MTS response on "TRAI Consultation paper on Universal Single Number Based Integrated Emergency Communication and Response System"

At the outset, we welcome the opportunity given to comment on the issues raised in consultation paper on Universal Single Number Based Integrated Emergency Communication and Response System.

Our issue wise submission is as herein below:

Q1. **What are the types of emergency services that should be made available through single emergency number?**

We believe that all the support services should be accessible through single emergency number as required by a user in case of emergency, be it police, fire brigade, Ambulance, women help line, child help line or approaching security agencies for intimation of unidentified articles or anti-social elements etc.

Q2. **What universal number (e.g. 100,108 etc) should be assigned for the integrated emergency communication and response system in India?**

We are of the view that any one number among 100, 101, 102 or 108 can be used as universal number as these numbers are preprogrammed in SIM-User Tool Kit as emergency number. Any change in number would require a change in SIM-User Tool Kit which would not be possible in SIMs already in use with subscribers or the SIM stock in market.

Q3. **Should there be primary / secondary access numbers defined for the integrated emergency communication and response system in India? If yes, what should these numbers be?**

No, there should be one access number for IECRS, although Routing can be done on primary & secondary locations as required.

Q4. **For implementing single number based Integrated Emergency Communication and Response System in India, should the database with information of telephone users be maintained by the individual service providers or should there be a centralized database?**

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Q5. **In case of centralized database which agency (one of the designated telecom service provider, a Central Government department or a designated third party) should be responsible for maintaining the database?**

The above mentioned options being complex in nature, would require feasibility study, data work flow & routing, corresponding IT development and POC by the Government before finalizing the recommendations. We, therefore, feel centralized database maintained by DOT or TRAI should be appropriate.

However database access to be provided through secure access to the pre-defined users with controlled access rights.

Q6. **What are the technical issues involved in transfer of location of a mobile user in real time?**

The technical Issues involved in transfer of location of a mobile user in real time which would require development cost, testing & implementation time:

- Interface with network nodes & query format
- Response format to query & information in query response
- Integrating the response content with IECRS system database(i.e., coordinate mapping to map database to locate the mobile user)
- API integration & bandwidth cost to be borne by central/state agency

Q7. **What accuracy should be mandated for the location information to be provided by the mobile service provider?**

The accuracy would depend upon the available/deployable network technology for location information of the user.

Q8. **Should emergency number access be allowed from inactive SIMs or handsets without SIMs? Please justify your answer.**

It is suggested that for security reasons, the emergency number access should not be allowed for inactive SIMs and handsets without SIMs. If at all there is a need then the following may be considered:

Inactive SIMs: Emergency access may be allowed.

Handsets without SIMs: Not to be allowed because it would result in hoax call & there is no identity of such calls to back trace.

Q9. **Should emergency access be allowed through SMS or email or data based calls? If yes, what will be the challenges in its implementation?**

It can be tested in phase-2 depending upon development/integration time/cost.

Q10. **Is it technically possible to get Location information in case of SMS or data based calls on real time basis? If yes, please elaborate the process and technical challenges if any.**

It is not technically available & this would need additional development & implementation cost based on the architecture.

Q11. **How to build redundancy in operations of Centralized response centers or PSAPs as they may be vulnerable to attack – both Physical and Application software related (Virus, Malware, denial of service, hacking) or to Network failures or Congestion i.e. Call Overload?**

The geographical redundancy needs to be built at Centralized Response Center in terms of disaster recovery site in active-standby or active-active load sharing configuration to take care of physical or network failure or congestion or call overload.
The suitable firewalling or security measures (anti-virus software) to protect the IECRS set up from unauthorized access or virus attacks.

Q12. Should all the calls made to universal emergency number be prioritized over normal calls? Please justify your answer.

This would be a bit challenging & would require EPACA/MLPP implementation in the network which is not yet available for end to end implementation.

Q13. What legal/penal provisions should be made to deal with the problem of Hoax or fake calls to emergency numbers?

The hoax calls should be considered as an offence and TRAI may decide suitable legal provision for addressing hoax calls. TRAI should bring out legislation to make hoax call an offence as per the applicable legal framework.

Q14. How should the funding requirement be met for costs involved in implementation of IECRS? Should the cost be entirely borne by Central/State Governments or are there other possible ways to meet the funding requirements?

The entire cost should be borne by Central/State Governments.

Q15. Should Key Performance Indicators (KPIs) related to response time be mandated for PSAPs? If yes, what should be the KPIs? Please justify your suggestions.

The KPIs to be finalized based on the implementation and conducting trials for observing the situation practically.

Q16. Should use of language translation services be mandated for PSAPs?

Yes, suitable arrangement to be done at PSAPs end either automated or manual.

Q17. In your opinion, what issues related to interconnectivity and IUC may come up in implementation of IECRS in India? What are the suggested approaches to deal with them?

All operators to be mandated to connect directly with IECRS local PoP in respective telecom service area which does not require any IUC.

Q18. Should a separate emergency number for differently able persons be mandated in India? How the use of this number be administered?

A separate emergency number for differently able persons may be mandated & its administration needs to be further discussed.

Q19. In your opinion, apart from the issues discussed in this consultation paper, are there any other technical, commercial or regulatory issues that may be involved in implementation of IECRS in India? Please elaborate.

We feel that almost all the major issues are already included / covered in the above points.