COMMENTS ON CONSULTATION ISSUES BY NDMA

Issues of Consultation

Q1: What are the types of emergency services that should be made available through single emergency number?

Answer:

The overall scope of emergencies which are to be addressed will need to be addressed carefully and revised /reviewed from time to time. From domestic / neighbourhood quarrels to serious law and order problems, fires, building collapse, seriously ill people in need of emergency aid, killings, chemical leaks/explosions, accidents whether traffic, industrial or household, molestation, rape, murders, robberies and hoax calls are some of the few incidents which would need to be addressed. The scope is large, distress of the caller may or may not be genuine. What is of importance here is how the call will be directed to the concerned response department. Getting the right contact numbers and explaining the same situation to each of them results in delay in a situation where one would want instant response.

Citizens should be allowed to call the prescribed single number for any 'emergency situation' which can be life threatening and demand 'immediate external assistance'. 'Emergency situation' and 'external assistance' can be appropriately defined. Police, fire services, medical, traffic, disaster management, Coast Guard are some of the services who will be the responders.

Q2: **What universal number (e.g. 100,108 etc) should be assigned for the Integrated Emergency Communication and Response System in India?**

Answer:

Ideally 100 should be used as Primary Access Number since it is one of the earliest numbers in use in the country, however, its scope has to be changed from mere law and order to cover the entire range of emergency services as prescribed.

It does not matter which number is kept as Universal Number as long as a strong strategy for generating awareness and education is put into place. It is more important for the process flow to be streamlined, effective, efficient, sympathetic and people friendly i.e. how the call is handled and how effective is the response.

Q3: **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?**

Answer:

Yes, both primary and secondary access numbers should be prescribed. The secondary access number should be one which is globally harmonized and has international acceptance e.g. 911, since it will help tourists. However, calls to both these numbers and any other numbers prevalent today as help line numbers should reach the same IECRS call centre for at least 2-3 years after implementation of this Emergency Response Service.

Issues involved in transfer of Caller identification and maintaining subscriber database

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?**

Answer:

Updating and accuracy of database is more important than the location of database. The critical issue here is real time identification and location of caller and making this data available to the responder for an efficient and prompt response. The data can stay with service providers as long as they are mandated to push required identification details along with the call to unified service number.

Centralized architecture may demand (IT infrastructure and resources and Data updating requirement). Service provider option looks more appropriate for Indian conditions.

Q5: **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.**

Answer:

In case this approach is adopted – a central government department should be made responsible for maintenance of the database. NIC under MoC&IT may be one option across the country. A centralized database required to be updated by service providers would however answer questions related to security, since it will be run by government agencies and it will part with information only to those authorized to receive it.

Location information in case of mobile users

Q6: **What are the technical issues involved in transfer of location of a mobile user in real time?**

Answer:

Available technology should enable accurate location of a mobile user.

Q7: **What accuracy should be mandated for the location information to be provided by the mobile service provider?**

Answer:

The best practices being followed the world over should be prescribed to service providers.

Q8: Should emergency number access be allowed from inactive SIMs or handsets without SIMs? Please justify your answer.

Answer:

Emergency number access should be allowed from pay phones, temporarily suspended accounts or inactive SIMs or handsets. In a given situation - a prepaid subscriber may have few seconds of talk time left and he / she may not be in a position to complete conversation with the call center agent, which last for few minutes !

Callers using **inactive SIM** should be educated – to redial if the call drops in between the conversation as the call center agent may not have his/her number / ID displayed (Inactive SIM). However, misuse/hoax calls are possible. It is better to provide such facility and save one distressed person rather than do away with it due to some mischief makers. Obviously penalties should be prescribed for misuse.

Q9:   Should emergency access be allowed through SMS or email or data based calls? If yes, what will be the challenges in its implementation?

Answer:

Yes. SMS/email should be allowed. This facility will assist differently abled persons. Phones can also be provided with "panic button" to address situations involving kidnapping or rape etc.

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 challenges if any.

Answer:

Resilience and security of Emergency response services

Q11: 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?

Answer:

"Connectivity" is the key for any call center service. Stringent SLA with service providers must govern service uptime for PSAPS. Internal cyber security policy should regulate safe operation of IT infrastructure.

Q12: Should all the calls made to universal emergency number be prioritized over normal calls? Please justify your answer.

Answer:

Emergency calls need to be provided some degree of priority over routine phone traffic. However, another important aspect which also needs to be looked at seriously is 'Priority Calling' especially in case of emergency situations such as terrorist attack, bombings or natural /manmade disasters of large magnitude in which case only limited subscribers i.e. the responders and the administration need priority calling facility to avoid choking of networks.

Q13: What legal/penal provisions should be made to deal with the problem of Hoax or fake calls to emergency numbers?

Answer:

A heavy penalty for a hoax calls with a very simple procedure for collection should be put into place. In addition, lack of response / poor response / delayed response by the respondent agencies should also be penalized and defaulting officials severely dealt with, if found guilty.

Funding of IECRS

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?

Answer:

Sources of funding such services could be from Universal Service Obligation Fund or a cess charged on each user. The Centre should encourage and support efforts by States to deploy comprehensive end to end emergency communications infrastructure and programmes, based on coordinated statewise plans.

Other technical and social obligation related issues

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.

Answer:

The best practices being followed the world over should be prescribed. The critical factor in this is not response by the IECRS call centre but that of the response agency which actually matters to the victim.

Q16: Should use of language translation services be mandated for PSAPs?

Answer:

In a large country like ours with numerous languages / dialects this would be essential.

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?

Answer:

This is a regulatory issue and should be addressed under the provisions of Indian Telegraph Act.

Q18: Should a separate emergency number for differently able persons be mandated in India? How the use of this number be administered?

Answer:

No separate number for differently abled persons is required. Of importance to differently abled persons is the ease of access to IECRS facilities whether through voice mail, text messaging or even simple panic button and similar applications available on communication devices. Such panic buttons/ applications can be used by disabled as well as by others during situations involving kidnapping or rape etc**.**

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.

Answer:

The important issue is to get all the stake holders of different segments together and discuss their views. Coordination with response agencies, training of their personnel and overcoming territorial/ jurisdictional issues will be critical to the success of the public and increase their confidence in the Government and its agencies.

Thus, the important IECRS components would be

(a)   Use of technology to make available an uptodate, viable but simple IECRS system for the public

(b)   The operational aspects touching on processes followed by call centres, activities of the response forces, the feedback system and overall improvement over a period of time.

(c)   Training of staff whether at the call centre or those of responders.

(d)   Education of the public about the facilities available, penalty in case of misuse.

(e)   Strict enforcement of legislation and penalties for delays, hoax calls etc.