

Case File #23/2025





This proposition has been drafted by Kartik K, Nehal P, Shivam G.

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Email from International Aviation Mediation and Arbitration Centre (IAMAC)

To	ceo.office@skyswiftair.tt; caat.secretariat@gov.tt
Cc	legal@skyswiftair.tt; regulatory.affairs@skyswiftair.tt; aviation.legal@gov.tt
Subject	Confirmation of Mediation Proceedings

Dear Team,

I hope this email finds you well. I am writing to formally confirm that the International Aviation Mediation and Arbitration Centre (IAMAC) has agreed to facilitate and conduct the mediation proceedings proposed in relation to the regulatory and operational concerns involving SkySwift Airlines Limited and the Civil Aviation Authority of Terria, scheduled to be held in February 2025.

IAMAC acknowledges the background of the matter, including the revision of the Flight Duty Time Limitation (FDTL) norms pursuant to safety assessments initiated following a fatigue-related international flight incident in 2023, the subsequent transition framework notified in 2024, and the operational challenges observed upon the norms becoming fully enforceable. We also note the issues arising from crew availability constraints, flight disruptions, and their broader regulatory and commercial implications.

The Centre recognises the importance of addressing these concerns in a structured, collaborative, and non-adversarial setting. Accordingly, IAMAC will appoint mediators with domain experience in aviation safety regulation, airline operations, and regulatory compliance to assist the parties in exploring viable pathways toward resolution.

The objective of the mediation will be to facilitate constructive dialogue, assess compliance-related challenges, and identify mutually acceptable solutions that uphold aviation safety imperatives while ensuring operational continuity. Please feel free to share any specific issues, expectations, or procedural preferences that you would like the Centre to take into account while structuring the mediation process.

We look forward to assisting the parties in this process and to a productive engagement in March. Attached is a list of documents and exhibits accepted by the IAMAC, for your perusal.

Yours sincerely,

Dr. Helena Krauss

Registrar & Secretary-General

International Aviation Mediation and Arbitration Centre (IAMAC)

LIST OF DOCUMENTS

Exhibit	Document
Exhibit A	News Article dated 22 June 2023
Exhibit B	Interim Investigation Report
Exhibit C	Circular issued by Civil Aviation Authority of Terria
Exhibit D	Internal File Report of the Civil Aviation Authority of Terria
Exhibit E	Clippings from social media websites
Exhibit F	News Article dated 12 April 2025
Exhibit G	Advisory issued by Civil Aviation Authority of Terria
Exhibit H-I	Correspondences between Civil Aviation Authority of Terria, Terria and SkySwift Airlines

EXHIBIT A

22 JUNE 2023

TERRIA NATIONAL HERALD

Issue No. IX

SKYSWIFT AIRLINES FLIGHT SK-224 CRASHES AT LYDON AIRPORT IN TORRENTIAL RAIN; PILOT FATIGUE UNDER INVESTIGATION

Arav Iyer

Aurelion: An international passenger aircraft operating a scheduled service from Aurelion to Lydon crashed during its approach to Lydon International Airport early Thursday morning, killing 5 passengers including both pilots and severely injuring more than 70 other passengers.

The aircraft, a Boeing 737 registered TM-NGK, crashed beyond the threshold of the runway while attempting to land at Lydon in unfavorable weather conditions according to preliminary information released by local authorities. Emergency services were deployed immediately.

The Civil Aviation Authority of Terria (CAAT) has initiated a formal investigation into the crash. Officials confirmed that the probe will examine multiple factors, including aircraft performance, weather conditions, air traffic control communication, and crew duty and rest schedules. A senior official associated with the investigation said that weather conditions and pilot fatigue are among the aspects being examined, though no conclusions have been drawn at this stage. "We are not attributing cause or responsibility at this point. The investigation will focus on the factual reconstruction of events and operational conditions leading up to the crash," the official said.

