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Ref.No.MAIT/PY/2276

July 17, 2023

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

Subject: Minutes of Meeting; F.NO. 15-2/2021-DM dated July 06 2023; Gazette Publication of Indian Wireless Telegraphy (Cell Broadcasting Service for Disaster Alerts) Rules, 2023- G.S.R. 278(E).-Clarifications sought by Mobile handset manufacturers

Respected Sir,

Greetings from MAIT!

We would like to thank you for arranging the meeting on 6th July to discuss the issues raised by the industry on the implementation of Cell Broadcasting in mobile handsets.

On the issue of Auto read-out of Cell Broadcast (“CB”) messages, we draw your attention once again to the several industry representations on the subject both prior to the issue of the gazette notification on April 06 2023 and subsequent to it. We note with concern that the industry views and submissions verbally in the meetings as well as in written form have not been addressed so far.

Kindly refer to our previous written submissions (**attached**):

1. MAIT Representation No.MAIT/PY/2252 dated 05 June 2023
2. MAIT Representation No.MAIT/PY/2732 dated 10 May 2023
3. MAIT Representation No.MAIT/PY/2728 dated 08 May 2023
4. MAIT Representation No.MAIT/PY/2685 dated 13 April 2023

Please find the difficulties in implementing the Auto read-out feature asked in the 22 languages:

1. The development of a “Text to speech” voice synthesizer which is capable of reading out the CBS/CMAS messages in all 22 Indian vernacular languages is a highly technically sensitive feature and will take a few years for implementation. Also implementing all the 22 languages text to auto-read out of messages is techno-commercially not feasible.
2. The development of such a feature will be cost-intensive and will end up increasing the cost of the final product (Phone).
3. It would also require language experts in all 22 languages to train the “Text to speech” software modules.
4. The use of pre-built audio libraries for disaster alerts is inefficient due to the following reasons:

- Pre-built audio library for CB messages would limit the options and flexibilities to create alert messages considering the disaster situation could be very dynamic in nature.
- There are 23 languages including English language and all the audio message libraries have to be replicated. Hence, the mapping and handling of the audio library becomes complicated.
- Most countries in the world have a practice of primary and secondary language recognised nationally for CBS messages delivery happens in only those languages.

The Auto-readout feature is a separate and gigantic project in itself and cannot be clubbed with the CB functionality as defined in the 3GPP standards. Nowhere in the world is there a precedent for Auto-read feature in so many languages. Also, we would like to mention that text-based CB support for English and all 22 Indian local languages will be supported.

The industry is with the Government in providing the much-needed CB feature to consumers. This feature will augment disaster management efforts. However, considering the above-mentioned facts, **we would once again request that the auto readout feature be allowed to be implemented in mobile phones in two languages only i.e. English & Hindi and amend the gazette notification by deleting Clause No 3 (3) of the G.S.R. 278(E).**

Warm regards,

Col Suhail Zaidi (Retd)
Director General

CC: Shri K. Rajaraman, IAS, Chairman DCC & Secretary (T), DoT
CC: Shri Alkesh Kumar Sharma, IAS, Secretary, MeitY
CC: Shri V. L. Kantha Rao, IAS, Addl. Secretary, DoT
CC: Shri Bhuvnesh Kumar, IAS, Addl. Secretary, MeitY
CC: Dr. Rajkumar Upadhyay, ITS, Executive Director, C-DoT
CC: Smt. Gunjan Dave, Member (T), DCC, DoT
CC: Shri Kamal Kishore, Member Secretary, NDMA
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