



18th Apr 2013

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Advisor (NSL)
The Telecom Regulatory Authority of India,
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Idea Cellular's response to the TRAI Consultation Paper on "Universal Single Number Based Integrated Emergency Communication and Response System"

Sir,

This is with reference to the Authority's invitation for comments on the above-mentioned Consultation. Idea Cellular has always supported customer-friendly endeavors and believes that the initiative to have a single universal number based integrated emergency communication and response system will facilitate faster access for people in distress and help mitigate the agony and anxiety generally experienced under such situations.

While we fully support such initiatives, we have the following comments:

- a. Idea Cellular anticipates that such an Integrated Emergency Communication and Response System is likely to have some very real challenges in implementation due to the associated issues of providing location, interconnection / IUC, etc. In view of the same, Idea Cellular would like to urge the Authority to take note of all such highlighted issues, the details of which are mentioned further on in our response.
- b. Although the consultation document provides a broad outline of IECRS, we are concerned that certain features like the PSAP architecture and onward delivery of calls to control rooms from the PSAP have not been given sufficient attention. We therefore urge the TRAI to be more explicit about the afore-mentioned issues and to commit to making the model publicly available. Thereafter it can seek inputs and insights of all stakeholders to be able to formulate a final opinion.

As regards our issue-wise submissions on the Consultation Document, the TRAI may kindly note that Idea Cellular generally agrees with the views expressed by COAI and would like to reiterate the following key points.

- ✓ The types of emergency services that should be made available through single emergency number should be all level '1' emergency services like Police, Fire, Ambulance, Women helpline, etc.
- ✓ We agree with the TRAI's view that 100 is currently a much known number, hence the most preferred number for this.
- ✓ The database concerning information about subscribers should be a centralized database at a circle level.



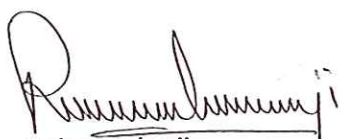
- ✓ It is critical that the TRAI take note of the fact that there are technical issues involved in the transfer of location of a mobile user in real time. Further, being able to provide location details of roaming subscribers is technically not a feasible option.
- ✓ Idea Cellular support the location information standards desired under the ECGI methodology.
- ✓ Emergency number access should be allowed from handsets with valid SIMs only
- ✓ Emergency access can be allowed through SMS and PSAP can use the pull based mechanism to get location details, whenever required. However, emergency access from e-mails should not be allowed
- ✓ Prioritization of calls to emergency access number is subject to technical feasibility. However, interface to PSAP should be dimensioned to provide no congestion for emergency calls..
- ✓ We believe that there should be some deterrent for callers making Hoax or fake calls to emergency numbers
- ✓ PSAP should be mandated to provide opportunity of connectivity separately to each operator since emergency services are license conditions for all operators. Direct connectivity would ensure minimal issues related to inter-operator billing, charging and settlements and would also avoid an extra leg of connectivity which could lead to inter-operator call congestion issues.
- ✓ Finally, the Consultation Document does not offer details on the architecture and the functioning of the PSAP. However, there are many related issues that can only get discussed once such details are available to the stakeholders. In view of the same, we request the Authority to share details on the architecture and functioning of the PSAP before finalizing any recommendations.

We are confident that the Authority will give due-consideration to our afore-mentioned comments before formalizing any further opinion on the issue.

Thanking You

Yours faithfully,

For IDEA Cellular Limited.



Rajat Mukarji
Chief Corporate Affairs Officer