



Lakshmikumaran
& Sridharan
attorneys

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I. REGULATIONS CHECK

Revisiting the Chicago Convention

INTRODUCTION



Keeping focus on the growth of the Indian civil aviation sector and to create an ecosystem that can propel domestic & international ticketing, boost regional connectivity and simultaneously ensure safety, the Ministry of Civil Aviation (“**MoCA**”) has released the Civil Aviation Policy (“**NCAP 2016**”) that ensures these aspects. Though the first draft of NCAP was presented way back in November 2014 and thereafter revised in October 2015 inviting public comments, the final NCAP 2016 was released in June 2016 after incorporating comments received from stakeholders. NCAP 2016 aims to provide an environment for the harmonised growth of various aviation sub-sectors, i.e. Airlines, Airports, Cargo, Maintenance Repairs and Overhaul services (MRO), General Aviation, Aerospace Manufacturing, Skill Development, etc. It also proposes to simplify and make systems and processes affecting this sector more transparent with greater use of technology without compromising on safety and security. The basic reason to push for aviation sector is its large multiplier effect in terms of investments, tourism and employment generation, especially for unskilled and semi-skilled worker.

Crucial aspects of the NCAP 2016

A. Regional Connectivity

The Regional Connectivity Scheme (“**RCS**”) will come into effect in Q2 of 2016-17. MoCA intends to target an indicative airfare of Rs. 2,500 per passenger for a distance of 500 - 600 kms on RCS routes, which would be equivalent to about one-hour flight. The cap for helicopters under RCS will be higher. This has been proposed to be implemented by way of: **(i)** Revival of un-served or under-served airports/routes; **(ii)** Concessions by different stakeholders; **(iii)** Viability Gap Funding (**VGF**) for operators under RCS; and **(iv)** Cost-effective security solutions by Bureau of Civil Aviation Security (“**BCAS**”) and state governments.

Revival of un-served or under-served airports/routes would be based on demand, at an indicative cost of Rs. 50 - 100 crores without insisting on its financial viability, on the willingness of state government and exploring on possible models of development of proposed no-frill airport, on the willingness of states to reduce VAT on Aviation Turbine Fuel (“**ATF**”) at these airports to 1% or less for a period of 10 years and providing land free of cost and free from all encumbrances and also provide multi-modal hinterland connectivity (road, rail, metro, waterways, etc.) as required.

As far as concessions are concerned, it is proposed that for up to 10 years from the date of commencement of flight operations under RCS no airport charges would be levied for operations and landing, parking and Terminal Navigation Landing charges (**TNLC**) shall be waived and Route Navigation and Facilitation charges (**RNFC**) will be levied on a nominal basis. Service tax on tickets will be levied on 10% of the taxable value (abatements of 90%) of tickets for passengers embarking from or terminating in an RCS airport, without any input credits for an initial period of 1 year

from the date of commencement of operations of the RCS airport as notified by MoCA. State government will provide police and fire services free of cost and power, water and other utilities will be provided at substantially concessional rates. Self ground handling by airlines will be allowed for operations under RCS at all airports. Excise duty at a rate of 2% shall be levied on Aviation Fuel drawn by operators from the RCS airports for an initial period of three years from the date of notification. VGF indexed to ATF prices and inflation will be provided for a particular route, on a competitive bidding basis if necessary, for a period up to 10 years from commencement of operation by an airline.

VGF will be shared between MoCA and the state government in the ratio of 80:20 (90:10 for NE states) and its payment will be made to the airline operator from the Regional Connectivity Fund (**RCF**), which in turn, will be funded by a levy by the government under Section 5(2)(ab) of the Aircraft Act 1934 and at such rate as decided by the MoCA. The RCF will be collected and operated by AAI or any other entity identified by MoCA.

Up to 10 years from the date of commencement of cargo operations at the RCS airports, for the air freighters, there will be no airport charges levied for operations under RCS and TNLC shall be waived and RNFC will be levied on a nominal basis. Excise Duty on ATF drawn by cargo operators from the RCS airports shall be at the rate of 2% for a period of 3 years from the date of notification. However, Cargo operators will not be entitled to VGF. Continuance of VGF for a particular route will be subject to appropriate Passenger Load Factor continuously for a prescribed period and subject to review after 3 years. Prioritisation of routes will be carried out and reviewed from time to time so that there is balanced growth of regional connectivity in different parts of the country.



