O MTS a step ahead

The Advisor (MN)
Telecom Regulatory Authority of India
Mahanagar Doorsanchar Bhawan,
Jawahar Lal Nehru Marg,
New Delhi – 110002.

Kind Attn :   Mr. Sanjeev Banzal

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,

We take this opportunity to congratulate TRAI on coming up with Consultation Paper on 'Telecom network failures during Emergencies/Disasters – Priority routing of calls of persons engaged in 'response and recovery'.

In this regard, we are pleased to enclose SSTL's response to the above mentioned Consultation Paper.

We do hope that the above is in order.

Thanking you

Your faithfully
For **Sistema Shyam TeleServices Limited**

T. Narasimhan
Dy. Chief Executive Officer

Encl : As above

Response for Issues for consolation

5.1 Should there be a direction from regulator on the network dimensioning - both for operating in normal as well as emergency situations?

Operationally, network elements are dimensioned with capacity headroom of 30% to 40% of the busiest hour traffic to take care of the sudden traffic burst.

In case of emergency situations where network attempts are increased 3 to 4 times (& even as high as 7 times) as explained in the consultation paper, network needs to be dimensioned with a headroom capacity of 70% which is very impractical & requires a huge CAPEX & increase the number of elements. Also, this will not guarantee the normal operation in the emergency situations.

5.2 In your opinion, which of the three possibilities as discussed in Chapter IV i.e. (a)Solutions based on combination of MTPAS of UK and GETS of US (b) Solution based on MVNO concept (c)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?

Option-1: In CDMA network, the Priority subscriber configuration in HLR for routing such calls on priority in MSC (equivalent to eMLPP in 3GPP) would be one of the approaches which can be best suited for India. At the same this requires the similar to be followed by all operators.

Option-2: Solution based on MVNO Concept.

Option-3: Satellite communication thru Satellite phones independent of ground telecommunication (mobile SATCOM)

5.3 Is priority call routing for certain users based on Enhanced Multi-Level Precedence and pre-emption service (eMLPP) possible in intraoperator and inter-operator scenario in your network?
(a) If yes, provide the detail methodology that you will suggest for its implementation in India.
(b) If no, please indicate the time and costs required to upgrade your network and implement the same in your network.

At present, not available & to be tested.

Intra-operator for eMLPP or its equivalent is quite possible and to be tested by taking the feasibility with the technology partners. Once the Intra-operator is tested by respective operator, Inter-operator should follow after this. The time & cost would depend upon the scale solution to be implemented.

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

All organization & departments that are involved in "response and recovery' during emergency situation & contribution of all such department is interlinked. All should be part of this scheme to ensure that effective response & efficient response is ensured.

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

Since many agencies & organizations are involved in "response and recovery' during emergency situation, the scheme followed should be a central agency or department coordinating with multiple agencies during the operations.

5.6 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?

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

Implementation needs to be ensured in all networks independent of technology. (b) Cost involved in implementing such service & cost of keeping reserve capacity for emergency situations.

5.8 How should the service delivery model for implementing the priority call routing be designed?

Steps for Service Delivery Model for implementing priority call routing may be as follows:

- Working group creation
- Scope of Service
- Solutions identification best suited in Indian environment where multi-technology & multi-generation telecom equipment are in deployment.
- Solution finalization
- Cost estimation & sharing of cost by Government
- Implementation schedule

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

This may depend upon the solution finalized for implementation.