

# PUBLIC CONSULTATION COMMENT SUBMISSION FORM

Document Name: NATIONAL EMERGENCY COMMUNICATIONS PLAN

In the information submitted below, please indicate what information should be considered as confidential by the ODPM/TEMA/TATT.

**1. Respondent Category:**

- (a) Regional regulatory or governmental agencies
- (b) Existing service and/ or facility providers and affiliates
- (c) Potential service and/ or facility providers and affiliates
- (d) Service provider associations/ clubs/ groups
- (e) Consumers/ consumer groups
- (f) General public

**2. Interest**

(Provide details of any relationship with/ interest in any of the above respondent categories):

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**3. Contact Information:**

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Email Address: [info@tcs.tt](mailto:info@tcs.tt)

Contact Number: 1-868-684-1796.....

**The information and comments stated above can be published by the ODPM/TEMA/TATT for the purposes of consultation except those which are considered confidential.**

Agree

Do not agree

Signature: .....

Position of signatory: .....  
(This is only applicable for stakeholder categories *a* to *e*)

**All comments should be submitted to either one of the following:**

**1. TATT via e-mail to [consultation@tatt.org.tt](mailto:consultation@tatt.org.tt) (in MS Word format) and by regular mail or by hand to the Authority's office at #5 Eighth Avenue Extension, Barataria, Trinidad.**

- 2. ODPM**
- 3. TEMA**

The following summarizes the comments and recommendations received from stakeholders on the first draft of this document and the decisions made by ODPM/TEMA/TATT to be incorporated in the revised document.

| Item | Section | DOCUMENT Section | Stakeholder | Comments   | Recommendations  | ODPM/TEMA/TATT's Decision |
|------|---------|------------------|-------------|--|--|---------------------------|
| 1    | 1       | 1.2 Purpose      | TTCS        | The TTCS notes that the plan primarily addresses internal/private communications within the ODPM and between the ODPM and First responders. Communication with the public seems to be quite limited, in our opinion.   | The recommendations below are focused on the main issues that the TTCS believes are necessary and critical to protecting life in case of a National Emergency.   |                           |
| 2    | 1       | 1.4 Objectives   | TTCS        | The current digital society in which we live, with social media and the almost limitless capabilities of crowd sourcing technology, offers great opportunities to the ODPM with regard to planning and implementation of the National Emergency Communications Plan. Noting that in case of an emergency, Internet services will likely be unavailable, we believe that localised communication platforms will be necessary. Resiliency of the methods used will be extremely important. For example, SMS, better known as Text Messages, are the most resilient that depend on infrastructure because of the FIFO (First In, First Out) method which allows messages to | Increase the scope of the emergency communications infrastructure beyond land mobile radio systems and broadband, Communications methods should be chosen based on resiliency, such as: Outside of infrastructure, communications considered should be HAM radio and CB. |                           |

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|      |         |                     |             | <p>eventually get through... with the ancillary benefit of using less battery on the ground, allowing a phone in the hands of someone needing assistance to offer more usage.</p> | <p>As well as Broadcast: Radio, tv.<br/>Based on the communications infrastructure – SMS /text messaging.</p> <p>Bias should be for the more resilient - text messages/SMS , HAM, CB.</p> <p>Establishment of IXPs and localised (cached) communication platforms for popular communication systems such as Facebook, WhatsApp, Viber, etc as well as underlying infrastructure such as DNS and BGP Routing.</p> <p>The TTCS stands available to the ODPM to discuss the power of crowd sourcing and using social media to gather information and respond accordingly</p> |                              |

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|      | 4       | 4 Public Notifications and Warning | TTCS        | The list of public notifications and warnings is too limited.<br>Currently members of the TTCS get information from the ODPM from their website and this is forwarded through Whatsapp from not so trusty sources  | The ODPM can disperse information using the various social media and technologies exist today in Trinidad and Tobago: SMS, Twitter, Instagram, Facebook, ODPM App, Email, TV, Cable, Radio, Whatsapp, Viber. |                           |
|      | 4       | 4 Public Notifications and Warning | TTCS        | The type of information that is needed during a disaster was not specified and should be clearly stated based on data and best practices..<br>Some information might be:<br>Location of shelters<br>Locations to stay away from<br>Traffic warnings and alerts<br>Road blockages and alternate routes<br>Dispatching of emergency supplies | The ODPM should create a standard schedule of types of data that are needed during particular kinds of disasters and have this as part of their plan.  |                           |
|      | 4       | 4 Public Notifications and Warning | TTCS        | Only Columbus Communications has an agreement with the ODPM  | The agreement with Columbus Communications should be extended to all other providers.  |                           |