Civil aviation records indicate that the flight was operating an international short-haul sector during early morning hours. Investigators are reviewing the crew's duty periods and rest compliance in the days preceding the flight.

The aviation regulator has stated that it will await the findings of the investigation before commenting on broader safety or regulatory implications. The aircraft manufacturer and airline operator have confirmed their cooperation with the inquiry. A detailed investigation report is expected to be released following completion of the technical and operational analysis.

City to Extend Night Metro Services on Weekends

In a bid to boost late-night mobility, the city transport authority announced extended metro services on Fridays and Saturdays starting next month. The move is expected to benefit night-shift workers and bolster the local nightlife economy, with trial operations set to run for three months before a full rollout.



MARKETS TODAY

Global equity markets opened lower on Monday as investors turned cautious following news of a major plane crash over the weekend. Aviation and travel stocks led the decline amid safety concerns and anticipated regulatory scrutiny, while broader indices slipped as risk appetite weakened. Analysts said the sell-off reflects short-term uncertainty rather than fundamentals, though volatility is expected to persist in the near term.



EXHIBIT B

INTERIM INVESTIGATION REPORT

SERIOUS INCIDENT TO SKYSWIFT AIRLINES PVT LTD.

BOEING 737-800 AIRCRAFT REGD. TM-NGK

SYNOPSIS

On 21st of June 2023, 04:47 hrs Indian Standard Time (11:17 UTC) , a SkySwift Airlines Pvt Ltd Boeing 737 TM-NGK operating a scheduled flight, SK 224, carrying 124 passengers at 5 crew from Aurelion International Airport (AON) for Lydon Airport (LXO) was involved in a serious incident of “runway overshoot” while touching down on runway (24/06) at LXO. The aircraft was under the command of ATPL holder, Capt. Kartik Krishnan and pilot monitoring was ATPL holder, F/O. Nehal Pendam.

INCIDENT

During the first approach into LXO, the aircraft encountered a severe wind shear in the latter stages of the approach, which resulted in an unstable approach profile. In view of the prevailing conditions, a go-around was initiated. The aircraft was subsequently repositioned for a second approach while adverse weather conditions continued to prevail and the runway remained water-contaminated.

On the second approach, the aircraft crossed the runway threshold at a higher-than-planned speed and altitude. Touchdown occurred significantly beyond the designated touchdown zone. By the time the long landing was recognised, a substantial portion of the 2,450-metre runway had already been consumed.

At this stage, a second go-around was assessed as not feasible due to insufficient remaining runway length and reduced engine response margins in heavy rain conditions. Maximum braking and reverse thrust were applied; however, the effectiveness of braking was adversely affected by the water-contaminated runway surface.

The aircraft was unable to decelerate within the remaining available runway distance and overshot the runway end. The aircraft subsequently descended beyond the runway end down the embankment associated with the table-top runway and sustained substantial structural damage.

DAMAGE TO PERSONS AND AIRCRAFT

INJURIES	CREW	PASSENGERS	OTHERS
FATAL	2	5	Nil
SERIOUS	3	70	Nil
MINOR	Nil	20	

Aircraft disintegrated into 2 halves post heavy contact with airport threshold wall and subsequent descent down the hill. Cockpit Voice Recorder and Flight Data Recorder have been recovered unharmed.

PREVAILING WEATHER CONDITIONS

Severe south-west monsoon thunderstorms with heavy convective rainfall at 63mm/hr coupled with variable wind at 230 to 310 degrees, gusting at 45+ kts. Wind shear warning: active. Microburst alert: Reported by preceding aircraft. Visibility: Rapidly fluctuating between 800m - 1200m.

