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To,  
**The Chairman**  
**Airports Authority of India**  
**Rajiv Gandhi Bhawan**  
**Safdarjung Airport**  
**New Delhi – 110003**

Regd AD  
03/06/2025

**Subject: Request for Amendment to GSR 751(E) to Permit CNS Simulation Studies Outside Airport Boundaries**

Respected Sir,

CREDAI-MCHI wishes to respectfully bring to your attention a matter of significant importance to national urban development and airspace safety governance.

Under the current framework of GSR 751(E), the Airports Authority of India (AAI) is restricted from carrying out CNS (Communication, Navigation, and Surveillance) simulation studies for sites situated beyond the formal periphery of airport boundaries. This technical limitation has resulted in a regulatory vacuum where several urban infrastructure and development projects across the country are unable to undergo empirical assessment of their potential impact on aviation systems, despite the possibility that they may pose no real hazard to CNS infrastructure.

In many metropolitan areas — including Mumbai, Delhi, Hyderabad, and others — numerous government-led and private sector projects aimed at public welfare, infrastructure enhancement, or urban housing are often constrained by blanket height restrictions. These limits are imposed without the benefit of case-specific simulation studies that could scientifically determine their compatibility with existing CNS systems.

CREDAI-MCHI respectfully submits that the current regulatory constraint under GSR 751(E) merits an urgent amendment to empower AAI to initiate CNS simulation studies beyond airport boundaries where:

1. Developments lie outside Obstacle Limitation Surfaces (OLS) but may still intersect navigational signal paths;
2. The project can demonstrate social utility, urban infrastructure relevance, or architectural necessity.
3. A simulation would provide clarity on electromagnetic compatibility, signal attenuation, and radar line-of-sight interference.

This request is fully aligned with international norms and best practices:

- The Dubai Civil Aviation Authority (DCAA) mandates case-specific CNS assessments across a wide airport buffer zone.
- The Hong Kong Civil Aviation Department conducts radar and wind field simulations well beyond the airport radius due to surrounding terrain.
- Toronto Pearson Airport includes extended CNS buffer zones in its master planning, where developments undergo rigorous simulation regardless of location.

**Maharashtra Chamber of Housing Industry**

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We welcome and appreciate the recent decision by the Hon'ble Minister of Civil Aviation to constitute a committee to review and modernize India's civil aviation regulatory framework. This initiative underscores the Ministry's commitment to global benchmarking, scientific rigor, and modernization. Allowing CNS simulations beyond airport boundaries would be a concrete and immediate step in that direction — harmonizing India's approach with ICAO's principles of risk-based oversight and best practices adopted by leading global aviation regulators.

By permitting such simulations, AAI would enable a shift toward evidence-based aviation safety regulation. At the same time, such an amendment would unlock significant urban land potential for planned and sustainable growth — particularly in high-density and infrastructure-deficient regions.

This reform would strike a thoughtful balance between ensuring aviation safety and facilitating optimal land use, contributing meaningfully to the Government's vision of infrastructure-led nation-building.

**We respectfully urge the Ministry and AAI to consider initiating the necessary legal and policy process to amend GSR 751(E) accordingly. MCHI remains fully available to provide stakeholder input, technical consultation, or any facilitation required to support this initiative.**

With the highest regard and best wishes,

Yours sincerely,  
For CREDAI-MCHI

Dominic Romell  
President

Dhaval Ajmera  
Hon. Secretary

Keval Valambhia  
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**Cc:**

1. **Shri Kinjarapu Rammohan Naidu**  
**Hon'ble Minister of Civil Aviation**  
**Ministry of Civil Aviation**  
**Rajiv Gandhi Bhawan**  
**New Delhi – 110003**

