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To  
Dy. Secretary  
Ministry of Civil Aviation  
Government of India  
"B" Block, Rajiv Gandhi Bhawan,  
New Delhi - 110003

**Sub: Suggestion / Objections and Request for Hearing in respect to Draft Notification published on 02<sup>nd</sup> May 2022 pertaining to Ministry of Civil Aviation (Height Restrictions for Safeguarding of Aircraft Operations) Amendment Rules, 2022**

Respected Sir

We have reviewed the proposed Draft GSR 333 (E), pertaining to Ministry of Civil Aviation (Height Restrictions for Safeguarding of Aircraft Operations) Amendment Rules, 2022 and we wish to list our Suggestions / Objections as stated below.

In order to avoid an individual personnel or aerodrome operator perception on displaced threshold declaration, strongly recommended for definition of displaced threshold. Otherwise same problem of individual interpretation will continue.

**"In case the threshold has been displaced due to Obstacles of Permanent Nature, which are in existence for considerable time, not likely to be removed or no scope for runway extension and Instrument Approach Landing Procedure are permanently established at the aerodrome with the threshold reference, the Threshold (Displaced) shall be considered as reference point" for NOC approach calculation.**

**Definition of Permanent Displaced Threshold:(Proposed)**

A displacement of threshold from the physical beginning or extremity of the runway due to obstacle/s affects the approach surface (or) Instrument Flight Procedure Establishment (or) Visual Approach Slope Indicator Protection Surface and lasting for a long, indefinite period without regard to unforeseeable conditions (or) forever (or) cannot be removed (or) shifted (or) reduced practically.

We request you to consider our Suggestions/Objections and grant us a hearing at the earliest.

Thanking you,

Yours faithfully,  
For CREDAI-MCHI

Boman Irani  
President

Dhaval Ajmera  
Hon. Secretary

**Maharashtra Chamber of Housing Industry**

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