CVR TRANSCRIPT

03:03 Hrs: Capt: *These red-eye flights are the death of me.* F/O: *Red eye...look at them...literally!*

03:19 Hrs: F/O: *I want my coffee as black as the clouds we'll endure on our descent.*

03:59 Hrs: Capt: <Yawns>

04:22 Hrs: ATC: *Cleared to land, Skyswift 224.* F/O: *Cleared to land, Skyswift 224.*

04:25 Hrs: Capt: *WINDSHEAR! T0/GA!* <engines immediately heard moving to full thrust>

04:27 Hrs: F/O: *Request to climb to 3000ft and hold pattern.* ATC: *Approved, Winds gusting at <inaudible>,* F/O: *Roger...<inaudible>*

04:36 Hrs: Capt: *Speed....F/O.....yeah...correcting* <slurred and delayed>

04:39 Hrs: Audio call out: *Approaching Minimums....Capt: Wipers...got it.*

04:43 Hrs: ATC: *Cleared to land, Skyswift 224.* F/O: *Cleared to land, Skyswift 224.*

04:46.11 Hrs: F/O: *TOO FAR DOWN! GO AROUND!* Capt: OH <expletives> *THE WALL.*

PROBABLE CAUSE OF ACCIDENT

Based on the evidence available at this stage of the investigation, it is *prima facie* assessed that the serious incident occurred due to fatigue-induced degradation of flight crew performance during the approach and landing phase of flight. Indications from the Cockpit Voice Recorder suggest reduced alertness, delayed responses, and diminished crew coordination, consistent with cumulative fatigue associated with prolonged night-time operations and inadequate rest.

The degraded performance appears to have contributed to ineffective management of approach energy during the second approach, resulting in the aircraft crossing the runway threshold at a higher-than-planned speed and altitude and touching down significantly beyond the designated touchdown zone. By the time the long landing was recognised, the remaining runway length was insufficient to safely discontinue the landing.

The approach and landing were conducted in severe south-west monsoon weather, characterised by heavy convective rainfall, active wind shear warnings, reported microburst activity, gusting and variable winds, and rapidly fluctuating visibility. These conditions led to runway water contamination and significantly reduced braking effectiveness, further eroding available performance margins.

Consequently, the aircraft was unable to decelerate within the available runway distance and overshot the runway end. The investigation is continuing to establish all contributory factors.

INTERIM SUGGESTIONS

Pending completion of the investigation, the following interim safety actions are proposed to mitigate the risk of fatigue-related flight crew performance degradation, particularly during night and adverse-weather operations:

Enhanced Rostering Controls: Immediate review and temporary restriction of consecutive night (“red-eye”) duties, with mandatory minimum rest periods exceeding regulatory minima for crews operating into performance-critical aerodromes.

Fatigue Risk Screening Prior to Dispatch: Introduction of a pre-flight fatigue self-declaration and supervisory assessment for flight crew, with clear authority to remove fatigued crew from duty without operational penalty.

Stabilised Approach Reinforcement: Re-emphasis through urgent flight operations bulletins on strict adherence to stabilised approach criteria, with mandatory go-around policies where parameters are not met.

Weather-Critical Aerodrome Safeguards: Additional operational briefing and enhanced decision-making thresholds for approaches into table-top and monsoon-affected aerodromes during night operations.

CRM and Fatigue Awareness Training: Immediate recurrent training modules focusing on fatigue recognition, cognitive degradation cues, and assertive intervention during high-workload phases.

Fatigue Risk Management System (FRMS) Review: Interim audit of the operator's FRMS to identify gaps in duty-time monitoring, circadian disruption management, and reporting mechanisms.

EXHIBIT C



GOVERNMENT OF TERRIA

OFFICE OF THE CIVIL AVIATION AUTHORITY OF TERRIA
TECHNICAL COMPLEX, AURELION INTERNATIONAL AIRPORT, AURELION

CIVIL AVIATION REQUIREMENT

SECTION 7 – FLIGHT CREW STANDARDS

SERIES J | PART III

ISSUE I | DATED: 01 March 2024

EFFECTIVE: 01 April 2024

File No.: CAAT-OPS/FDTL/03/2024

Subject:

