



Will Löfberg
VP International, Government & Environment Affairs
Tel : +(9714) 7083595
Fax : +(9714) 2864046
Email : will.lofberg@emirates.com

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Mr Shri Syed Tausif Abbas
Advisor - Networks, Spectrum and Licensing
Telecom Regulatory Authority of India
Mahanagar Doorsanchar Bhawan
Jawahar Lal Nehru Marg
New Delhi- 110002
India

Dear Mr Abbas,

Consultation on Inflight Connectivity

Emirates welcomes the opportunity to share its views with the consultation on Inflight Connectivity (IFC) in India. We fully support the Department of Telecommunications' proposal to introduce IFC for voice, data and video services over Indian airspace for domestic and international flights.

Emirates, based in Dubai, was established in 1985 and since then has grown to become one of the world's largest carriers. Emirates operates the world's largest fleets of Boeing 777 and Airbus A380 aircraft, with a combined total of 263 in service and another 210 on order, operating to 156 destinations in 84 countries across six continents. Our fleet is one of the most modern and efficient aircraft fleets in worldwide commercial aviation, with an average aircraft age of just 63 months.

In 2016/17 Emirates was the largest airline in the world in terms of international revenue passenger miles, and carried 56.1 million passengers and 2.6 million tonnes of cargo.

India has been an integral part of Emirates' route network since the airline was first launched in 1985. Starting with Mumbai and Delhi, Emirates has progressively grown its Indian network to 172 weekly flights across nine destinations, including the non-hub airports of Ahmedabad, Bengaluru, Chennai, Hyderabad, Kochi, Kolkata and Thiruvananthapuram.

Emirates carried 5.4 million passengers on its India flights in 2016/17, with a total of 43.9 million passengers carried over the past 10 years. During the same period, Emirates carried over 258,000 tonnes of cargo on its India flights. The Emirates Group currently employs over 13,760 Indian nationals globally – making up 20% of its total workforce, most of them in high-skilled employment.

The economic benefits of Emirates' India flights are significant. These flights stimulate economic activity across the employment and supply chain, generating demand for Indian goods and services and creating new jobs. A 2015 study by India's National Council of Applied Economic Research (NCAER) found that Emirates' operations contribute US\$848.6 million to the Indian economy each year and support 86,255 jobs. The study concluded that Emirates' operations bring in 673,544 tourists to India annually and the resulting economic activity generates US\$1.7 billion in annual Foreign Exchange Earnings for India.





Emirates also prides itself on being an industry leader in terms of IFC, being the first airline to install in-seat telephones and onboard faxes back in 1995. In 2011, Emirates launched its first inflight Wi-Fi service, and today, Emirates customers can connect to Wi-Fi, send emails and text messages via their personal in-flight entertainment system screens, as well as use their personal mobile devices to make calls and send messages.

Emirates is still leading the way on IFC and continues to invest over US\$20 million annually on installing and operating IFC systems which enable onboard Wi-Fi services. Inflight Wi-Fi usage has grown tremendously over the last few years. This year alone, over nine million Emirates passengers connected to our Wi-Fi on board, reflecting the strong consumer demand for connectivity services while travelling.

As a global connector of people and places, Emirates is committed to making our entire fleet Wi-Fi enabled. Customers seek Wi-Fi on-the-go, especially while travelling, and it is becoming the norm for most people who want to stay connected through online social networks and instant messaging. Currently, Wi-Fi service is available on all of Emirates' Airbus A380 aircraft and around 88% of its Boeing 777 aircraft, with more being upgraded each month.

There are now only a few countries in the world where IFC is restricted, as highlighted in the attached Emirates' Wi-Fi coverage map from our service provider SITAONAIR (see Annex A). It is also worth noting that, in addition to our 172 weekly flights to India being affected by the IFC restrictions, Emirates operates around 165 flights a day destined for other countries that overfly Indian airspace (around 47 Airbus A380s and 118 Boeing 777s as at October 2017). Each day, the tens of thousands of passengers that travel on these flights are also impacted by the current IFC restrictions.

Emirates would like to address some of the specific questions raised in the consultation paper. Please see our responses below:

	Consultation Questions	Emirates Comments
Q. 1.	Which of the following IFC services be permitted in India? a. Internet services b. Mobile Communication services (MCA service) c. Both, Internet and MCA	Emirates believes that both internet services and mobile communication services should be permitted in Indian airspace. It is important for airlines to have choice when it comes to IFC. This means that the introduction of IFC in India should encompass all relevant satellite bands - L-band, Ku-band and Ka-band - and cover both internet access and mobile (voice, SMS, mobile data).
Q. 4.	Do you foresee any challenges, if the internet services be made available 'gate to gate' i.e. from the boarding gate of the departure airport until the disembarking gate at the arrival airport?	We do not foresee any technical challenges in gate-to-gate service provision. In fact, we would urge the Government to adopt this approach. Although, due to the high cost of satellite connectivity we may choose to defer the service until after take-off.
Q. 11	What restrictions/regulations should be in place for the provision of IFC in the foreign airlines? Should the regulatory requirements be any different for an IFC service provider to offer IFC services in Indian airspace in airlines registered outside India vis-à-vis those if IFC services are provided in Indian registered airlines?	Emirates believes the use of foreign satellite systems should be permitted in Indian airspace.
Q. 15.	Should the IFC operations in international flights (both Indian registered as well as foreign airlines) flying over multiple jurisdictions be permitted to use either INSAT System or foreign satellite system in Indian airspace?	Emirates believes the use of foreign satellite systems should be permitted in Indian airspace.

<p>Q. 16.</p>	<p>Please suggest how the IFC service providers be charged in the following cases? (a) Foreign registered airlines. (b) Indian registered airlines.</p>	<p>In our view, the IFC service providers should not be charged for foreign airlines, in line with the principle of reciprocity. Also, service provision for foreign airlines is already charged and duly regulated in the country of registration.</p>
<p>Q. 17.</p>	<p>Should satellite frequency spectrum bands be specified for the provisioning of the IFC services or spectrum neutral approach be adopted?</p>	<p>Emirates would suggest that the Government adopt the spectrum neutral approach.</p>

More generally, it is worth noting that different airlines will have different IFC strategies, however the absence of IFC in India (one of very few countries yet to introduce it) needs to be addressed as soon as possible for both Indian and foreign airlines so that a greater number of passengers can enjoy the benefits of being able to access Wi-Fi while travelling.

Finally, Emirates believes the licensing regime needs to be kept as simple as possible, ensuring that it does not add unnecessary cost or delays to airlines, and maintains the service on board foreign airlines in Indian airspace, without the need for separate authorisation.

As a long-standing strategic partner for India, Emirates is committed to the Indian aviation market and supporting its future growth. This is why we were keen to contribute to this consultation - a process that will, hopefully, result in the introduction of IFC for voice, data and video services over Indian airspace for domestic and international flights. We would like to thank the Telecom Regulatory Authority of India for the opportunity to be part of this process, and we remain available to elaborate further if necessary.

Yours sincerely



Will Löffberg
Vice President
International, Government & Environment Affairs

Annex A: Emirates' Wi-Fi coverage map

