

LM/TRAI -03
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Sub.: TRAI Consultation Paper on "Universal Single Number Based Integrated Emergency Communication and Response System".

Dear Sir,

We welcome TRAI's initiative to have Consultation on "**Universal Single Number Based Integrated Emergency Communication and Response System**" with the primary aim to build a Integrated Emergency and Communication and Response System, with single emergency number which would be easy to remember and through which one can reach the desired help agency.

In this connection, please find our inputs/comments on the issues raised as under:-

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

Response:

At the outset, we would like to highlight the fact that it is important to define the meaning of Emergency first and what categories of services needs to be considered as emergency services and that needs to be brought under the same umbrella in order to built an effective system.

We believe, to start with, access to the following three key emergency services through phone should be made available -

- ☛ Police
- ☛ Doctor
- ☛ Fire Brigade

Going forward the service should be scalable to include other emergency services like Disaster Management, Natural Calamities & Women helpline etc.

Q2. What universal number (e.g. 100,108 etc) should be assigned for the Integrated Emergency Communication and Response System in India:

Response:

We believe as of now a new number (like as 911 or 112) could be assigned for the Integrated Emergency Communication and Response System in India and let the existing numbers continue for Police & Fire until successful implementation of the Integrated Emergency Communication and Response System and till the time the new universal number gains popularity.

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:

Response:

- a. NO, we believe in order to support robust and capable emergency communication ability, this ease of use should not preclude the utilization of a complex, multiple numbers, technologically advanced system. It needs to be one single number, while redundancy needs to be built into the system.
- b. In the past also, the obligation to identify correct number corresponding to the emergency help needed, has been on the consumer, which many times lead to wrong number dialing and repeated attempts to reach desired service operator. The best learning to be adopted for IECRS, would be to make consumer fully clear that he has to dial only one number irrespective of any type of emergency, without any strings or conditions attached, otherwise it may confuse the person who is facing the emergency.

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?

Response:

We believe that since this database is being built for emergency services, therefore, it should be a centralized database which should be maintained by government appointed agency as has been done in case of Mobile Number Portability.

Further we would like to mention one important aspect that needs to be taken care of is maintenance of confidentiality of the information.

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

Response:

We believe that Government should appoint the agency with expertise in managing databases and which has a prior experience in dealing with emergency situations in order to make an effective and robust system.

Further we wish to state that system should be built in such a manner that personal data / information been with centralised agency be used only by authorised persons, and also stringent laws should be made to make the system more effective and full proof.

In case, the Government decides that setting up of a centralized database should be open to any agency desirous of establishing a centralized database, then the same may be done through a public tendering process.

Also with regards to HOAX calls, the punishment should be stringent & so as to act as a deterrent for any hoax calls.

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

Response:

A: The transfer of location of a mobile user may be incorporated by suffixing the global cell id to the dialled emergency number digits. In case emergency services do not have the updated cell id to location mapping information, the location of the subscriber will not be known to the agency. Feasibility of implementation will have to be checked for challenges that may crop up during implementation.

B. The dialled emergency digits with suffix of global cell id will also have to be supported by subsequent transit exchanges.

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

Response:

The location information based on the Cell-ID positioning may be provided by the service providers. Moreover the accuracy of the location information majorly depends upon the network architecture and the positioning of the cell sites. It will also vary based on the geographical conditions and other factors.

The location information should not be dependent only on the initiator sharing but it should also be confirmed with the auto captured details provided by the Cell-ID. It will act as a onetime validation, in case of hoax call. Any new cell id configured should first be shared with the independent body, since that will be a single source of validation.

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

Response:

We believe keeping in view the International Practice and their past experiences we should not allow any emergency number access through inactive SIMs or handsets without SIMs.

To reduce crank/bogus calls, the service should be allowed from valid SIM's only. It is recommended that calls be allowed from a valid SIM with zero balance. To this effect all calls to the IECRS should be toll free for the subscriber.

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

Response:

An Emergency communication system (ECS) is any system that is organized for the primary purpose of supporting one way and two way communications of emergency messages between both individuals and groups of individuals.

We believe in as a beginning, emergency access to subscribers be allowed through only voice calls. Depending on the success we see in the voice implementation, move on to the other medium. Challenges in voice implementation should be of prime importance and tackled on priority.

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.

Response:

Keeping in mind our present network architecture, in our view point it is not technically feasible to transfer location information in real time for SMS or data based calls.

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?

Response:

We believe that the solution should not be deployed across locations in one shot. It should be built in phased manner across the boundaries of India.

It should follow a continual improvement plan. (Deploy in phases, stabilize, go to the next phase, stabilise and so on). In this way all the above challenges will get answered as the project moves along.

Also the system should be built in such a manner that data / information been be used only by authorised persons, also stringent laws should be made to make the system more refined, effective and full proof.

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

Response:

Emergency doesn't come calling, hence for genuine calls there should be priority. And in the initial stage, till a stringent punishment is not in place for hoax calls, hoax calls cannot be ruled out. Hence such hoax call too will get prioritized initially.

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

Response:

Hoax/fake calls are considered a criminal offence & ruled accordingly in other countries where such a system exists. It would be prudent to follow the same to ensure sanctity of the service.

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?

Response:

The cost should be entirely borne by the Central/State government.

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.

Response:

SLA/KPI for any project / venture is a must. However, right now in the initial stages, more than the SLA/KPI, there are other critical aspects. They should be addressed. In addition to the system responses, ground level realities also play an important role in it. Hence a pragmatic view to be taken for SLA/KPI.

We believe it's too early to comment on them right now. Currently to start with we could follow the KPIs/SLAs that are in place for the current emergency numbers like 100.

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

Response:

Assuming the PSAPs would be region centric, it would be best if the operator could speak in English, Hindi & one regional language at the time of managing calls.

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?

Response:

The transit exchanges should be capable of handling the calls to be terminated to emergency service station. For effective implementation of IECRS , there should be no IUC charged for emergency services.

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

Response:

No. For the service to be universal, it should be restricted to a single number for everyone.

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?

Response:

We believe that the effective implementation of IECRS would only be feasible when the communication system merely not only depends upon the Telecom Infrastructure but it should be built in such a way that other modes of communication may also be used under it, enabling the effectiveness of the emergency communication system even in cases limitations of telecom network.

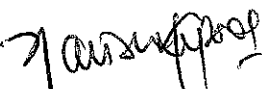
One possible limitation of using mobile phones for emergency communications, in a bomb-threat situation, for example, might include the potential of cellular networks being disabled for fear that a bomb might be detonated using a cellular phone.

Another example of a limitation could be the overloading of cellular phone networks, resulting in the delay, that may be too late. An effective emergency communication system should arguably be able to overcome as many of these potential limitations, as possible.

This is for your kind reference and consideration, please.

Thanking you,

Yours faithfully,
For **Loop Mobile (India) Limited**


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