Duty Period, Flight Duty Period, Flight Time Limitations and Prescribed Rest Periods for Flight Crew Engaged in Scheduled Air Transport Operations

1. INTRODUCTION

- 1.1. ICAO Annex 6, Part I, requires that the State of the Operator shall establish regulations for the purpose of managing fatigue. Accordingly, the State shall establish prescriptive regulations for Flight Time, Flight Duty Period, Duty Period and Rest Period limitations and, where applicable, regulations governing the use of a Fatigue Risk Management System (FRMS).
- 1.2. In order to enhance the safety of aircraft operations and pursuant to the findings of recent safety investigations involving scheduled international air transport operations, the Civil Aviation Authority of Terria (CAAT) has undertaken a review of existing flight crew duty and rest limitations.
- 1.3. In exercise of the powers conferred under ***Section 28 of the Civil Aviation Act, 1998 (Terria)*** read with ***Rule 42A and Rule 133A of the Civil Aviation Rules, 2002***, the following Flight Time, Flight Duty Period, Duty Period and Rest Period limitations

for flight crew are hereby issued for information, guidance and compliance by all concerned.

- 1.4. This CAR lays down prescriptive fatigue management regulations. Operators shall ensure that flight time, flight duty periods, duty periods and rest periods established by them remain within the limits prescribed herein.
- 1.5. The provisions of this CAR superseded all previous instructions, circulars, and communications issued by CAAT in respect of Flight Duty Time Limitations for flight crew engaged in scheduled air transport operations.

2. APPLICABILITY

2.1. This CAR is applicable to:

- All scheduled air transport operators registered in Terria; and
- All flight crew employed or engaged by such operators for domestic and international operations.

2.2. These provisions shall apply unless an operator has an FRMS approved by CAAT, in which case compliance shall be in accordance with the approved FRMS framework.

3. DEFINITIONS

Definitions shall be as prescribed in [ICAO Annex 6](#) and relevant CAAT regulations unless otherwise specified.

4. FLIGHT DUTY PERIOD LIMITATIONS

4.1. Maximum Flight Duty Period (FDP)

- a) The maximum FDP for flight crew operating international short-haul flights shall not exceed:
 - **10 hours** when the duty period commences between **0600 hrs and 1359 hrs**;
 - **9 hours** when the duty period commences between **1400 hrs and 2159 hrs**;
 - **8 hours** when the duty period commences between **2200 hrs and 0559 hrs**.
- b) FDP shall be reduced by **30 minutes** for each sector beyond the second sector.

5. FLIGHT TIME LIMITATIONS

5.1. Cumulative Flight Time

Flight crew shall not be scheduled or permitted to operate more than:

- **30 flight hours** in any **7 consecutive days**;
- **100 flight hours** in any **28 consecutive days**;
- **900 flight hours** in any **12 consecutive calendar months**.

6. REST PERIOD REQUIREMENTS

6.1. Minimum Rest

- a) Minimum rest preceding a flight duty period shall be the greater of:
 - **12 consecutive hours**, or
 - The length of the preceding duty period.
- b) Following operations involving night duties or time zone transitions exceeding **3 hours**, minimum rest shall be **14 consecutive hours**.

7. OPERATIONAL RESPONSIBILITY

- 7.1. Operators shall ensure adequate flight crew availability to absorb disruptions without exceeding prescribed duty and rest limitations.
- 7.2. High-frequency operations, peak-hour slot utilisation, or commercial considerations shall not be grounds for deviation from the requirements of this CAR.

8. TRANSITIONAL PROVISIONS

- 8.1. A **transition period of twelve (12) months** from the effective date of this CAR is granted to operators to achieve full compliance.
- 8.2. During the transition period, operators shall submit to CAAT:
 - Phased compliance plans;
 - Flight crew recruitment and training timelines;
 - Interim fatigue risk mitigation measures.

