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Date: Fri, 12 Apr 2013 16:57:26 +0530

Subject: FEEDBACK ON Consultation Paper on Universal Single Number Based Integrated Emergency Communication and Response System

FULL MEMBER OF INTERNATIONAL FEDERATION FOR EMERGENCY MEDICINE

Friday, April 12, 2013

FEEDBACK ON Consultation Paper on Universal Single Number Based Integrated Emergency Communication and Response System

From

Dr Tamorish Kole

President, Society for Emergency Medicine, India

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The Chairman

Telecom Regulatory Authority of India

Dear

Sir I am excited to see the historic milestone with regards to EMERGENCY CARE IN INDIA where you have decided to contribute immensely by working towards A SINGLE EMERGENCY NUMBER IN INDIA.

My feedback in your prescribed format is as follows

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

FEEDBACK: Medical, Police, Fire

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

FEEDBACK: 112 as this is used by many nations across the world. Alternatively 108 as there is coordination between medical, police, fire in this number.

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?

FEEDBACK: NO

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?

FEEDBACK: 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?

FEEDBACK: 3rd party

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

FEEDBACK: Delay in information on help lines in that particular state.

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

FEEDBACK: Real time accuracy at least at block level

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

FEEDBACK: Yes. This will allow someone to call for help even if the SIM fails or phone not registered with the operator.

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?

FEEDBACK: NO

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.

FEEDBACK: NO IDEA

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?

FEEDBACK: NO

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

FEEDBACK: YES. Emergency situations always take priority over other conversations.

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

FEEDBACK: Minor punishment / heavy fine.

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?

FEEDBACK: Through Center and state collaboration. An emergency cess can be levied to all cell phone users

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.

FEEDBACK: At this point of time the aim should be cover the entire country. Later time based KPIs can be mandated

- 4.16 Should use of language translation services be mandated for PSAPs? FEEDBACK: Yes
- 4.17 In your opinion, what issues related to interconnectivity and IUC may come up in implementation of IECRS in India? Whatare the suggested approaches to deal with them?

FEEDBACK: Coordination between Medical, Police, Fire. Need an Emergency Operations Directorate for the country.

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

FEEDBACK: NO, defeats the purpose. Differently abled persons should be given appropriate hardware to call Emergency number.

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.

FEEDBACK: There is a need to develop standard terminology and SOPs across MEDICAL, POLICE & FIRE.

My congratulations to you once again for taking the first step in this giant leap.

Thanks

Tamorish

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