To

The Secretary
Competition Commission of India
9th Floor, Office Block - 1
Kidwai Nagar (East)
New Delhi, 110023, India

11th August, 2026

Representation to the CCI on Indigo case

Dear Sir/Ma'am,

We write in reference to the public consultation held by the CCI on the commitment Proposal received by it in Case No. 44 of 2025 (Indigo case).

Please find attached our representation on the matter.

About the Centre

The Centre for Competition Law and Economics (CCLE) is a research organization working in the field of competition law and economics. The Centre publishes research reports, conducts training activities and assists litigating parties at competition fora across the country to advocate consistent interpretation of the Indian competition law. The Centre regularly collaborates with national law universities and other non-profit organizations to organize seminars, conferences and workshops for the relevant stakeholders to generate capacity in the said field based on mutual interest.

We would be happy to discuss more on the topic and will be looking forward to meeting you in person.

Best Regards,
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Public Comments on the Application filed by InterGlobe Aviation Ltd. in Case No. 44 of 2025 at the CCI

Introduction

1) The Competition Commission of India (CCI) vide its order dated 4th February, 2026 initiated an inquiry against Interglobe Aviation Limited ('Indigo'). The Commission held the company in *prima facie* violation of the law for: (a) locking-in consumers through last minute cancellations and providing no alternative despite dominance; (b) withholding its service from the market and creating an artificial scarcity and limiting consumer access to air travel during peak demand.

Commitment application and response

2) Indigo has now filed a commitment application with the CCI to close the matter. The response against each proposal is mentioned in the below table.

C. No.[1]	Commitment	Response
0	All impacted passengers were given the option to reschedule their travel on alternative IndiGo flights at no additional cost or to receive a full refund.	- This is against the facts as mentioned in the PF order. - The Commission should verify this information on its own, or with the DGCA. - Suitable communication to be made to the company.
0A	In addition to the refunds, IndiGo offered compensation to eligible passengers as per applicable DGCA Civil Aviation Requirements (CARs).	- The commission should verify the CARs. This may or may not address the competition concerns. - This compensation has to duly reflect the market realities in terms of the money

[1] Commitment number

		lost, opportunities foregone and any kind of mental agony and stress caused.
0B	Over and beyond this, IndiGo also extended a Gesture of Care (GoC) voucher of INR 10,000 (valid for 12 months) to severely impacted passengers.	- This may be factually correct information. - The Commission should conduct an assessment whether this amount reflects the market reality as on the face of it, the Informant lost more money due to the cancellation. This is outstanding underlying opportunity cost and mental agony. - Accordingly, this submission should be accepted or rejected.
0C	Further, in line with the DGCA's findings and directions, IndiGo has taken additional steps to improve operational planning, strengthen system reliability, and enhance internal controls, with the objective of minimizing the likelihood of similar disruptions in the future.	- This needs to be verified with the DGCA. - This addresses competition concerns to an extent.
1	In the event of a Large-scale Disruption, IndiGo will constitute and operationalise a Crisis Management Group (CMG), virtually within 15 (fifteen) minutes who will then be present physically in the Command Centre within 1 (one) hour. The CMG	- This addresses competition concerns to an extent.

	will comprise heads of Operations, Safety, Crew, Engineering, IT, Customer Experience and Communications. The CMG will operate under a clearly defined escalation matrix and decision-making framework during operational contingencies. It will ensure round-the-clock leadership availability during such Large-scale Disruptions. Mock drills will be conducted periodically to evaluate the effectiveness of the same.	
2	During a Large-scale Disruption causing cancellation of flights, IndiGo will undertake measures for planning and executing network adjustment to ensure regularization of operations post such a Large-scale Disruption. IndiGo will release the associated domestic landing and departure slots to the relevant airport operators/authority for a limited period. The process of handing back these slots may differ	- This addresses competition concerns to an extent.

	depending on the duration between time of execution of cancellation and the date of departure. Post such handover, the airport operator/authority may determine the reallocation of such slots/dates for routes, as deemed fit.	
3	IndiGo will further strengthen passenger handling and assistance policy. IndiGo will also onboard additional vendors at various airports to ensure adequate provision of meal boxes, water and surface transport for the passengers.	- This addresses competition concerns to an extent.
4	In the event of a Large-scale Disruption, IndiGo will offer the following at no additional cost: a) Alternative flights at no additional cost. To the extent possible, IndiGo will offer all affected passengers alternative flights within 48 (forty eight) - 72 (seventy two) hours of their originally scheduled travel time at no additional cost,	- This addresses competition concerns to an extent.

	thereby ensuring that the affected passengers are not required to bear any fare difference and are protected from increase in price; b) Automatic refunds and compensation. Where passengers do not accept such alternative arrangements for any reason (including medical or other exigencies), or where IndiGo is not able to provide an alternative flight, automatic refunds will be processed within a defined timeline. Further, affected passengers will also be eligible to receive compensation as per the applicable DGCA CAR. c) Meals. Meal boxes and water shall be distributed free of charge to passengers who have already checked in at the airport in a timely manner. d) Hotel accommodation. IndiGo will provide	

	hotel accommodation and local conveyance for the affected passengers who were either booked on IndiGo's connecting flight, or are not local residents of the relevant origin airport. e) Surface Transport. Wherever feasible and basis the preference of the passengers, IndiGo shall provide surface transport to facilitate the passengers to reach their destinations. f) Priority support for passengers with special needs. IndiGo shall provide priority support to the following passengers: i. Unaccompanied Minor (UNMR); ii. Blind passengers; iii. Wheel Chair bound passengers with any disability or medical condition; and iv. To the extent possible, any other passenger with medical	

	emergencies. In addition to the above, during a Large-scale Disruption, IndiGo will not charge fares from passengers making fresh bookings beyond the tariff ranges filed with the DGCA in the most recent tariff filings until such a Large-scale Disruption period has passed and capacity has been restored.	
5	IndiGo will establish a dedicated passenger grievance redressal cell for complaints relating to Large-scale Disruptions. A dedicated Customer Experience (CX) War Room, manned 24~7 during Large-scale Disruptions, will be activated to assist the affected customers. The CX War Room shall be activated simultaneously with the activation of the CMG. The mechanism will include time-bound resolution metrics where IndiGo shall endeavour to resolve the complaints within an average time of 48 (forty eight) to 72 (seventy two) hours.	- This addresses competition concerns to an extent.

Overall response

3) As per the available information, IndiGo has paid a fine of INR 22 crore to the DGCA as part of the regulatory action. It is suggested that the Commission should direct the company to furnish details of all the affected passengers and conduct an assessment of the loss caused as per response to commitment number 0B. Once this assessment is made, the Commission should ensure compensation to these consumers either through consultation with the DGCA or with the company.

4) The Commission should also consult the DGCA and other nodal departments in terms of what structural measures could be taken to promote competition in the airline industry. This might involve measures on market entry, market study on ancillary markets and submitting stakeholder feedback response.