

FEEDBACK ON TRAI'S CONSULTATION PAPER ON 'UNIVERSAL SINGLE NUMBER BASED INTEGRATED EMERGENCY COMMUNICATION AND RESPONSE SYSTEM(IECRS) - MEGHALAYA

CHAPTER-4

SUMMARY OF ISSUES FOR CONSULTATION

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

Police, Fire, Health/Ambulance, Local emergency, Disaster (Natural & man-made), Crime (Pre/During/Post), Coastguard, Defence, Rescue.

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

The number should in multiple/ repetition viz. 111, 999 for ease of dialling.

Alternately, a secondary /parallel number may be allotted, in case any of the keys /number is not functioning during crisis.

Reason: 3 digit nos. are the most popular number in India for calling Police.

4.3 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?

Yes.

Reason: Secondary number may act as a complementary to the primary number during crisis. Like already in place in UK and Australia, the calls from secondary numbers will again be routed to the primary response number.

4.4 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?

Centralized database.

4.5 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?

BSNL or any designated third party by the Central Government.

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

If users without Subscriber Identification Module (SIM) are allowed to make calls to IECRS, the location will not be available in real-time of such users.

For SIM users, there is primarily no technical issue involved in real-time transfer of location of mobile user.

The only constraint is exact pin-pointing unlike a GPS device as compared

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

Accuracy pin-pointed on map level (with street detail) needs to be mandated.

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

Yes

Reason:

1.The IECRS being a emergency response system at a national level for the citizens of India, it may not be bounded and limited to users only with active SIM connections.

2. Emergency circumstances may be encountered by any citizen irrespective of whether his SIM / phone connection is active or not. (Earlier when mobiles were not available, there have been several instances where Land-lines have been disconnected by the perpetrators of crime before committing crime).

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

Yes

Challenges: In such instances, caller should pro-actively get him/her-self identified and reveal the location and instance summary, as identifying the exact physical location may be challenging.

4.10 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.

Yes, SMSes / data calls may be traced based on the log records from the MSCs of the TSPs.

Even if it is not technically feasible presently, steps may be taken to upgrade the technical resources. This is of prime importance as it will benefit the hearing and speech impaired citizens.

Present infrastructure (in terms of Hardware & Software) may require to be assessed in order to ascertain real-time location information based on SMA and data calls.

4.11 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?

a. Replica servers may be stationed at several locations across the country.

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

Yes

Reason: Being it an emergency call, prioritizing it over normal calls is obvious.

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

- a. Hoax/fake callers may be subjected to levy of penalty or imprisonment.
- b. Relaxation should be provided to callers in line with exceptions /provisions thereto as under Chapter IV of the Indian Penal Code,1860.

4.14 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?

Funding requirements may be borne entirely by the Central Government.

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

- a. 90% of calls to be answered in less than 10 seconds.
- b. 100% of calls to be answered in less than 20 seconds.
- c. In any 1 hour, not more than 1% of calls should encounter busy/waiting signal.
- d. Call Tree (Each call step & Total call step elapsed time)
- e. Un-answered calls (Target=0%)
- f. Call back (in case of missed calls) (Target=100%)
- g. Time in pin-pointing exact location
- h. TAT in intimating concerned department by the PSAP.
- i. Response time of the department. (Total time elapsed between first call from citizen and call reaching the concerned department/agency).

4.16 Should use of language translation services be mandated for

PSAPs?

Yes

4.17 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?

Issues include:

- a. Concerns that may come up from Telecom Service Providers (TSPs) on the financial terms of interconnection applicable for IECRS calls. (including Origination, Transit, Carriage, and Termination).
- b. Seemingly low negotiating power of new TSP entrants.

Suggested approach bases:

- a. Detailed costing analysis of network elements
- b. Appropriation of costs to services
- c. Fair return to the network owner
- d. Incentive to small and new operators
- e. Welfare of consumers
- f. Provision to include Transit charges which may be required during exceptional situations emergency breakdown/overflow traffic.

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

No.

However in addition, to the emergency number, a parallel instant SMS / in line with fake-call enabled functionality may be imbibed in the mobile communication equipment to better equip differently-abled persons.

4.19 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.

Technical: If users without valid and active Subscriber Identification Modules (SIM) are allowed to call, issues in tracking physical location.

Commercial: <>

Regulatory: <>