9. COMPLIANCE AND ENFORCEMENT

- 9.1. Compliance with this CAR shall be monitored through audits, inspections, and roster reviews.
- 9.2. Non-compliance beyond the transition period may attract regulatory action, including operational restrictions, in accordance with applicable law.
- 9.3 Where proceedings are instituted against an operator for regulatory non-compliance, the Authority may, without prejudice to its statutory enforcement powers, refer the matter to mediation to facilitate expedited resolution and ensure operational stability within the aviation sector. Such referral shall not amount to dilution of safety standards or waiver of regulatory authority, but shall serve as a structured mechanism to secure time-bound compliance while minimising systemic disruption. Mediation may be considered particularly where the concerned operator formally acknowledges the deviation, undertakes to rectify the same, and expresses willingness to adopt corrective measures within a defined framework. Any mediated resolution shall remain subject to oversight and may incorporate compliance milestones, monitoring mechanisms, and proportionate regulatory consequences where appropriate.

Sd/-
(Sanjay Verma)
Director General
Civil Aviation Authority of Terria

EXHIBIT D

Civil Aviation Authority of Terria



Flight Standards CAAT

Internal File Note

File No.: CAAT-22024/11/2023-FSD

Date: 05 January 2025

Subject: Review of Compliance Status with Revised Flight Duty Time Limitation (FDTL) Norms

1. The revised Flight Duty Time Limitation (FDTL) norms were issued vide ***CAR Section 7, Series J, Part III, Issue IV dated 15 March 2024***, with effect from ***01 April 2024***, providing a transition period of twelve (12) months ending on 31 March 2025.
2. A review of compliance status across scheduled air transport operators registered in Terria has been undertaken based on:
 - Compliance plans submitted to CAAT;
 - Roster inspections and audits;
 - Periodic operational data for calendar year 2024.

3. As on **31 December 2024**, the compliance position is as follows:

Category	Number of Operators
Total Scheduled Operators	11
Substantially Compliant	1
In Advanced Transition	7
With Material Deviations	3

4. Operators assessed as substantially compliant have revised duty rosters and operational schedules in line with the revised FDP and cumulative flight time limitations.
5. Aggregate data indicates:
- **46%** of international short-haul operations in December 2024 were conducted within revised FDP limits;
 - A **14% reduction** in extended duty instances compared to FY 2023–24;
 - Average flight crew strength across operators increased by approximately **11%** year-on-year.
6. The revised FDTL norms shall become fully applicable with effect from **01 April 2025**, upon expiry of the transition period.

Placed for record.

Sd/-

Joint Director (Flight Standards)
Civil Aviation Authority of Terria

EXHIBIT E

Daye F'ouza @df_terriafirst · Apr 11, 2025 · ...
SkySwift Airlines is in deep soup! Passengers are currently suffering the brunt of it, delays caused by ill-preparedness on the new pilot fatigue guidelines. SkySwift is profits first, pilots last. #skyswept @skyswift @DGCA_terria

4K 1K 740K ⬤

sumedhk @sumedhawaslate · Apr 11, 2025 · ...
this is ridiculous, i missed my flight and now i can't see the aujla concert @skyswift sooo lame.

5 38 ⬤

goyalshiv @boredlawstudent · Apr 11, 2025 · ...
I AM DEBARRED BECAUSE I MISSED MY FLIGHT. WILL SKYSWIFT PAY FOR MY NEW SEMESTER??? @skyswift

1 ⬤

nehalp @prawnshrih · Apr 11, 2025 · ...
i spent my night at nagpuria airport. i am so tired. please help me out, no flights back to ptown. @skyswift

⬤

kartik @karticked · Jun 1 · ...
is bluru duty free open? i am so hungry i havent eaten anything since my flight was delayed, and its been 13 hours. no updates. shame on you @skyswift

⬤

EXHIBIT F

TERRIA NATIONAL HERALD

3

12 AUGUST 2023

NATIONAL NEWS

FLIGHT DELAYS MOUNT AS NEW DUTY NORMS TAKE EFFECT; INTERNATIONAL SERVICES HIT

Arav Iyer

Aurelion: Flight delays and cancellations increased across several international routes from Terria over the past two weeks, as airlines adjusted operations following the end of the transition period for revised flight crew duty norms.

