



Lakshmikumaran  
& Sridharan  
attorneys

30  
years



# Aviation/ Aerospace Roundup

OCTOBER  
2015

# REGULATIONS CHECK

## SAFETY CLEARANCE FOR GROUND HANDLING



### 1. Introduction

- 1.1 Ground handling constitutes an integral and inalienable part of any airlines' business and it is one of the main and unique, selling propositions of the airlines differentiating the services provided by one particular airline from their competitors. The ground handling services are aimed at providing a hassle free experience to the passengers and are akin to providing hospitality services. Essentially, ground handling is an essential service that is required by an aircraft operator before take-off and after landing.
- 1.2 The International Civil Aviation Organization (ICAO) refers ground handling as the "**services necessary for an aircraft's arrival at, and departure from, an airport**" whereas the International Air Transport Association describes it as "**an essential part of the overall product airlines offer to their passengers.**" In Indian context, ground handling means: ramp handling, traffic handling and any other activity specified by the Central Government. Here, ramp handling includes cabin services like cleaning the plane, replenishing the supplies and consumables, etc. and traffic handling services include guiding the aircraft into and out of the parking position, refilling of fresh water tanks, air conditioning, luggage handling by belt loaders and baggage carts, passenger stairs (used instead of aerobridges or air stairs), wheel chair lifts, providing check-in counter services, gate arrival and departure services and airline lounges, etc.
- 1.3 It is pertinent to trace back the history of evolution of the existing regulation on ground handling to understand the basis on which it was created and whether it serves the purposes for which it was formed.

### 2. The evolution of regulations

- 2.1 The convention of International Civil Aviation in 1944 (aka Chicago Convention) marked a significant event in the history of civil aviation where 52 States signed an agreement to co-operate in the civil aviation sector and decided to have uniformity in regulation and standards, procedures and organisation regarding civil aviation matters. As a consequence of this convention, ICAO was formed in 1947. One of the main activities of ICAO is standardisation of practices and procedures of matters related to aviation and establishment of International Standards and Recommended Practices published by ICAO. However, ICAO does not have the mandate to enforce the implementation.
- 2.2 In India, the Director General of Civil Aviation (DGCA) issued Aeronautical Information Circular (AIC) in 2007 granting the permission to the ground handling agencies to provide ground handling services, as a joint venture with the national carrier and/or AAI, apart from the existing GHS providers – the Air India/Indian Airlines. Due to security concerns at Indian airports, the Bureau of Civil Aviation Security (BCAS) issued a circular making it mandatory for all ground handling service providers to undergo security clearance and background checks of its employees before issuing the airport entry pass.
- 2.3 The circular dated 19.2.2007 issued by the BCAS provided for instructions on deployment of ground handling agencies at the airports. BCAS found a number of ground handling agencies which were working at the airports without prior security clearances and background checks and, in view of the current surcharged security environment in the country and threat to civil aviation from terrorist outfits, induction of private ground handling agencies into the airports without proper background

checks, security clearance from the appropriate authority and authorization by the AAI/Airport Operator could lead to serious security and legal problems. In the said circular, certain instructions were also given which are reproduced below:

- i. No ground handling agency shall be allowed to work at the airport in future by the Airport Operator, Aircraft Operator or any other agency which has legitimate functions at the airport, unless prior security clearance is obtained from the BCAS.
- ii. As per the Ground Handling Regulations 2000 dated 17.1.2000, the AAI/Airport Operator may issue a license only after security clearance from the BCAS to such ground handling agencies on prescribed terms and conditions and eligibility criteria for ground handling agencies and the number of such agencies to be appointed at each airport shall be determined keeping in view the safety, security, demand, available infrastructure, land and other relevant considerations to be laid down by the AAI in accordance with the Section 5 of the AAI Ground Handling Regulations (2000).
- iii. Aircraft operator shall enter into contract with the ground handling agencies only after prior security clearance to these entities from the BCAS and approval from the AAI/Airport Operator.
- iv. In case AAI/Airport Operator or Aircraft Operator intend to appoint a new ground handling agency, the details of such agency is required to be sent to BCAS along with the profile of such company at least 3 months in advance so that the background check of the ground handling agency can be done by the BCAS through IB and local police.
- v. Background check in respect of the ground handling agencies working in the airports is necessary. Therefore, AAI/Aircraft Operator shall send the details of the each existing ground handling company, already engaged by them for ground handling functions along with the company profile and address, telephone numbers etc. of Board of directors and management so that the necessary action could be taken by the BCAS to get the antecedents verified of such agencies. In case any company comes to adverse notice, the same shall not be allowed to work at the airport and shall be liable to be removed from the airport.
- vi. Security related functions as specified by the BCAS in the National Civil Aviation Security Programme and amended from time to time shall not be entrusted to the ground handling agencies by the AAI Airport and Aircraft Operators.
- vii. Airport Entry Permits to employees of the ground handling agencies shall not be issued by the BCAS unless they have completed the BCAS prescribed Aviation Security Awareness programme, their background check has been completed and there is no adverse report against them.