B. Safety

The focus of aviation safety would be on pre-empting and preventing accidents/ incidents and safety violations would be treated with zero-tolerance. DGCA would strive to create a single-window system for all aviation related transactions, queries and complaints and fully automated services by implementing eGCA project. DGCA would implement State Safety Programme (SSP) and develop State Safety Plan periodically. A State Safety database would be developed to act as a basis for identification of safety risks. DGCA will carry out a review of all Civil Aviation Requirements (CARs) as and when required on need basis and at least once every 5 years starting from FY 2016-17.

C. Air Transport Operations: Commercial

Though in respect of non-commercial operations, existing provisions shall continue, MoCA will promote growth of civil air transport operations with a focus on regional connectivity with categorization of the commercial air transport into three main categories. Entry pre-requisites in terms of equity and number of aircraft as well as certification and operating regulations would be graded depending upon the size of aircraft and complexity of operations with greater flexibility being provided to commuter and smaller aircraft. The categorization for commercial operations will be as follows:

- (i) **Scheduled Air Transport Operator** (Domestic and International operations)
- (ii) **Scheduled Commuter Operator** – will operate with aircraft having a maximum All Up Weight (AUW) not exceeding 40 tons.
- (iii) **Non- Scheduled operator**

D. Route Dispersal Guidelines (RDG)

RDG was introduced in 1994 to provide air connectivity to remote locations including, J&K, NE Region, Andaman & Nicobar Islands, Lakshadweep, Tier-2 and Tier-3 cities, by way of internal cross-subsidy by airlines using their revenues on the Trunk Routes (12 in number). It is proposed that Category I routes will be rationalised once in 5 years, by adding more routes based on transparent criteria. The criteria proposed for a Cat I route are a flying distance of more than 700 km, average seat factor of more than 70% and annual traffic of 5 lakh passengers over two full schedules (i.e. summer and winter), based on information available with DGCA. The traffic to be deployed on Cat II and IIA routes expressed in terms of a percentage of CAT I traffic will remain the same. For CAT III routes, the percentage will be 35% of CAT I traffic in view of the fact that RCS is being implemented for a similar purpose. For the purpose of meeting the RDG requirements, the Scheduled airlines (both Air Transport Operator and Commuter Operator) will be permitted to trade Available Seat kilometres of helicopters and other small aircraft (maximum AUW not exceeding 40 tons) operating under RCS to extend the last mile connectivity seamlessly to under-served or un-served areas.

E. 5/20 Requirement for International Operations

In October 2004, the Union Cabinet stipulated that for Indian carriers to fly abroad, they must fly on domestic routes for 5 years and have a fleet of 20 aircraft. NCAP 2016 has modified the requirement for 5/20 and all airlines can commence international operations provided that they deploy 20 aircraft or 20% of total capacity (in term of average number of seats on all departures put together), whichever is higher for domestic operations. For this purpose, the published schedule of airlines will be the basis for monitoring, assuming that one aircraft would have six departures per day.

F. Bilateral traffic rights

Pursuant to Chicago Convention 1944 that mulls for Air Service Agreements (ASA), India has ASA with 109 countries covering aspects relating to the number of flights, seats, landing points and code-share. The government will enter into an "Open sky" ASA on a reciprocal basis with SAARC countries and countries with territory located entirely beyond a 5000 km radius from New Delhi. Unlimited flights above the existing bilateral rights will be allowed directly to and from major international airports within the country as notified by MoCA from time to time. ASA will also be amended to allow operators to undertake scheduled international operations overcoming the 'Substantial Ownership and Effective Control (SOEC)' clause in the ASA.

G. Code Share Agreements (CSA)

A Code-Share Agreement between two airlines allows one airline (Marketing airline) to sell seats on a flight operated by another airline (Administrating airline), with the airline code and flight number of the marketing airlines. This helps in seamless connectivity for passenger. In this regard, domestic codeshare Points in India shall be liberalised within the framework of the ASA. Indian carriers will be free to enter into domestic code-share agreements with foreign carriers to any point in India available under the respective ASA. For the designated carriers of India, international codeshare arrangements with foreign carriers will be liberalized as per the provisions relating to code-share arrangements in the ASA, and no prior approval from MoCA will be required. A review will be carried out as and when required on need basis and at least once in 5 years to consider the requirement of further liberalization in code-share agreements.

