

Directorate of Coordination  
Police Wireless

R 686/13 JS  
27/5

Subject: TRAI's Consultation Paper on "Universal Number based Integrated Emergency Communication and Response System (IECRS)"

MHA may kindly refer to ID No. 25019/17/2013-PM-II dated 16.05.13 The consultation paper has been examined by this Directorate and parawise comments are as under:

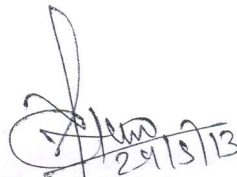
- Chapter I Emergency Communication and response system in India – current status and way forward*  
Comments No comments
- Chapter II International Practice*  
Comments No comments.
- Chapter III and IV Implementation of integrated emergency communication and response system in India and issues involved.*  
*Summary of issues for consultation*  
Issues has been discussed in Chapter III and the issues have been summarized in Questionnaire form. The comments are as under
- Q1. What are the types of emergency services that should be made available through single emergency number?*  
Comments Should include predefined Emergency services such as Police, Medical ,fire etc and for any type of emergencies for which operator should be well prepared to respond.
- Q2. What Universal number (e.g. 100, 108 etc) should be assigned for the integrated emergency communication and response system in India?*  
Comments ITU recommendations as mentioned in Consultation paper may be followed
- Q3. Should there be primary/secondary access numbers defined for the integrated emergency communication and response system in India?*  
Comments Single number is desired , multiple number may create confusion and passing the buck type situation.
- 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?*  
Comments Geographical location of the caller shall be required for providing the relief. Other information may load the system and may create delay in providing relief. It may also comprise with private data of citizen. As such these database may be maintained by agencies.
- Q5. In case of centralized database which agency (one of the designated telecom service provider, a Central Government department and a*

*[Signature]*

- designated third party) should be responsible for maintaining the database?*
- Comments Geographical location of the caller shall be required for providing the relief. Other information may load the system and may create delay in providing relief. It may also comprise with private data of citizen. As such these database may be maintained by agencies.
- Q6 *What are the technical issues involved in transfer of location of a mobile user in real time?*
- Comments No Comments
- Q7 *What accuracy should be mandated for the location information to be provided by the mobile service provider?*
- Comments DOT has already framed the guidelines and same may be adhered.
- Q8 *Should emergency number access be allowed from inactive SIMs or handsets without SIMs? Please justify your answer.*
- Comments Emergency services from inactive SIM may be allowed but not from the handsets without SIM
- Q9 *Should emergency access be allowed through SMS or email or data based calls? If yes, what will be the challenges in its implementation?*
- Comments Yes and may be implemented in phases.
- 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 challenge if any.*
- Comments No Comments.
- Q11 *How to build redundancy in operations of Centralized response centres 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?*
- Comments Geographically hot standby database and hot standby call centre may be created. In case of any exigencies the hot standby data base and call centre should be capable of taking the load of other units.
- Q12 *Should all the calls made to universal emergency number be prioritized over normal calls? Please justify your answer?*
- Comments Yes, Since it is emergency and relief is to be provided immediately.
- Q13 *What legal/ penal provisions should be made to deal with the problem of Hoax or fake calls to emergency numbers?*
- Comments Legal Issues - No Comments
- 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?*
- Comments Financial Issues - No Comments .
- 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*
- Comments Call should be answered in less than 3 seconds, Despatcher should be able to send the relief in 10 seconds.



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- Q16 *Should use of language translation services be mandated for PSAPs?*  
Comments Yes
- 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?*  
Comments Since this obligatory services it should be mandatory for service providers for providing the interconnectivity for these type of services.
- Q18 *Should a separate emergency number for differently able persons be mandated in India? How the use of this number be administrated?*  
Comments Multiplicity of emergency number is not desired. Single number is recommended.
- 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? Please elaborate.*  
Comments International Telecommunication Union Standard recommendations for emergency communication may be followed to have a harmonization. There should be only single dispatcher who shall provide relevant emergency relief services to the caller.

  
(Rajesh Ekka)

Deputy Director (Standardisation)

Under Secretary, PM II, MHA, New Delhi  
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