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May 10, 2023

Shri Sanjay Kumar Agrawal
Dy. Director General (Disaster Management)
Department of Telecommunications

Subject:- Regarding Notification No. F.No. 15-2/2021-DM regarding Cell Broadcasting & Request for a Joint DOT-CDOT-Industry Virtual Session

Respected Sir,

Greetings from MAIT, the apex industry association for ICT in India!

This is further to our earlier mail dated April 13, 2023 (copy enclosed for ready reference), w.r.t. **DOT Notification No. F.No. 15-2/2021-DM dated April 6, 2023**, regarding Cell broadcast in new smartphones and feature phones.

We convey our thanks to you for taking notice of industry's concerns and calling for a meeting (which was scheduled for May 4, 2023, but was postponed). We understand that the meeting shall be rescheduled shortly, and industry is eagerly looking for the meeting to have clarity on the above-referred notification. On behalf of the industry, **MAIT requests you to also call representatives from Google/Android for this Consultative Meeting as none of the requirements are hardware-based and has dependencies on Google/Android for majority of the mobile brands.**

We have also been informed by the industry that since Google/ Android has not been involved in any of the discussions, they are not aware of the obligations w.r.t. the notification. **It is paramount to define detailed parameters which is absolutely critical for the successful implementation of the Cell Broadcasting feature which has to be clarified to industry.**

In addition to the earlier request for clarity, please find below the additional points for clarification for your feedback and kind consideration:-

1. Deferment of Auto readout feature:

Auto read out feature for all the 22 Indian languages will involve considerable high effort that would span many years of development effort for synthesised voice generation out of text. It would also be challenging to get the language speaking experts for all 22 languages. Hence, we would request to limit this to feature only to the primary and secondary languages. We would also request if there can be a pre canned audio that would be more meaning full for this feature to work.

Further it is requested that the implementation of this Auto readout implementation be deferred till a clear approach is defined.

2. ETWS support:

- 1) ETWS has critical low latency requirements and has high impact on battery life of the device. Both CMAS and ETWS are mutually exclusive and serves the same purpose, we would request to consider the implementation of one of the

two standards. Typically, most countries (US, Europe, Middle East) use CMAS Alerts only whereas Japan uses ETWS.

- 2) Is the ETWS infrastructure for delivering the warnings with low latency deployed in India. Have carriers' systems integrated with the capability to support ETWS alert delivery mechanisms. If yes, can we test it? - If not, we would request to enable this requirement at a later phase when the infrastructure is ready.

3. **Number of alert types are too many:**

The number of configurable switches is too many for a user to configure and this is cause of confusion to the user. Many times user will tend to disable the feature at once and we permanently lose them from having the feature enabled. Our suggestion is to limit the number of Alert types. Alert type can be grouped together for example the Extreme alert type and Severe alert type, etc. and have them under a single emergency alert type. For example:

- 1) National Alerts (4370, 4383)
- 2) Emergency Alerts (4371, 4372, 4385, 4386, 4373 - 4378, 4386 - 4391)
- 3) Child Abduction Alerts (4379, 4392)
- 4) Test Alerts (4355, 4393, 4380)

4. **Operator alerts:**

Please define the usage of this alert type. This has never been enabled anywhere in the world. Misuse of the facility should not be allowed under any circumstances and the purpose of operator alerts should only be Disaster alerts.

5. **Primary and secondary language support:**

Please provide clarity around the primary and secondary language support. Since we have 22 languages to be supported, what is the definition for primary and secondary languages. If this differentiation of primary and secondary is not specified, then the UE will alert the user in all the languages that would be broadcasted that would bring duplicate/repetition in multiple languages.

6. **Local language support:**

How would the CBS messages get broadcasted in local languages. If there is primary and secondary language defined how would the local language handled.

7. **Testing:**

Without end-to-end testing with the Cell Broadcast Centre (CBC) and telecom service providers, it would be challenging to enable any of the all the alert types. We would urge DoT to facilitate the end-to-end testing with the telecom service providers of all the alert types. If no end-to-end testing is done, then the guarantee for the feature to work on ground is not ensured and in times of disaster the end user will be in a difficult situation.

We would further request for at least 6 months of IOT time with telecom service providers before rollout.

8. Does the network support cell broadcast with all networks 2G/3G/4G/5G?

9. **Others:**

Cell broadcast service is referred in many countries as Wireless emergency alerts (WEA). We suggest that we can use the same terminology in India as well in feature list and user manuals.

While the Wireless emergency alert feature is default on, globally the user has the option to keep the feature on/off, as the user may be in a situation where any form of notification (audio/vibration/visual) could be a distraction.

These implementation aspects need to be addressed prior to the rollout to ensure a smooth rollout of the CB feature. **May we request for clarifications on the points raised in our earlier representation dated 13th April 2023, as also this representation.**

Look forward to the new date for Consultative Meeting and favourable consideration of our inputs.

Warm regards,



Col. AA Jafri, Retd.
Director General