According to data compiled from airport authorities at Aurelion, Port Astra, and Northbay, an average of 18–22% of international departures experienced delays exceeding 60 minutes between 1 and 10 April 2025, compared to 9% during the same period last year. Multiple short-haul international flights were either delayed overnight or cancelled due to crew availability constraints, officials said.

A senior airport official at Aurelion International Airport confirmed that several cancellations were linked to crew duty limitations. “Flights were ready, but crews had reached prescribed duty limits. Airlines are still recalibrating schedules under the new framework,” the official said.

The revised Flight Duty Time Limitation (FDTL) norms, issued by the civil aviation regulator last year, became fully applicable on 1 April 2025 after a one-year transition period. The norms reduce permissible flight duty periods and mandate longer rest intervals for pilots, particularly on multi-sector and night operations.

Airline representatives acknowledged operational challenges but emphasised that safety requirements were being followed. “There is no compromise on safety. The disruptions reflect short-term adjustment issues as schedules and crew rosters are realigned,” a spokesperson for ClockAir Ltd. (a major carrier) said.

Passengers at Aurelion airport reported long wait times and last-minute schedule changes. One passenger stated – “My flight to Lydon was delayed twice and then rescheduled to the next morning, and there wasn’t an ounce clarity at the gate either.” Another added – “As it is I have lost trust in Air Terria. Now SkySwift too is being just as problematic. Can’t be bothered with these airlines!”

Industry analysts noted that carriers with high-frequency international operations were more exposed to disruption during the initial enforcement phase. “The impact is uneven. Airlines with denser schedules during peak hours are facing more pressure to meet duty norms,” an aviation analyst said.

The aviation regulator has not issued any public statement on enforcement action, but officials indicated that compliance with the revised norms is being monitored through routine oversight mechanisms.



CONTINUED FROM PG 1

National Railways Announces Fare Rationalisation

Terria National Railways on Tuesday announced a marginal revision in passenger fares, citing rising fuel and maintenance costs. While suburban and second-class fares will remain unchanged, long-distance premium services are expected to see an increase of 3–5 per cent from next month. The move has drawn mixed reactions, with commuter groups calling for improved service quality in return.

Government Unveils New Electoral Reform Bill

The Terrian government on Tuesday tabled a long-anticipated Electoral Reform Bill in Parliament, proposing stricter campaign finance disclosures and limits on digital political advertising. The ruling coalition said the bill aims to enhance transparency and curb misinformation ahead of next year's general elections. Opposition parties, however, criticised the timing, alleging the reforms could disadvantage smaller parties.



EXHIBIT G

ADVISORY ASSESSMENT REPORT

Civil Aviation Authority of Terria



Flight Standards CAAT

File No.: CAAT-22024/11/2023-FSD (Advisory)

Date: 20 January 2025

Subject: Assessment of Compliance Status of SkySwift Airlines Limited with Revised Flight Duty Time Limitation (FDTL) Norms

1. Reference

- 1.1. Civil Aviation Requirement (CAR) ***Section 7 – Flight Crew Standards, Series J, Part III, Issue IV***, dated ***15 March 2024***, effective ***01 April 2024***, prescribing revised Flight Duty Time Limitation (FDTL) norms.
- 1.2. Clarification Circular dated 10 April 2024, outlining expectations during the transition period.
- 1.3. Internal review of industry-wide compliance status as on 31 December 2024.

2. Purpose of Assessment

- 2.1. This report has been prepared to assess the compliance status of SkySwift Airlines Limited, in view of the expiry of the transition period on 31 March 2025, and to examine operational data relating to adherence to revised FDTL requirements.

