

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

Emergencies that seek the help of Medical, Police, Fire brigades, Disasters (Man Made or Natural), a notion of crime in progress or any other somber incident which requires immediate Emergency service presence should be made available through Single Emergency Number.

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

1-0-8 should be mandated as a Single Universal Number for all Emergency Services throughout the nation.

(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?

Yes, there should be primary and secondary access numbers for some time and should aim towards Single Primary Response number in due course of time with increasing public awareness and response networking of different Emergency Service Agencies.

1-0-8 should be made as primary Emergency Response Service number. Other prevailing numbers like 1-0-0, 1-0-1 or 1-0-2 etc can be the secondary numbers for some time and can be routed to 1-0-8 in a phased manner.

(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?

A centralized data base containing information of Telephone subscribers has to be maintained and should be invigorated regularly to get updated information and details on new addition of subscribers. This will allow the Emergency Response Service to track the callers who are availing the services effectively.

(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?

To maintain high levels of confidentiality, trust and for purposes of liability the centralized data base containing information of Telephone Subscribers should be maintained by a designated Third Party

which should provide access to the Emergency Response Service provider to track the details of the caller in real time basis.

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

The main technical issue involved is related to Location Mapping. The feature like **caller location is available** in the present 1-0-8 system but not able to take the advantage of this feature because **Telecom Service Providers are not sufficiently equipped** to carry out this particular feature. If this is achieved then the jurisdictional issues can be solved effectively and the service can respond to emergency in less time. 1-0-8 will be in a position to utilize the services like **GPS and Cell triangulation** up on receiving a call which helps in locating the emergency location in a short span of time.

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

The Department of Telecom (DoT) has specified that the accuracy on location information to be provided by the mobile service operator should be maintained at 50 mts. However in present scenario the range is varying from few meters in urban locations to few kilometers in flat country side as the mobile providers are not suitably outfitted. In order to improve service effectiveness by Emergency Response Service providers the accuracy of caller location information should progressively improve accuracy levels of mandated 50 mts.

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

The emergency number should be allowed from inactive SIMs and apart from this an in-built emergency number has to be incorporated in all the wireless communication devices (Mobile Phones) so that the caller can call even when SIM is taken out from device (GSM). More over emergency number should be incorporated by default in the SIM card by the respective service provider which will allow the person who is in distress to make emergency calls.

(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?

At present it may not be advisable to enable emergency calls from data based calls (SKYPE Calls or Paid Internet calls) as there is always a question on the authenticity of the emergency call as it can be misused which reduces the efficiency of the whole system.

(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.

Yes, it is technically possible to get the location information in case of SMS or in data based calls.

(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?

The present system Emergency Response Centre (ERC) of GVK EMRI is built by benchmarking World's best of breed technologies and Emergency Response Services around the world addressing the gap in Emergency delivery Infrastructure whether Medical, Police, Fire or any disasters. ERC is being built on a comprehensive system that is best suitable to respond to Evolving Indian needs. So the present ERC system is having efficient fool proof system and a strong firewall to tackle all those above mentioned problems. In the last seven years we haven't found any such issues in this regard.

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

Calls made to Universal Emergency Number should be prioritized over normal calls as the person is seeking emergency service attendance in less time to address his/her grievance.

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

(i) Presently GVK EMRI – 108 Service follows detailed set of procedure to tackle fake or Hoax calls which can be replicated throughout if this is mandated.

(ii) Financial fine is not a solution to deal with hoax and fake caller in present Indian context. Education and awareness should be given to people to understand the importance and necessity of Emergency call.

(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?

The Emergency Response Service should be seen as an Integrated Response Centre covering all necessary governmental bodies which embark on the Emergency Response System. The funding

requirements for Emergency Response System should be seen in entirety and not for Emergency Response Centre only in isolation.

(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.

The time taken to respond to an emergency call can be a Key performance Indicator for ERC.

(4.16) Should use of language translation services be mandated for PSAPs?

Call takers should speak a minimum of 2 languages – apart from their regional language, English should be compulsory. Knowledge of Hindi is an added advantage enabling us to coordinate with the person visiting from other states.

(4.17) 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?

As per our understanding IUC is miniscule. The respective charges should be borne by the service provider.

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

The primary goal should be to synergise among various emergency numbers and, therefore, primary and secondary emergency numbers should be mandated across the nation and should be accessible to every citizen. Next goal should be to move towards a single emergency number. Going forward in future we can definitely think about this additional feature of providing separate emergency number for differently able persons.

(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.

(a)The system should allow wireless and wired broadcast, telecom providers to voluntarily report their status of infrastructure and operation during crisis time. This information helps the Emergency Response Centre to monitor and evaluate the communication services during crisis time.

(b) The present model of Emergency Response Centre followed by GVK EMRI provided its caliber by bench marking itself best of the world Emergency Service Providers. In US, 911 system is moving from “Public Safety Answering Points (PSAP)” to “Unified Communication Centers (UCC)”. GVK EMRI

has called its Centers as “Emergency Response Centre (ERC)” and therefore, has come to be known so in India. Therefore, instead of bearing the name of PSAP or UCC, the centre should be called ERC.