2.4 The AIC no. 03/2010 dated 2nd June 2010 revised the aforesaid circular and the Airports Authority of India (General Management, Entry for Ground Handling Services) Regulations, 2000 (**Regulations**), was enacted under Section 42 of the AAI Act, 1994 and, thus, are applicable to the airports managed by the AAI. This Regulation allowed any other ground handling agent handling service providers selected through competitive bidding on revenue sharing basis by the airport operator subject to security clearance by the Government and observance of performance standards as may be laid down by the airport operator. As several airports were undergoing restructuring and several other were being developed as Greenfield airports in the private sector, it became imperative for the Central Government to lay down the eligibility criteria for various agencies to undertake ground handling services at non-AAI airports. The number of such agencies to be permitted at each airport was also to be restricted having regard to all the relevant factors such as demand for such services, available infrastructure and competitive environment, without compromising the safety and security aspects.

2.5 Rule 92 of the Aircraft Rules, 1937 (**Rules**) provides that the licensed public aerodromes shall, while providing ground handling services themselves ensure a competitive environment and allow the ground handling service providers permitted by the Central Government to provide ground handling services at such aerodromes without any restriction. These ground handling service providers

shall, however, be subject to security clearance of the Central Government. As such, it is for the Central Government to decide the agencies that can provide ground handling services at various aerodromes and also the eligibility criteria for such service providers.

## 2.6 The **Eligibility Criteria for Ground Handling Service Providers** as per the Regulations are as under –

- A. The following entities shall be eligible to undertake ground handling services at airports other than those belonging to the AAI:
- a. All Metropolitan Airports, i.e. the airports located at Delhi, Mumbai, Chennai, Kolkata, Bangalore and Hyderabad
    - i. The airport operator itself or its Joint Venture (JV) partner;
    - ii. Subsidiary companies of the national carrier i.e. National Aviation Company of India Ltd. or their joint ventures specialized in ground handling services. - 3 - Third party handling may also be permitted to these subsidiaries or their JVs in the basis of revenue sharing with airport operator subject to satisfactory observance of performance standards as may be mutually acceptable to the airport operator and these companies; and
    - iii. Any other ground handling service providers selected through competitive bidding on revenue sharing basis by the airport operator subject to security clearance by the Government and observance of performance standards as may be laid down by the airport operator. Note.– A minimum of two ground handling service providers shall be authorized at these airports in addition to the subsidiaries of National Aviation Company of India Ltd.
  - B. At all other airports: In addition to the entities mentioned above, the airline operators shall also be permitted to undertake self-handling. However, foreign airlines shall not be allowed to engage themselves in self-handling.
  - C. Additional Provisions: The provisions contained in (A) and (B) above shall be subject to the following:
    - i. All private airlines, including foreign airlines, may undertake self handling in respect of "passenger and baggage handling activities at the airport terminals" and "traffic service including the passenger check-in", which require passenger interface, at all airports.
    - ii. All cargo airlines, which have their own cargo aircrafts, may undertake self handling in their hub airports.
    - iii. Foreign airlines / private independent ground handling service providers not be permitted self ground handling / ground handling at joint user Defence airfields.
- B. Entry into Terminal Building / Movement Area:** Except as provided in rule 90 of the Aircraft Rules, 1937, the bona fide employees of the entities permitted to undertake ground handling services at airports in accordance with paragraph 2 shall also be allowed to enter and remain in the terminal building or movement area.
- C. Security Protocol**
- i. Bureau of Civil Aviation Security may impose such restrictions as may be necessary in this behalf on grounds of security.
  - ii. All concerned agencies as specified in paragraph 2 hereinabove shall be required to follow the instructions issued by BCAS as contained in Annexure 'C' or as may be altered/substituted/modified or amended from time to time.
  - iii. Further, all concerned agencies, besides complying with the above, shall also be required to follow the provisions contained in the Aircraft Act, 1934 and the rules made thereunder and directions, orders and circulars issued from time to time.
- D. Equipment:** All concerned agencies shall ensure that the state-of-art equipment is used and best practices are to be followed.