3. Compliance Status Overview

- 3.1. SkySwift Airlines Limited submitted its phased compliance plan on ***28 May 2024***, outlining progressive alignment with revised FDP and cumulative flight time limits.
- 3.2. Subsequent reviews of rosters and operational data for ***October–December 2024*** indicate that SkySwift has achieved partial alignment with the revised norms, with material deviations persisting in certain operational segments.
- 3.3. The deviations primarily relate to:

- International short-haul operations involving multi-sector duties;
- Peak-hour departures from congested metro airports;
- Instances of FDP extension approaching revised upper limits.

4. Operational Indicators

- 4.1. Analysis of operational data between 01 and 15 January 2025 indicates:
 - A higher incidence of crew unavailability-related delays on SkySwift-operated international flights compared to industry average;
 - Multiple flight delays exceeding 90 minutes attributed to *crew duty time exhaustion*;
 - Limited standby crew availability during early morning and late-night operations.
- 4.2. These indicators suggest that SkySwift's current crew strength and roster configuration remain under strain in the context of full enforceability of the revised norms.

5. Comparative Context

- 5.1. As per industry-wide data, the majority of scheduled operators have realigned schedules, reduced sector density, or augmented crew strength to mitigate fatigue-related risks.
- 5.2. SkySwift's pace of alignment appears slower relative to similarly placed operators with comparable international network profiles.

6. Observations

- 6.1. The present assessment does not indicate deliberate non-compliance; however, the persistence of material deviations beyond the transition period reflects delayed operational convergence with the revised regulatory framework.
- 6.2. Continued deviation may:
 - Exacerbate operational disruptions;
 - Impact passenger confidence;
 - Undermine uniform application of fatigue mitigation standards.

7. Advisory Note

- 7.1. It is advised that SkySwift Airlines Limited be formally communicated regarding:
 - The observed delay in achieving full compliance;
 - The expectation of immediate corrective measures;
 - The requirement to submit an updated, time-bound compliance roadmap.
- 7.2. This assessment is advisory in nature and is placed on record for regulatory consideration.

Prepared for internal use.

Sd/-

Joint Director (Flight Standards)

Civil Aviation Authority of Terria

EXHIBIT H

To	regulatory.affairs@skyswiftair.tt
Cc	ceo.office@skyswiftair.tt; legal@skyswiftair.tt
Subject	Show Cause Notice regarding Compliance with Revised Flight Duty Time Limitation (FDTL) Norms

Dear Madam/Sir,

This is with reference to the revised Flight Duty Time Limitation (FDTL) norms issued by the Civil Aviation Authority of Terria (CAAT) vide Circular No. **CAAT-OPS/FDTL/03/2024** dated 15 March 2024, and the subsequent notification granting a transition period of one year for compliance.

It has come to the notice of the CAAT that, while several scheduled airlines have aligned their operations with the revised FDTL requirements within the prescribed transition period, certain aspects of SkySwift Airlines Limited's flight operations continue to reflect deviations from full compliance with the said norms, particularly in relation to crew duty scheduling and rest periods on international short-haul operations.

The revised FDTL norms were introduced pursuant to safety considerations and in alignment with international best practices, with the objective of mitigating fatigue-related risks and ensuring passenger safety. The transition period provided was intended to enable airlines to undertake appropriate manpower planning, recruitment, and operational restructuring.

In light of the above, SkySwift Airlines Limited is hereby called upon to show cause, within **seven (7) days** from the receipt of this notice, as to:

1. The reasons for non-alignment with certain provisions of the revised FDTL norms beyond the stipulated transition period;
2. The steps taken by the airline towards achieving full compliance, including recruitment, training, and crew planning measures; and

3. The proposed timeline within which SkySwift Airlines Limited intends to achieve complete conformity with the revised regulatory framework.

Please note that if no cause is shown to this notice within the prescribed time against the action proposed to be taken and also if the noticees do not appear before the adjudicating authority when, the case is posted for hearing, the same will be decided ex-parte on the basis of the facts and evidence available on record.

