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Counter Comments
TRAI PR20211103¹& CP 20211103²

Introduction:

The consultation paper released by TRAI on Tariff is about issues related to SMS and Cell Broadcast alerts disseminated through Common Alerting Protocol (CAP) platform during disasters/non-disasters.

1.1: Obviously inter-alia the following words are covered while soliciting the comments/counter comments of stake:

(a) SMS alerts

(b) Cell Broadcast alerts

(c) Common Alerting Protocol (CAP)

(i) The stated mission of CDOT CAP is:

∞ Modernize and integrate existing alert and warning systems at the national, state, territorial, local levels in a single, cohesive platform

∞ Implementation of Common Alerting Protocol (CAP) for **crisis** information interchange between organizations.

∞ Forecasting agencies can address public or the First Responders of a specific area simultaneously cover all media coverage (SMS, IVR call, TV, Radio, Siren, Road Signage, Railway station announcement system, social media etc.) in 23 vernacular languages.

∞ Facilitate rescue and recovery operation post **disaster** through GIS based resource planning and unified platform for disaster response force.

(d) Disasters

(e) Non-disasters

(f) Tariff

(g) THE TELECOM COMMERCIAL COMMUNICATIONS CUSTOMER PREFERENCE REGULATIONS, 2018 (6 of 2018)

2. "For the delivery of public warning, there appears to be no single solution that fits all the requirements for the timely notification of an emergency incident or situation. Therefore, a Public Warning System (PWS) ought to be a blend of the best attributes of the existing technologies, adapted to the particular demands of the country or territory in question" (Page 5³).

3. SMS and Cell Broadcast alerts for public warning and each has its advantages and drawbacks.

4.1(a), 1(b) need to cover, **obviously**, three phases of a life cycle of a disaster/crisis viz pre, during & post disaster.

5. As per 2.8 of CP detailed guidelines to grant exemption on SMS charges with respect to TCCCPR, 2018 are provided in Annexure II of CP.

Issues for Consultation

Question 1: What are the technical options available with the Telecom Service Providers for mass message dissemination through Common Alerting Protocol (CAP) platform during disasters and non-disasters and what are the challenges being faced with respect to these technology options?

Question 2: Which method of mass message dissemination for alert, Short Service Message or Cell Broadcast Service, is preferred? Please provide supporting reasons.

Question 3: What is the success rate in delivery of messages in each of the methods adopted by the operators for dissemination of messages to the masses? Please provide details.

Question 4: What are the challenges related to customer end devices that may arise due to Cell Broadcast Service? If so, what are they and what is the extent (total number as well as percentage) of such cases encountered so far? In case an operator has first-hand experience, then the same may be shared with facts.

Question 5: Is there a need for an elaborate tariff fixation exercise for CAP messages? In the alternative, would it be better from the perspective of ease of regulation to keep all categories of alerts/ messages given in paragraph 2.6 above including those at categories (i),(ii) and (iv) there offree of charge? Is keeping all CAP alerts/ messages free of charge an economically prudent and viable option?

Question 6: If answer to the question number 5 is No, then whether the service SMS charges of up to Rs 0.05 (up to five paise) as mentioned at Regulation 35 of TCCCPR 2018 be adopted for SMS/Cell Broadcast alerts/ messages sent through CAP platform?

Question 7: What tariffs should be charged by TSPs for SMS and Cell Broadcast alerts/ messages under category (i), (ii) & (iv) as given at paragraph 2.6 above, in case SMS charges of up to Rs 0.05 (up to five paise) as mentioned at Regulation 35 of TCCCPR 2018 is not to be adopted?

Question 8: What are the operational challenges for disseminating mass messages through Short Service Message and Cell Broadcast Service? What is the impact of these operational challenges on the costs involved in such dissemination? Please justify.

Question 9: What methodology should be adopted to do the costing of the Cell Broadcast alerts/ messages? What are the cost items which should be factored in? Please provide supporting reasons.

Ans. Question 1 to Question 9: Kindly refer to **Ans. Question 10.**

Question 10: If there are any other issues/suggestions relevant to the subject, stakeholders are invited to submit the same with proper justification.

Ans. Question 10:

1.Both 1(a) & 1(b) options of para 1 of Introduction should be fully utilised for the stated purposes to their full potential.

2.In view of what is stated in paras 1(c) & 1(g) above there is no need for:

(a)There is no need for fresh Tariff exercise and may be levied as 1(g)

(b)Exemptions may be handled as per procedure given in Annexure II of CP

(c) Both **disaster**, **crisis** words appear in stated mission of CDOT CAP accordingly charges may be evaluated similarly for both situations. Difference if any may be incorporated in exemptions.

3. 1(a),1(b) means for PWS are based on TELEPHONY. However there are as many as '5' options are available⁴. Systems for landline⁵ phones are also mentioned there. It is suggested that use of LANDLINES may also be considered like many other countries as mentioned⁶.

References

1. https://www.trai.gov.in/sites/default/files/PR_No.48of2021.pdf

2. https://www.trai.gov.in/sites/default/files/CP_03112021.pdf

3. <https://eena.org/knowledge-hub/documents/public-warning-systems-2019-update/>

4. para'8' *ibid.*

5. pra'8.5' *ibid.*

6. *ibid.*