H. Infrastructure

MRO, ground handling, cargo and ATF infrastructure facilities collocated at an airport, (including heliport licensed by DGCA) are covered under the 'Harmonised List of Infrastructure and will get the benefit of 'infrastructure' sector. MoCA will continue to encourage development of airports by the state governments or the private sector or in PPP mode.

I. Air Navigation Services (ANS)

With the launch of GAGAN, India has become the fourth country in the world to use satellite-based navigation system. All aircraft being registered in India from 1st Jan 2019 will mandatorily have to be GAGAN enabled. AAI will explore opportunities to incentivise the airlines by way of concessions in ANS charges for getting their existing aircraft retrofitted with GAGAN receivers. AAI proposes to provide a fully harmonised Air Navigation System considering ICAO's Global Air Navigation Plan, Aviation system Block Upgrade, Modern performance based technologies and procedures. ANS' training institute – CATC Allahabad – will be developed into a world-class training centre for ANS professionals for the Indian and global market.

J. Aviation Security, Immigration and Customs

MoCA will develop non-legal and indicative service delivery modules for aviation security, immigration, customs, quarantine officers etc. Global best practices in IT, passenger check-in, baggage handling, mobile phone based boarding passes, security checking procedures, immigration and customs etc. will be introduced after due security vetting keeping the Indian context in mind. The government will review and appropriately modify the AVSEC order 5/2009 on deployment of airline security personnel.

Facilities for government agencies like CISF, immigration, customs, police etc. will be arranged for by the government on payment basis, except for items to be billed to Passenger Service Fees or those covered under Handling of Cargo in Customs Area Regulation 2009 and CISF Act. No cost will be levied on the airport operator. The government wants to encourage use of private security agencies at airports for non-core security functions which will be decided in consultation with MHA. The private security agencies will be registered under the 'PASARA (Private Security Agencies (Regulation) Act, 2005) and will also be separately accredited by BCAS. Training and testing of the private security personnel will be carried out by CISF on payment basis. Security auditors of BCAS will carry out regular and surprise audits with the power to penalize and blacklist the errant agencies.

K. Helicopters

Helicopters play a key role in remote area connectivity, intra-city movement, tourism, law enforcement, disaster relief, search and rescue, emergency medical evacuation, etc. The government proposes to provide separate regulations for helicopters and facilitate development of at least 4 heli-hubs initially, across the country to promote regional connectivity. MoCA will coordinate with MoF, MHA, NHAI, Indian Railways, insurance companies, hospitals, Pawan Hans Limited and other helicopter operators to facilitate Helicopter Emergency Medical Services (HEMS). DGCA will bring out Regulations exclusively for HEMS. No landing charges and RNFC will be levied for HEMS operations. A separate helicopter cell will be created in DGCA. The Ministry of Defence, through the Air Force, will create a system whereby expeditious air defence clearance may be granted.

L. Charter operations

The government intends to liberalise international charter operations by revising policy regarding International Charter Operations to include more categories of passenger charter flights recognised globally, marketing rules, geographical and route identification, capacity control etc.

M. Maintenance, Repair and Overhaul (MRO)

MCAP 2016 proposes to develop India as an MRO hub in Asia and attract business from foreign airlines. For this, the tools and tool-kits used by the MRO have been exempted from customs duty on the basis of list the tools and tool kits certified by the DGCA approved Quality Managers of aircraft maintenance organisations. To enable economies of scale, the restriction of one year for utilisation of duty free parts has been extended to three years. To allow import of unserviceable parts including aircraft components like engines and landing gears by MROs for providing exchange/advance exchange, the concerned notification has been revised to enable advance export of serviceable parts. Foreign aircraft brought to India for MRO work will be allowed to stay for the entire period of maintenance or up to 6 months, whichever is lesser, provided it undertakes no commercial flights during the stay period. For stay beyond 6 months, DGCA's permission will be required. For ease of doing business and to provide further incentive to this sector foreign MRO/OEM experts will be provided visas promptly and in cases of an Aircraft on Ground (AOG) situation, Temporary Landing Permits shall be issued.