2.7 The airline operators protested the aforesaid policy changes and the Federation of Indian Airlines along with other airlines filed a writ petition in the Delhi High Court and challenged AIC 3/2010 dated 2.6.2010, to the extent that it precluded the private airlines from conducting ground handling operations which does not involve passenger interface. They alleged that the circular was anti competitive as it created monopoly in favour of a selected few ground handlers and would lead to cartelization by independent ground handlers. The petition was finally dismissed and the Delhi High Court held –

*“Rule 134 does not vest any right on the airline operator for any ground handling service. The Civil Aviation requirements have been formulated by the Director General of Civil Aviation. Clause 3.2.6 shows that an airline operator must have ground handling facilities and staff for preparation of load and trim sheet, flight despatch and passenger / cargo handling and further postulates that the staff should have undergone the training and checks as specified by DGCA. The same is the minimum requirement for grant of permit. The DGCA who has been conferred the power under Section 42 has framed the Regulations. The Civil Aviation Requirements only laid down the condition for fixing the eligibility criteria. That did not vest any kind of inalienable right with the petitioners. The Regulations have given more emphasis on security impact. In any case, merely because an eligibility criteria has been fixed, that does not mean the same cannot be changed. The eligibility criteria for grant of permit of ground handling facilities were laid down. It is obligatory on the part of the airline operator to provide the ground handling facility, if the authority so directs. When the condition has been altered, that by no stretch of imagination, would vitiate the Regulations issued under Section 42 on the foundation that it violates Rule 134 of the Rules. We perceive no justification in such a stand. Therefore, we repel the aforesaid submission advanced by the learned counsel for the petitioners.*

*In view of our aforesaid premised reasons, we do not find any substance in any of the proponents that have been canvassed on behalf of the petitioners and consequently we perceive no merit in the writ petition and accordingly the writ petition and all the interim applications stand dismissed.”*

2.8 Though there is 100% FDI in Ground Handling Services markets, but it remains economically regulated as the prices are allowed to range within the maximum cap set by the Airports Economic Regulatory Authority (AERA). AERA determines the tariff for the aeronautical services, the amount of the Development Fees in respect of major airports and the amount of the Passengers Service Fee levied under Rule 88 of the Rules. Vide Direction no. 4/2010-11 dated 10-01-2011, AERA defined the terms and conditions for determination of tariff for services provided for Cargo Facility, Ground Handling and Supply of Fuel to the Aircraft. Such economic regulations prevent the market forces to operate freely and release the cost and efficiency benefits to the customer airlines.

## 3. CIVIL AVIATION REQUIREMENTS: Section 4

**3.1 Applicability:** This CAR was issued under provisions of Rule 29C and Rule 133A of the Rules. It lays down the requirements to be fulfilled by the ground handling and ramp safety service providers at airports. This CAR is applicable to the ground handling service providers permitted by the Central Government under Rule 92 of the Rules.



**3.2 Approval:** Ground handling service provider intending to operate at Indian airport(s) shall have a valid permission from the Central Government under Rule 92 of the Aircraft Rules, 1937.

**3.3 Approval process:** The following steps are involved in the approval process:

**Step 1:** The applicant shall submit to DGCA for grant of permission to undertake ground handling services the following documents –

- i. An application;
- ii. A copy of the Ground Handling Manual and preparedness status report;
- iii. Security clearance from the BCAS; and
- iv. Insurance policy covering the liability of the organization towards its personnel, equipment and third party.