You are requested to submit a detailed written response along with any supporting documentation that you may wish the CAAT to consider. The present notice is issued without prejudice to any further action that may be taken by the CAAT under the Aircraft Act, 1934 and the rules and regulations framed thereunder.

The CAAT reiterates that the objective of the regulatory framework is to ensure aviation safety while maintaining operational stability, and looks forward to constructive engagement in this regard.

Yours faithfully,

Sanjay Verma

Director General

Civil Aviation Authority of Terria

Government of Terria

 dg.caat@gov.in



EXHIBIT I

To	dg.caat@gov.tt
Cc	flightstandards.caat@gov.tt; legal.caat@gov.tt; legal@skyswiftair.tt
Subject	Reply to the Show Cause Notice

Dear Sir,

We acknowledge receipt of the Show Cause Notice issued by the Civil Aviation Authority of Terria (“CAAT”) concerning compliance with the revised Flight Duty Time Limitation (FDTL) norms. At the outset, SkySwift Airlines Limited reiterates its unequivocal commitment to aviation safety and recognises the critical role of fatigue risk management in ensuring safe flight operations. The airline does not dispute the objectives, validity, or necessity of the revised FDTL framework.

Without prejudice to the above, and in response to the queries raised in the Show Cause Notice, SkySwift respectfully submits that the delay in achieving complete alignment with certain aspects of the revised FDTL norms has arisen due to the following cumulative factors:

1. *Industry-Wide Pilot Availability Constraints*

The implementation of the revised FDTL norms coincided with a significant shortage of type-rated pilots across the sector, particularly for international short-haul operations, which limited immediate roster restructuring despite ongoing recruitment efforts.

2. *Unanticipated Aircraft Groundings and Operational Disruptions*

Temporary grounding of aircraft due to engine-related issues and supply chain delays materially impacted fleet availability, resulting in higher crew utilisation intensity during peak operational periods.

3. *Peak-Hour Airport Congestion and Slot Rigidity*

Operations at congested international and metro airports during peak hours constrained flexibility in rescheduling flights and reassigning crews without causing cascading delays and cancellations.

4. *International Schedule Commitments and Bilateral Obligations*

SkySwift’s international operations are closely linked to India’s bilateral air service

entitlements and code-share arrangements, where abrupt curtailment of services risked under-utilisation of sovereign traffic rights and disruption of partner airline confidence.

5. ***Transition Period Overlap with Seasonal Traffic Surge***

The final phase of the transition period overlapped with a pronounced seasonal surge in passenger demand, further compressing the airline's ability to absorb immediate operational changes without large-scale passenger disruption.

During the transition period, SkySwift undertook several compliance-oriented measures, including accelerated pilot recruitment, expansion of simulator and training capacity, and progressive reconfiguration of crew duty rosters. However, the convergence of the above factors rendered immediate blanket compliance operationally impracticable without significant adverse impact on passengers and international operations. SkySwift respectfully submits that the present situation does not stem from any unwillingness to comply with the revised FDTL norms, but from practical constraints in synchronising safety compliance with systemic operational realities.

In the interest of ensuring aviation safety while maintaining systemic stability, SkySwift proposes a structured engagement with the CAAT to explore a phased, time-bound compliance roadmap, supported by enhanced oversight and transparency. The airline is prepared to place before the CAAT, or an appropriate neutral forum, detailed commitments relating to recruitment milestones, fatigue risk mitigation measures, and independent audits.

Accordingly, SkySwift requests the CAAT to consider referring the matter for structured mediation under an appropriate institutional framework, without prejudice to the CAAT's regulatory authority. We remain committed to working closely with the CAAT to achieve full regulatory conformity while safeguarding passenger interests and India's international aviation commitments.

Yours faithfully,

Rohan Malhotra

Chief Executive Officer, SkySwift Airlines Limited

 ceo.office@skyswiftair.in



