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COMMISSIONERATE
Health & Family Welfare and Ayush Services

No: DD/EMRI/03/2013-14

Date: 24-04-2013

To:

The Telecom Regulatory Authority of India (TRAI),

Sub: Feedback on consultation paper on "Universal Single Number Based Integrated Emergency Communication and Response System (IECRS)"

Ref: Email dated: 08-04-2013

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Sir,

We are here with furnishing our response on the Universal Single Number Based Integrated Emergency Communication and Response System (IECRS) as follows:

- 1) What are the types of emergency services that should be made available through single emergency number?
Police, Fire, Medical emergencies, Epidemic and Disaster alert to be taken up by single no.
- 2) What universal number (e.g.100,108 etc) should be assigned for the integrated emergency communication and response system in India?
108 is more popular to emergency services, common man aware of this number, which may be considered.
- 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?
108 may be primary, 102 may be secondary.
- 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?
Centralized data base.



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- 5) In cases 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?

Central Government Department.

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

Location, land mark and nearby historical location.

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

Background image of the caller.

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

So by using emergency number access to inactive SIMs and handsets without SIMs facilitate faster tracking.

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

Yes, in case of failed call alert for not reachable areas. Also this can be done in addition to call for tracking of geographical location of the caller.

It is more useful if the message is sent through calling with same content.

- 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?

Not sure.

- 11) How to build redundancy in operations of Centralized response canters or PSPAs 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?

Support software is needed with ultra-modern protection method.



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

Yes. Call triaging according to severity of the emergency is also mandatory.

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

Minimum penalty and block-listing of caller number at least for short time.

14) How should the funding requirement be met for cost 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?

As it is recommended to centrally monitored system, Central Government should need to incur all expenses for better implementation of the project.

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?

Yes.

- a) Response Time.
- b) Time of reach.
- c) Time of treatment started.
- d) Disability limited.
- e) Life saved.

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

Yes, according to linguistic state norm or to the choice of the caller.

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?

Terrain issues like hilly, dessert and forest areas.



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

Not necessary. Same numbers may be used with simultaneous message alert.

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?

So as country is a geographically wider and with diversity of languages and natural variations, all possible means to access IECRS may thought of.

Yours faithfully,

Upatu

Commissioner,

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Copy for kind information:

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