

**Comments on Consultation paper On Universal Single Number Based
Integrated Emergency Communication and Response System**

ISSUES FOR CONSULTATION

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

It is proposed that services of POLICE, FIRE, AMBULANCE, Poison Control Service, Emergency Medical Services, Train Accident Information, Women Help Line Centre and Children in difficult Situation can be included under single emergency number.

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

Presently 100 and 108 are the most popular and easy to recall numbers for the masses, after 101 and 102. However, 108 Services may not be available in all states. It is, therefore, proposed that '100' may be assigned for the integrated emergency communication and response system in India.

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?

Indian general public is much acquainted and familiar with 101 and 102 services. It may happen that at the time of fire incident, a person, out of habit or due to unawareness about new number, may dial 101. Same may be true for 102 service. As such, it would be advisable to keep 101 and 102 functioning. The calls to these numbers can also be routed /translated to universal number assigned for the integrated emergency communication and response system. However, the foreign nationals visiting India, specially at Tourist destinations like State of Rajasthan, may not be aware about the universal number assigned in India. An alternative number considering their requirement can also be thought of.

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?

In order to extend the help effectively and to filter the hoax calls, it is necessary that the Telephone owner's credentials are displayed along with a call indication at Public Safety Answering Point (PSAP). This can be automated by extracting the information from the user database based on CLI of received call.

This, however, will require data base in a particular format, as mentioned in the consultation paper. This can be achieved if the data are maintained as centralised data, which shall be periodically updated. This will also avoid the instances of non-accessibility to data base of any particular Telecom Operator.

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?

It is advisable that a third party maintains the complete data base so dependency on a particular Telecom Operator is avoided. Other Telecom Operators may also not agree to supply their subscriber data base to another operator. It is suggested that such centralized database can be maintained by any of Govt agency like CDAC, CDOT, NIC etc. Entrusting this work to Private Agency may become cause of concern of individual user against possible information leakage.

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

In order to make the Emergency response effective and useful, it is necessary that location of Mobile User is passed on to Public Safety Answering Point (PSAP) with the most possible accuracy.

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

To start with, the location information of the mobile callers, as mandated by Department of Telecom (DoT) vide its amendment to the CMTS/UAS License conditions, dated 31st May 2011, regarding location details of their mobile subscribers can be allowed. However, the Telecom Operators shall be mandated for accuracy based on the Population Density, than the Mobile Density. To improve the efficiency of Emergency Communication and Response System, the operators shall provide accuracy of 100 mtrs in cities/towns having population of >5 lakhs.

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

This sort of arrangement will definitely give rise to hoax calls BUT a needy citizen cannot be denied Emergency Service on this ground. There may be chances that a person may need Emergency Help when hi/hers SIM is deactivated due to non recharge (as most of Mobile connections in India are pre-paid). However, it appears a rarest of occurrence when a person has Mobile without SIM and lands up in Emergency.

It is, therefore, proposed that number access be allowed from inactive SIMs as well.

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

It is possible that a person in emergency is able to send SMS/email but not able to make a call. This shall also be true for differently abled persons. As such, emergency access may also be allowed through SMS or email or data based calls. However, technical arrangements shall be made to find the location information in these cases as well.

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.

No comments on Technical issues, but the location information in these cases shall be required for extending the Emergency Services.

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?

Redundant/ hot standby systems with adequate security arrangements need to be built up to avoid such incidences.

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

The network busy condition is a common feature in case of Mobile Services. A person in an Emergency may not be in a position/condition to make repeated

attempts. As such, calls made to universal emergency number should be prioritized over normal calls in both Fixed and Mobile Systems.

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

There should be penalties for making Hoax or fake calls to emergency number to improve the efficiency and to avoid denial of service to needy person during Hoax or fake calls.

In case of Hoax or fake calls made with the intentions of disturbing Public life, the provisions available in the law of land can be operated.

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?

The calls/SMS to Emergency number should be charge free. The funding requirement for costs involved in implementation of IECRS can be met through USO Fund or any other such Fund.

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.

Response time is the most important aspect of extending Emergency Services. A delayed response can render the whole exercise useless in certain cases.

Key Performance Indicators like maximum time to respond to a call, % of calls not attended, % of calls failed due to busy tone etc are must to deliver timely services.

16 Should use of language translation services be mandated for PSAPs?

India is country of plenty of languages and dialects. India is also a popular Tourist Destination and it is necessary to extend the Emergency Services to them too. A citizen shall not be denied Emergency help due to language he/she speaks. A centralised arrangement for language translation services is desirable.

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?

Extending Emergency Services to every Citizen is the concern of Govt. Issues related to interconnectivity and IUC which may come up in implementation of IECRS need to be addressed and sorted out.

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