**Step 2:** Upon receipt of the application, DGCA shall verify the following:

- i. Ground Handling Manual;
- ii. Examine the preparedness status report to ensure that a satisfactory system exists within the organization for conduct of internal audit;
- iii. An acceptable safety management system is established within the organization;
- iv. An acceptable training programme is established within the organization;
- v. The ground handling facilities, equipment, services and procedures are appropriate for the scope and type of services as proposed; and
- vi. The ground handling of dangerous goods is conducted in accordance with ICAO Technical Manual.

**Step 3:** The applicant shall demonstrate

- i. Compliance to recommended practices contained in the ICAO Technical Manual;
- ii. That all personnel engaged in handling dangerous goods have undergone training in accordance with CAR Section 11, Series C, Part I.

**Step 4:** In order to ascertain that the application and the accompanying documents furnished by the applicant are accurate and complete in all respects, an assessment shall be made by a committee consisting of representatives from the Directorate of Aerodromes, Directorate of Airworthiness, Directorate of Flight Standards and Directorate of Air Transport. This process shall be coordinated by the Director of Aerodrome Standards who shall act as the nodal officer. Upon being satisfied, DGCA may issue ground handling safety clearance to the applicant and endorse conditions or limitations to the operations, as required. If application is complete and there are no substantive issues with DGCA, the applicant can expect issue of safety clearance for undertaking the ground handling operations within 60 days of fulfilling all the requirements.

**3.4 Ground Handling Manual:** The Ground Handling Manual is a fundamental requirement of the safety clearance process. It should typically contain all pertinent information concerning the ground handling facilities, services, equipment, operating procedures, training programme, organizational structure and safety management system. The ground handling manual shall be amended from time to time to ensure current and accurate information at all times. The ground handling clearance holder shall be responsible for submitting the amendments to the DGCA for approval.

**3.5 Training Requirements:** To ensure safety of all personnel engaged in airside activity, the organization shall establish minimum training requirements. The objective of training is to ensure that required personnel are provided with requisite skills and knowledge to handle ground handling operations efficiently. The training shall cover both theoretical and practical skill to verify the personnel understanding of the task being trained. All training records shall be documented and made available for review by the authorized person of the organization and/or by DGCA. To maintain ongoing competence, all personnel engaged in airside activity shall undergo recurrent training periodically.

**3.6 Safety Management System:** The ground handling organization shall establish a safety management system applicable to the size, scope and complexity of its handling activities, with a view to ensure that operations are carried out in a controlled and safe manner. The ground handling organization shall ensure that all its personnel comply with the safety requirements at various airports in accordance with applicable DGCA regulations and/or conditions laid down by the airport licensee.

**3.7 Incident/Accident Reporting:** All ground incidents/accidents shall be recorded which would enable the organization to develop the preventive actions. The report for all types of damage events (aircraft, equipment, facility, etc.) during ground operations should be submitted to the Directorate of Air Safety and Aerodrome Standards of DGCA and all relevant parties as soon as possible and in any case within 48 hours after such occurrence. Record of all the safety findings shall be maintained and forwarded to DGCA periodically along with action taken report.

**3.8 Emergency Response System:** Each organization engaged in ground handling operations shall establish an emergency response procedure and train its personnel for implementation of such procedures. Emergency response contact information shall be made available to all ground handling organization personnel in order to enable timely response in case of an emergency or incident requiring immediate response action.

**3.9 Ground Handling Operations:** The ground handling organization shall conduct operations in accordance the procedures set forth in its Ground Handling Manual approved by DGCA. To ensure safety of passengers and aircraft, the DGCA may give directions to the ground handling organizations from time to time for amendment of procedures contained in its Ground Handling Manual. The ground handling organization shall ensure proper upkeep of its facilities and equipment. The ground handling organization may refer to the Guidance Material on airside safety procedures contained in Aerodrome Advisory Circular on Ground Handling issued by DGCA.



