

RESPONSE TO
ADOPTION OF ALTERNATIVE EMERGENCY NUMBERS
(TOWARDS GLOBALLY HARMONISED EMERGENCY NUMBERS)

LIME

Landline | Internet | Mobile | Entertainment

By e-mail to: crobinson@our.org.jm
January 19, 2011

I Introduction

1. Cable and Wireless (Jamaica) Limited, trading as LIME (“LIME”) is pleased to provide the following response to the Office of Utilities Regulation (OUR) consultation document titled ‘*Adoption of Alternative Emergency Numbers*’ (the consultation document), dated December 2010.

2. LIME expressly states that failure to address any issue raised in the consultation document does not necessarily signify its agreement in whole or in part with any position taken on the matter by the OUR. LIME reserves the right to comment on any issue raised in the consultation document at a later date.

II The OUR’s Proposal to the ITU

3. ¹*The Office requested the ITU to consider its following proposal for the establishment of a global emergency number:*

“The ITU should recommend the adoption of the 3-digit non-geographic number 112 as the Global Emergency Number to be dialled anywhere in the world to reach the local fire, police, medical/ambulance and coastguard emergency services.

This is, perhaps, the most feasible and pragmatic solution given: the telecommunications industry’s de facto recognition of 112 as “the international emergency number”; the incorporation of “112” in mobile telephony standards for emergency calling; the actual implementation of “112” in major countries of the world as the standard or alternative emergency number.

¹ Consultative Document titled ‘Adoption of Alternative Emergency Numbers (Towards Globally Harmonized Emergency Numbers)’, paragraph 4, December 2010

Countries that are concerned about possible changes to their numbering plans may consider the possibility of benefits accruing. Such changes were required of many European countries with the adoption of 112 as the pan-European emergency number. However, they benefited because a substantial set of new 11X to 11XXX numbers became available for present and future services.”

“... Conclusion”

“The world’s population is expanding and the need and desire for international travel will continue to increase”... A global emergency number will save people’s lives... and enhance their feeling of security and well-being when they travel [abroad]...”

4. LIME agrees with the OUR that harmonization of emergency numbers is supportive of globalization. Tourism will be benefitted. It also addresses the long standing issue that local service providers have had to grapple with which is the routing of emergency calls, made by travellers roaming in Jamaica, to access codes such as 112, which are not formally recognized as emergency codes in the domestic Jamaican market.

5. The benefit to be derived is twofold - travellers to Jamaica can dial a standard, universal code for emergency services and Jamaicans travelling abroad will also have the benefit of calling that standard, universal emergency number having become familiar with the access code from home.

III. LIME’s Response to the OUR’s Questions

Question 1: Do you agree with the foregoing analysis of the ITU-T E.161.1 implementation options and the proposed choice of option 3?

6. At paragraph 7.15 *‘The Office proposes an implementation approach that will*

optimise: the attainment of the global harmonisation objective, caller confusion avoidance, the conservation of scarce numbering resources, and conformance with the National Numbering and Dialling Plans’. As such, the OUR’s preferred option is option 3 which proposes:

OPTION	CALLING TO		COMMENTS
	Emergency Operator {For Fire, Police} { or Ambulance }	Police (Direct)	
3	112; 911	119	<ul style="list-style-type: none"> - Start with option 2 and withdraw 110 after 1 year. - Use of 112 & 119 consistent with other countries’. - Potential confusion of 119 and 911.

7. LIME has no objections to the OUR’s preferred option within the context of the OUR’s objectives to harmonise emergency numbers while at the same time minimizing disruption.

Question 2: Do you agree that there is no compelling reason to apply the specified provision of the 3GPP specification TS 22.101 in PLMNs in Jamaica? If no, please justify your response.

8. LIME agrees, in the context of the OUR’s objective, that the OUR is not compelled to adopt the 3GPP standard. Paragraph 7.21 raises the interesting issue of a person being able to reach the local emergency service from a mobile phone which does not have SIM card – that is the person is not a customer of any service provider and the mobile phone is not registered on any network. While service providers do not have a legal obligation to provide emergency services to persons who are not customers, LIME does convey emergency calls, that are picked up by its network, from SIM-less mobile phones.

Question 3: Do you think a permissive dialling period of one year is adequate?

9. The providers of the actual emergency services are best placed to provide guidance on the adequacy of any permissive dialing period.

Question 4: What are your views on a requisite consumer awareness campaign, including stakeholder roles?

10. The providers of the actual emergency services are best placed to determine the components of an effective consumer awareness campaign.

IV. Closing Remarks

11. Kindly send any communication in relation to this consultation to:

Mr. Charles Douglas

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END DOCUMENT