N. Ground handling

The existing Ground Handling Policy/Instructions/Regulations will be replaced by a new framework. Under the proposed new scheme, the airport operator will ensure that there will be three Ground Handling Agencies (GHA) including Air India's subsidiary/JV at all major airports as defined in AERA Act 2008 to ensure fair competition. Non-major airports are exempted from minimum number of ground handlers. Airport operator will decide on the numbers, based on the traffic output, airside and terminal building capacity.

O. Air cargo

Revenue from air cargo helps airlines subsidize the cost of passenger tickets and take flying to the masses. Air cargo, particularly domestic has a high employment potential, especially for semi-skilled workers. So, cargo facilities co-located at an airport have now been covered under the 'Harmonised List of Infrastructure and will get the benefit of 'infrastructure' sector. The Air Cargo Logistics Promotion Board has been constituted to promote growth in air cargo by way of cost reduction, efficiency improvement and better inter-ministerial coordination. The government will streamline and simplify customs procedures and ensure a shift to paper-less air-cargo processing through use of digital signatures for transmission of messages.

The government will endeavour that all relevant central government authorities are available through a single window at the cargo terminals. These include customs, wild life clearance, Drug Controller, Plant and Animal Quarantine, FSSAI, Archaeological Survey of India, DGCI etc. Clearances will be given promptly and online after necessary checks through a Single Window System. The government has commenced 24x7 customs operations at several airports. However, it has not been utilised optimally by industry. ACLPB will promote global good practices like Free-Trade Warehousing Zones (FTWZ), Air Freight Stations, bonded trucking, dedicated cargo airports etc. MoCA will encourage development of cargo-villages near airports.

P. Aeronautical “Make in India”

MoCA would be nodal agency for developing commercial aero-related manufacturing and its ecosystem in India. MoCA and MoD will work together to ensure that commercial aero manufacturing is covered under defence offsets requirements. MoCA will encourage Indian carriers to consolidate their future demand for commercial aircraft. The government will encourage global OEMs for establishment of aircraft assembly plant in India along with its ancillary industries.

Area where aero-manufacturing takes place will be notified as SEZ after following the due process. The government will provide fiscal and monetary incentives and fast-track clearances to global OEMs and their ancillary suppliers. In case the cost of made-in-India aircraft and components work out to be higher than those supplied from their original sources, the government will consider an incentive package to nullify the cost differential.

Q. Sustainable aviation

MoCA will strive to develop a sustainable Indian aviation industry. It will work with DGCA, Ministry of Environment, Forest and Climate Change and industry stakeholders to develop an appropriate action plan. MoCA will pursue limitation of CO₂ emission in Indian aviation in coordination with ICAO under the principles and provisions of the United Nations Framework Convention on Climate Change (UNFCCC) and its Paris agreement. MoCA will strive to optimise Flexible Use of Airspace (FUA) in consultation with Ministry of Defence. MoCA will encourage roll out of Airport Collaborative Decision Making (CDM) to reduce on-ground and aerial congestion. All equipment operating within the airport environment will be in compliance with latest emission norms by 1 April 2017. Ground handling vehicle will use alternative fuels that can provide significant Local Air Quality (LAQ) emission benefits compared with petrol and diesel equipment. Options include LPG/CNG vehicles, low emissions vehicles (LEV), hydrogen vehicles, and electric vehicles. Airports will be encouraged to use Fixed Ground Electrical Power (FGEP) and Pre-Conditioned Air (PCA) units. Airlines will be encouraged to use single engine taxiing and dispatch-towing. All airports should undertake energy audit and adopt an energy conservation plan.

