

Sir,

Counter-comments on some of the suggestions received by TRAI wrt IECRS are placed below.

Best regards,

Monish Gulati

Counter Comments

1.	Issue	Q2 What universal number (e.g. 100,108 etc) should be assigned for the Integrated Emergency Communication And Response System in India? 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?
	Comment	Since public awareness in India is high for 100 as an emergency number (Span),cost of creating awareness (Persistent), would require unlearning(TATA). It does not matter which number is kept as Universal Number as long as a strong strategy for generating awareness and education is put into place (NDMA).
	Counter-Comment	The following may be also considered: (a) Numbers 100,101 ect at present represent control rooms of respective emergency service providers. They may like to retain them for coordination and administrative purposes. (b) As stated by TATA the process of introduction of IECRS may be phased over the country, pilot projects may also be launched initially. An emergency number other than one in use may be more suitable in this regard. (c) This may be an opportunity to harmonize with international practice and choose 112. (d) Public awareness should not be an issue in a country where every new emergency spawns a new contact number- SARS emergency ect.
2.	Issue	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?
	Comment	Providing timely and reliable emergency services is an

		Obligation that only the Government is in a position to fulfill towards society. IECRS should ideally be funded from the already accumulated USO fund (Span, NDMA ect). Alternatively, it could be funded based on a monthly charge viz. Re.2/---levied as a security charge on each subscriber.(Span). Cess (NDMA), Interconnection costs(TATA), Tax rebates, Staffing of PSAP, new vehicle purchases, traffic violations (Persistent),
	Counter-Comment	USOF for CAPEX for telecom hardware. Cess for OPEX and PSAP related expenditure. It is not a very bright idea to fund teleco expdr from vehicle purchases. DoT should take up case with Finance Ministry to provide/reimburse 3% of service tax on telecom as IECRS cess/levy.
3.		Access for Disabled. As stated by NDMA issue is of access to emergency number, a separate number is not a solution. In this regard it is important to consult handset manufacturers and make provisions for access by persons with disability accordingly.