterating the need for a regulatory approach that protects passenger interests, both financially and operationally.

63. The Chairperson, AERA clarified that the proposed rebate and incentive mechanism for monitoring performance/service quality standards is in line with the standard mechanism under implementation in various airports globally and has the statutory backing as per the provisions of the AERA Act. However, it was highlighted that the proposed framework of ours is fundamentally passenger-centric with very clear provisions to rationalize/reduce the User Development Fee (UDF) in case of underperformance, thereby providing direct financial benefit to passengers. He reiterated that the framework is fundamentally designed to protect passenger interests while maintaining legal and operational integrity and welcomed further suggestions in writing from the Air Travelers Association.

7) Air India Airport Services Limited (AIASL)

64. Mr. Amit Mishra, representing AIASL, acknowledged that many relevant points have already been raised by other stakeholders. He added specific operational concerns from the perspective of ground handling and apron-side services:
- a) **Compliance with DGCA Regulations – Airport Driving Permits (ADPs):** Mr. Mishra emphasized the importance of ensuring that Ground Support Equipment (GSE) operators driving vehicles on the apron possess valid Airport Driving Permits (ADPs), as mandated by DGCA regulations. He suggested that breathalyzer tests, currently conducted by airlines or Ground Handling Agents (GHAs), should be made the responsibility of airport operators to ensure uniform compliance across all service providers.
 - b) **Differentiated Baggage Delivery Time Standards:** He recommended that baggage delivery time standards be differentiated based on remote bays versus contact stands, as operational realities vary significantly between the two. He proposed that sampling and data structures be adjusted to reflect these differences for more accurate performance measurement.

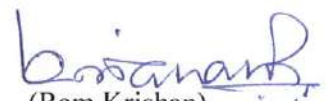
- c) **Pushback Equipment Availability for Diversions and Aircraft Types:** Mr. Mishra highlighted that aircraft diversions and the presence of varied aircraft types often require specific pushback equipment (towbars), which may not always be available with GHAs. He recommended that airport operators be mandated to maintain a minimum inventory of such equipment, based on the permitted aircraft codes at their airport, to ensure operational readiness.

He concluded by stating that further comments will be submitted in writing by AIASL.

65. The Chairperson, AERA acknowledged the points raised and stated that AERA shall duly examine these issues for taking appropriate measures while finalizing the performance framework.

E. Conclusion

66. The Chairperson, AERA in his concluding remarks thanked all the stakeholders for their active participation and stated that the deliberations during the Consultation Meeting were very insightful and comprehensive. AERA has taken note of all the comments and issues raised by various stakeholders. He requested all stakeholders to submit within the stipulated time, their written comments, feedback, and any also additional issues, identified independently and could not be raised during the meeting so as to enable a comprehensive review of all inputs.


(Ram Krishan)

Director (Tariff)

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