**3.10 Annual Status Reporting:** The operator shall submit following information to DGCA on annual basis or as directed by Director General from time to time:

- i. Changes in Management structure/qualified personnel.
- ii. Alteration in the ground support equipment vis-à-vis scope of services.
- iii. Compliance of training programme.
- iv. Compliance of safety findings of ground accidents/incidents.
- v. Copy of latest insurance policy.



DGCA may carry out an audit of the operator's facilities if considered necessary. The organization shall demonstrate continued capability to conduct the ground handling operations authorized under the safety clearance. The fees payable by the applicant shall be as laid down in the Aircraft Rules from time to time. The validity of the safety clearance for Ground Handling shall be for a period not exceeding two years. Degradation of the ground handling service provider's capability below the required level or breach of any provision of this CAR or of any provisions of the Aircraft Act, 1934 and the Rules shall render the safety clearance for Ground Handling liable to alteration, suspension or cancellation.

## LATEST NOTIFICATIONS/CIRCULARS

1. **PUBLIC NOTICE (File No. : 11-690/Sec2/E-VIII/2012) dated 1<sup>st</sup> July 2015 on the extension of applicability of CAR Section 2 Series E Part VIII:** The CAR Section 2 Series E Part VIII, issue IV, Rev 3 dated 30<sup>th</sup> April 2012 was applicable only till 31<sup>st</sup> July 2015; however, keeping in view that institutes have inducted batches during 2013, 2014 sessions and the introduction of new CAR to replace the aforesaid CAR has not been completed, this Public Notice extends the applicability of the existing CAR up to 31<sup>st</sup> July 2018. Institutes shall not induct any fresh batch under the existing CAR and applications for issue / extension of scope of approval under the existing CAR will not be considered. The proposed new CAR on approval of training institutes for imparting ab-initio training based on requirements prescribed in CAR 66 is under preparation.
2. **PUBLIC NOTICE (Reference No. AV/22025/26/DMS/Med) dated 17<sup>th</sup> Sep 2015:** Rules 39-C, Para 3 of the Aircraft shall come into effect from October 1, 2015. The said paragraph reads as – *"In case of renewal, the period of validity of medical fitness assessment shall commence from the date following the date of expiry of the previous medical fitness assessment, subject to the condition that the medical examination for renewal has been conducted within a period of not more than one month preceding the date of expiry of the previous validity"*.



- 3. CAR SECTION 2 - AIRWORTHINESS SERIES "R" PART II ISSUE III, 26<sup>th</sup> DECEMBER 2013 EFFECTIVE: FORTHWITH (F. No. 11-690/R Part II/ 08-AI(2)) on the installation of communication, navigation and radar equipment as revised from 6<sup>th</sup> October 2015:** Pursuant to the Aircraft Rules 9(3) and 57, every aircraft should be fitted and equipped with radio apparatus as may be specified according to the use and circumstances under which the flight is to be conducted and the CAR Section 2 describes the procedures and requirements to be complied with for installation of airborne communication, navigation and radar equipment as follows –
- i. Any new avionic installation or replacement of existing installation shall be carried out after development of Supplemental Type Certificate (STC) and the developed STC shall be accepted or approved by DGCA as appropriate; If not covered by STC, then it should have prior approval of DGCA;
  - ii. For grant of approval from DGCA, proposal shall be made through local Airworthiness Office after ensuring the following –
    - a. The proposed equipment is of the approved type and is compatible with the existing system.
    - b. Necessary electrical power is available in the aircraft for the proposed equipment.
    - c. Required space is available at suitable location in the aircraft and proposed installation shall not affect the structural integrity of the aircraft.
    - d. C.G. should remain within the limits if proposed installation is carried out.
    - e. There is no radio interference due to installation of the new equipment which affects the performance of any other radio equipment installed in the aircraft.
  - iii. After completion of proposed installation or replacement work testing of the system shall be accomplished only after obtaining short term aero mobile license for operating radio apparatus from WPC Wing of Ministry of Communications. This is applied to the DGCA through the local airworthiness office.
  - iv. On receipt of the short term permit, the operator shall complete all the installation checks including ground and flight tests as per the approved installation check schedule and prepare a schedule of the tests based on the guidelines contained in the BCAR Section R and FAA Advisory Circular AC 43-13 and forward it to the local Airworthiness office for approval.
  - v. On receipt of the installation check report, the aircraft shall be offered for inspection and communication check to the local airworthiness office and after the satisfactory checks the operator should obtain the regular aero mobile license from the WPC in a separate form through the local airworthiness office.