R. Aviation education and skill building

India has dearth of trained pilots, aircraft engineers and technicians, cabin crew, ground handling staff, cargo handling staff, administrative and sale staff, etc. According to certain estimates, the incremental human resource requirement of the Civil Aviation Sector by 2025 would be in the region of 3.3 lakhs. The manpower crunch has twin implications – it raises the cost of operations of airlines / airports / MROs etc. on the one hand and on the other, has safety implications as well. It is, therefore, pertinent to address these shortages on priority. Government will expedite the commencement of courses by the National Aviation University (NAU) in the financial 2016-17 after due consultations with Stakeholders. MoCA will provide full support to the Aviation Sector Skill Council (AASSC) and other similar organisations/agencies for imparting skills for the growing aviation industry in India after detailed skill gap analysis of the sector. MoCA will facilitate greater involvement of private sector in sponsoring aviation institutions, industrial training and R&D projects. MoCA, DGCA and BCAS will continue to undertake strict monitoring of aviation related educational institutions. Institutions not meeting the prescribed standards will invite appropriate

action. DGCA will also undertake appropriate modifications in the relevant CARs. MoCA will endeavour to have the Flight training schools, Aircraft Maintenance Engineering schools and other training schools providing training in the aviation sector registered/ recognised under law or as a part of an approved vocational education course or as training partners approved by the National Skill Development Corporation or the Sector Skill Council.

S. Miscellaneous

The government will promote –

- i. The use of seaplanes for growth of tourism and regional connectivity along India's 7500 km coastline.
- ii. Aero-sports activities with regulatory regime commensurate with the type of operations or aircraft in line with international best practices.
- iii. Satellite airports existing or new for non-commercial operations even within 150 kms from the PPP airports subject to the provisions of OMDA/ Concessionaire Agreements.
- iv. Operation of Remotely Piloted Aircraft Systems (RPAS) and their use for civil operations and issue guidelines in consultation with Ministry of Defence and Ministry of Home Affairs.

Finally, as per Essential Services Maintenance Act, 1968, essential services include *"...any service connected with the operation or maintenance of aerodromes, or with the operation, repair or maintenance of aircraft"*, so, the government will coordinate with state governments to include "ground handling", "catering" and "aircraft fuelling" under ESMA.

NCAP 2016 is a step forward to promote civil aviation towards creating an effective and efficient system, more simplified and made more transparent with greater use of technology without compromising on safety and security. It covers almost all crucial aspects of civil aviation to chart out a plan for improvement and increasing its user base. Despite the potential to be among the top nations in terms of domestic and international passenger traffic, Indian Aviation Sector, which is currently ranked 10th, has not witnessed any significant growth. Keeping this in perspective, NCAP 2016 envisages providing an ecosystem, creating a level playing field to various aviation sub-sectors and providing affordable flying to the masses. It spells out its mission to provide safe, secure, affordable and sustainable air travel with access to various parts of India and the world and has, therefore, outlined four objectives –

- i. Ensuring safe, secure and sustainable aviation industry through use of technology and effective monitoring.
- ii. Enhancing regional connectivity through fiscal support and infrastructure development.
- iii. Enhancing ease of doing business through deregulation, simplified procedures and e-governance.
- iv. Promoting the entire aviation sector chain: Cargo, MRO, General aviation, aerospace manufacturing and skill development.

II. LATEST NOTIFICATIONS/CIRCULARS

1. Press Note 5 (2016 Series) dated June 24, 2016 issued by Department of Industrial Policy and Promotion has amended the Consolidated FDI Policy Circular of 2016 issued on June 7, 2016

- a. **Civil Aviation Sector:** 100% FDI was allowed under automatic route in Greenfield Airport Projects and 74% in Brownfield Airport Projects under automatic route, and FDI beyond 74% for Brownfield Airport Projects was under government approval route. Now, 100 % FDI under automatic route is allowed in Brownfield Airport Projects as well

FDI up to 49% was allowed under automatic route in Scheduled Air Transport Service/ Domestic Scheduled Passenger Airline and regional Air Transport Service. Now, FDI up to 49% is permitted under automatic route and beyond 49% through government approval. However, for NRIs, 100% FDI will continue to be allowed under automatic route.

