RCL/TRAI/LT/11-12/1738
25th June, 2012

**Dr. Rahul Khullar**
**Chairman**
Telecom Regulatory Authority of India,
Mahanagar Door Sanchar Bhawan,
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New Delhi – 110 002

**Subject:    Comments on Consultation Paper on "Telecom Network Failures during Emergencies/Disasters –Priority Routing of Calls of Persons Engaged in 'Response and Recovery'**

Dear Sir,

Please find attached RCOM response to the TRAI Consultation Paper on "Telecom Network Failures during Emergencies/Disasters –Priority Routing of Calls of Persons Engaged in 'Response and Recovery'.

We hope the Authority would find merit in our suggestions and take these into account before taking final decision on this issue.

Thanks & regards,

For **Reliance Communications Ltd.**

**(Authorised Signatory)**

Please Reply to:      Sh. Amit Mathur
                      Sr. Vice President
                      Fax: 30331781

CC :    Shri. R. Ashok, Member, TRAI
        Shri. R. K. Arnold, Member, TRAI
        Shri. Rajeev Agrawal, Secretary, TRAI
        Smt. Anuradha Mitra, Pr. Adv. (FA & IFA)
        Shri. Sudhir Gupta, Pr. Adv. (MS)
        Shri Sanjeev Banzal, Advisor (MN)

## Comments on Consultation Paper on "Telecom Network Failures during Emergencies/Disasters – Priority Routing of Calls of Persons Engaged in 'Response and Recovery'

1. Reliance Communications Ltd (RCOM) welcomes the opportunity to comment on such an important issue of emergency and disaster management services.

2. RCOM appreciates and fully understands that in emergency and disaster situations, communications plays an important role. The timely deployment and use of telecommunication resources play a crucial role in disaster mitigation and relief operations specially in a country like India which is prone to natural disasters like floods, earth-quakes, coastal cyclones etc on one hand and manmade disasters like accidents, terrorist attacks etc on other.

3. Wire line telephones can also be considered for emergency deployment in and around disaster sites which can augment existing mobile networks for emergency communications. It would be much faster to provision emergency wire line connections from POPs nearest to the emergency sites rather than trying to restore and repair damaged cell sites. Also, wire line networks have substantially more capacity than mobile networks for carriage of voice and data.

4. In view of creating processes and structures to ensure reliable means of communications during disasters/emergencies, we will be grateful to the TRAI for giving us prospect to comment on emergency services.

**Main issues of Consultation paper are:-**

<span style="color:red">a) Should there be a direction from regulator on the network dimensioning - both for operating in normal as well as emergency situations?</span>

**Reply:**

(i) **No, there should not be any direction from regulator or licensor on network dimensioning.**

(ii) The learning from past emergency and disaster situations, it is observed that emergency situation may NOT happen throughout the network at the same time, but will happen in different pockets. While over dimensioning of network can take care of the sudden increase in traffic to an extent during emergencies. The traffic volumes during times of natural disasters or emergencies cannot be predicted and will vary based on situation. It would

be almost impossible to correctly dimension the network to take care of all cases of emergencies.

(iii)     Further, it may be noted that there is huge cost involved in over-dimensioning of network which would substantially increase cost. This will have adverse implication on tariffs, network expansion, up gradation etc.

b) In your opinion, which of the three possibilities as discussed in Chapter IV? i.e

(i) Solutions based on combination of MTPAS of UK and GETS of US

(ii) Solution based on MVNO concept

(iii) Solution based on eMLPP would be best suited for implementation in India and Why? In case there is any other methodology that is suggested, the details of the same may be provided?

**Reply:**

(i)     We suggest a solution based on eMLPP would be best suited for implementation in India for GSM/3G. As, eMLPP is a Standards based solution and it will be advantageous for operators to work towards it.

(ii)     For CDMA, we suggest WPS solution as it is being used in USA. However, detailed feasibility study is required to implement WPS solutions on existing network.

c) Is priority call routing for certain users based on Enhanced Multi- Level Precedence and pre-emption service (eMLPP) possible in intra operator and inter-operator scenario in your network?

(i) If yes, provide the detail methodology that you will suggest for its implementation in India.

(ii) If no, please indicate the time and costs required to upgrade your network and implement the same in your network.

**Reply:**

Inter-operator is possible once there is standards based implementation. Inter-operator between CDMA and GSM/ 3G does NOT appear to be feasible. Presently RCOM is working on the solution with various vendors. The switch interworking will depend on the 'Priority and Pre-emption' indications used in the ISUP of the specific switch. At least 3 to 4 months are required to have clear view on the feasible solution.

d) Which organizations and government departments that are involved in 'response and recovery' during emergency situations do you think should be part of this scheme?

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e) What mechanism should be followed to identify which personnel working in organizations identified in Q5.4 above should get priority routing?

**Reply:**

The government should setup a Disaster Management (DM) cell, who should decide on which organizations and which persons in those organizations should have priority access and priority routing.

f) In your opinion should there be a separate Unit/Division under DoT / TRAI to monitor the implementation of the scheme. If yes, what should be the structure and role of this unit?

**Reply:**

In our opinion, TERM cell in DoT should continue to monitor all such implementations.

g) In your opinion what can be the major bottlenecks in service delivery of priority call routing?

**Reply:**

We anticipate following major bottlenecks in service delivery of priority call routing:

- The requirement of "Specialized Mobile Stations" for emergency services should be considered.

- Modification is required in SIM for additional table of priorities as per 3GPP standard.
- Inter-operator in multi-vendor Network Element environment.
- Inter/ Intra-operator between CDMA and GSM/3G may not be technically feasible.

**h) How should the service delivery model for implementing the priority call routing be designed?**

**Reply:**

Since, the SIM card change is necessary for implementing the priority call routing, pre identification of the personnel requiring priority routing will be required. These personnel should have mobile phones supporting the eMLPP. Pre identification is required as it may not be possible to provide SIMs and handsets at the time of Emergency.  The provisioning in HLR will be required for activating the service.

**i) What charges, if any, should be levied from the users for availing the facility of priority call routing? Please justify your answer.**

**Reply:**

(i)     In our opinion, the following charges should be levied from the users for availing the facility of priority call routing.

- One time activation fee

- Monthly service fee

- Additional per min call charges

(ii)    Tariff should be under forbearance

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