**4. CAR SECTION 8 – AIRCRAFT OPERATIONS SERIES 'A', PART I ISSUE I, DATED 29.3.1994 EFFECTIVE: 24<sup>th</sup> September 2015 (F. No. AV 22024/9/2014-FSD) on the Minimum flight crew requirements:**

In order to ensure safe operation of an aircraft, it is necessary to have adequate flight crew members, who are appropriately trained, qualified and licensed, to operate the particular type of operations on the aircraft. Rule 38A(7) of the Aircraft Rules, 1937, stipulates broadly the minimum crew required to operate a flight and CAR gives in detail the requirements relating to minimum flight crew as applicable to aeroplanes and helicopters engaged in scheduled, non-scheduled and other public transport operations including State Government operations and aerial work operations. Essentially,

- i. The number of the flight crew members operating any flight, shall not be less than that specified in the approved aircraft Flight Manual or Operations Manual or Certificate of Airworthiness.
- ii. The following aeroplanes shall be flown by at least two pilots –
  - AUW exceeding 1500 kgs engaged in Scheduled / Non Scheduled Air Transport operations;
  - Operated by State Governments and engaged in carriage of VVIP/VIP;
  - Having all-up-weight more than 5700 kg;
  - Aerial work aircraft, when engaged in flight calibration, aerial survey and remote sensing work irrespective of its weight;
  - Aircraft having a seating capacity of 10 or more seats, excluding pilot seat(s);
  - Irrespective of seating capacity and all-up-weight, and unless approved otherwise by DGCA in accordance with para 4.9.1 of CAR Section 8 Series 'O' Part II (Reproduced at Appendix 'A') aircraft powered by one or more Turbo Jet or Turbo fan engines OR aircraft powered by one or more Turbine Propeller engines and provided with a means of pressurising the passengers cabin OR aircraft powered by two or more Turbine Propeller engines and not provided with a means of pressurising the passengers cabin unless it is equipped with a certified auto-pilot OR aircraft powered by two or more piston engines unless it is equipped with a certified auto-pilot.
- iii. The requirements relating to carriage of Flight Navigator, Flight Engineer, Flight Radio Operator, Flight Radio Telephone Operator and Cabin Attendants, as specified in Rule 38A and 38B of Aircraft Rules 1937 shall be complied with in all cases
- iv. No operator may use any person nor may any person serve as a Pilot-in Command for single pilot operation unless that person had at least 100 hours Pilot in-Command experience on the type and model of the aircraft to be flown and has met all other applicable requirements.
- v. Notwithstanding the aforesaid, DGCA may require an operator to carry additional flight crew members or relax the requirements (if safety can be achieved by any alternate manner), if considered necessary, for safety of aircraft operations.

## Author

**Neeraj Dubey**

Joint Partner, L&S, Bengaluru



**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 : lsomb@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

#### EUROPE

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



---

**Disclaimer:** L&S Aviation/Aerospace Roundup is meant for informational purpose only and does not purport to be advice or opinion, legal or otherwise, whatsoever. The information provided is not intended to create an attorney-client relationship and not for advertising or soliciting. Lakshmikumaran & Sridharan does not intend to advertise its services or solicit work through this update. Lakshmikumaran & Sridharan or its associates are not responsible for any error or omission in this newsletter or for any action taken based on its contents. Unsolicited mails or information sent to Lakshmikumaran & Sridharan will not be treated as confidential and do not create attorney-client relationship with Lakshmikumaran & Sridharan.

If you wish to unsubscribe, please send an e-mail to [lsblr@lakshmisri.com](mailto:lsblr@lakshmisri.com)  
Visit us at [www.lakshmisri.com](http://www.lakshmisri.com)

© 2015 Lakshmikumaran & Sridharan. All rights reserved.