- b. **Defence:** In defence sector, FDI up to 49 % was allowed under automatic route and FDI above 49% was permitted through government approval on case to case basis, wherever it was likely to result in access to modern and 'state-of-the-art' technology in the country. Now, FDI beyond 49 % has been permitted through government approval route, in cases resulting in access to modern technology and the condition of access to 'state-of-the-art' technology has been done away with. Thus, a significant regulatory hurdle has been removed, as going forward, the foreign companies would not need to prove that their products are 'state-of-the-art'. Further, the FDI limit for the defence sector has also been made applicable on manufacturing of 'Small Arms and Ammunitions' covered under the Arms Act, 1959.
- c. **Private Security Agencies:** The amendment has clarified the meaning of the terms "Private Security Agency", "Private Security" and "Armoured Car Services" and these definitions have been incorporated under the PSAR Act. FDI up to 49% was permitted under government approval route in Private Security Agencies sector. Now, FDI is allowed up to 49% under automatic route and government route would be available for FDI beyond 49% and up to 74%. However, this increase in limit would necessitate an amendment in the PSAR Act.
- d. **Establishment of BO/LO/PO:** In case the principal business of an applicant, who is desirous of establishing a branch office, liaison office, project office or any other place of business in India, falls within Defence, Telecom, Private Security or Information and Broadcasting sector, the requirement of approval of the RBI or separate security clearance has been done away with in cases where FIPB approval or license/permission by the concerned Ministry/Regulator has already been granted.

Author

Neeraj Dubey
Joint Partner
Bangalore office



**Lakshmikumaran
& Sridharan**
attorneys

NEW DELHI

5 Link Road, Jangpura Extension,
New Delhi 110014

B-6/10, Safdarjung Enclave
New Delhi - 110 029
Phone : +91-11-4129 9811
E-mail : lsdel@lakshmisri.com

MUMBAI

2nd Floor, CNERGY IT Park,
Old Standard Mill,
Appa Saheb Marathe Marg,
Prabhadevi,
Mumbai - 400 025
Phone : +91-22-2439 2500
E-mail : lsbom@lakshmisri.com

CHENNAI

2, Wallace Garden, 2nd Street
Chennai - 600 006
Phone : +91-44-2833 4700
E-mail : lsmds@lakshmisri.com

BENGALURU

World Trade Center,
No. 404-406, 4th Floor, South Wing,
Brigade Gateway Campus,
No. 26/1 Dr. Rajkumar Road,
Malleswaram West,
Bengaluru - 560 055
Phone : +91-80-49331800
E-mail : lsblr@lakshmisri.com

HYDERABAD

'Hastigiri', 5-9-163, Chapel Road
Opp. Methodist Church, Nampally
Hyderabad - 500 001
Phone : +91-40-2323 4924
E-mail : lshyd@lakshmisri.com

GENEVA

Lakshmikumaran & Sridharan SARL
Avenue Giuseppe-Motta 35-37
1202 Geneva
Phone: +41 22 919 04 30
Fax : +41 22 919 04 31
E-mail : lsgeneva@lakshmisri.com

AHMEDABAD

B-334, SAKAR-VII,
Nehru Bridge Corner, Ashram Road,
Ahmedabad - 380 009
Phone : +91-79-4001 4500
E-mail : lsahd@lakshmisri.com

PUNE

607-609, Nucleus
1 Church Road, Camp
Pune - 411 001
Phone : +91-20-66801900
E-mail : lspune@lakshmisri.com

KOLKATA

2nd Floor, Kanak Building
41, Chowringhee Road
Kolkata - 700071
Phone : +91-33-40055570
E-mail : lskolkata@lakshmisri.com

CHANDIGARH

SCO No. 59, 1st Floor,
Sector 26, Madhya Marg,
Chandigarh - 160 026
Phone : +91-172-4921700
E-mail : lschd@lakshmisri.com

GURGAON

OS2 & OS3, 5th floor,
Corporate Office Tower,
AMBIENCE Island, Sector 25-A,
Gurgaon- 122001
Phone : +91-0124-477 1300
E-mail : lsgurgaon@lakshmisri.com

LONDON

Lakshmikumaran & Sridharan
Attorneys (U.K) LLP
Octagon Point, St. Paul's,
London EC2V 6AA
Tel : +44 20 38232166
E-mail : ls london@lakshmisri.com

ALLAHABAD

3/1A/3, (opposite Auto Sales)
Colvin Road, (Lohia Marg),
Allahabad -211001 (U.P.)
Tel : (0532) - 2421037, 2420359
E-mail : lsallahabad@lakshmisri.com



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