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|      | 5       | 5<br>Public Information Exchange    | TTCS        | Some persons may need help but do not have credit on their phone for calls, data (texting) for communicating with authorities, downloading videos for how tos to quickly fix things such as plumbing, electrical. | All Internet Service Providers should open all calling, sms and data plan services and have them for free during the state of emergency. Establishment of IXPs and localised (cached) communication platforms for popular communication systems such as facebook, whatsapp, youtube, viber, etc as well as underlying infrastructure such as DNS, BGP Routing should be implemented should the Internet be disconnected from the rest of the world |                           |
|      | 6       | 6<br>Reporting of Local Emergencies | TTCS        | The list of methods for the public to report local emergencies is extremely limited. It only has telephone contacts and doesn't include modern and cheap or free technologies.                                    | The ODPM should consider:<br>The use of drones,<br>An ODPM app for reporting and receiving information,<br>Website submission from the ODPM's website<br>Social media posts for assessing the disaster.<br>Emails, SMS, messaging  |                           |

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|      |         |                                     |             |  | <p>tools<br/>Third party groups/organizations. The TTCS would also like to propose a system called CSA - Credible Source Assessment (CSA) - a system of determining the credibility, accuracy and reliability of a source.</p>  |                              |
|      | 6       | 6<br>Reporting of Local Emergencies | TTCS        | <p>The TTCS considers that the document does not address the confirmation of reports of local emergencies. Before activation of emergency response for a local emergency, efforts should be made to quickly determine whether the report is true or not.</p> | <p>The TTCS would like to recommend that the ODPM institute an Evaluation/Confirmation of Emergency reporting process</p> <ul style="list-style-type: none"> <li>• ODPM Official - eyewitness</li> <li>• Camera Network System</li> <li>• Helicopter Surveillance</li> <li>• Drone surveillance</li> <li>• Police Report surveillance - Regular patrolling</li> <li>• Fire Report surveillance - Regular patrolling</li> <li>• Coast Guard</li> </ul> |                              |

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|      |         |                                  |             |   | Surveillance <ul style="list-style-type: none"> <li>• Life Guard Surveillance</li> <li>• Persons with a high Credible Source Assessment (CSA) rating</li> </ul>   |                           |
|      | 6       | 6 Reporting of Local Emergencies | TTCS        | The TTCS believes that the plan lacks items such as how emergency responders deal with cases such as persons requiring immediate medical treatment, especially with respect to the need for blood and considering allergies and other complications | The ODPM should consider implementing an ICE (In Case of Emergency) database that <ul style="list-style-type: none"> <li>• Has data on every citizen in the country - including blood type, allergies, etc.</li> <li>• And offers access to the ICE database for protective services</li> </ul> |                           |
|      | 6       | 6 Reporting of Local Emergencies | TTCS        | During a disaster the number of emergencies can be overwhelming and there should be delegated response teams at a neighbourhood level or even street level.   | The ODPM should consider implementation of Community Based Disaster Recovery Reporters (CDDR) and Teams. The idea is to create small scale first responders for the   |                           |



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|      |         |   |             |   | community. The system can include community captains and even street captains to determine and fulfill immediate needs  |                           |
|      | 6       | 6 Reporting of Local Emergencies                        | TTCS        | The communications infrastructure among first responders and the ODPM does not appear to be standardised  | The TTCS recommends standardized communications infrastructure (voice, video and data) so that agencies can communicate more easily amongst themselves (ODPM, Police, Fire, Defense Force in the first instance.) |                           |
|      | 7       | 7 Implementation, Monitoring and Evaluation of the Plan | TTCS        | The document does not address evaluation of the plan, nor of the implementation of the plan. This is required to understand success and failures, which can lead towards development of a better plan the next time a disaster happens. | The TTCS recommends that Data Capture, Analysis, Reporting and the CSA Update takes place. Measuring effectiveness of the alerts is considered critical as well.  |                           |

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|      | 7       | 7 Implementation, Monitoring and Evaluation of the Plan | TTCS        |   | The TTCS recommends regular training and testing of all personnel expected to play a role in disaster recovery   |                           |
|      | 7       | 7 Implementation, Monitoring and Evaluation of the Plan | TTCS        | The TTCS notes that legislation is required for mandating test disaster recovery/continuity plans   | The TTCS recommends that legislation be enacted, mandating that organizations of national importance develop, implement and test disaster recovery/continuity plans as well as implement and overall ICT security policies.                  |                           |
|      | 7       | 7 Implementation, Monitoring and Evaluation of the Plan | TTCS        | Depending on the disaster, the electricity supply may be disrupted. The TTCS notes that legislation may be needed for implementing alternative power sources in the event of general power failure. | The TTCS recommends that the plan should reference methods that the population can use to charge their own communications devices. These may include solar chargers, hand cranked radios, generators, etc. The TTCS also recommends that the |                           |

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|      |         |                     |             |  | ODPM consider replicating the Florida action of removing sales tax on hurricane supplies before a hurricane hits.   |                              |
|      | Annex   | Annex 1             | TTCS        | <p>The list does not appear complete. Missing are (as an example):</p> <ul style="list-style-type: none"> <li>• Gun shooting rampage,</li> <li>• Looting,</li> <li>• Road accidents that block major highways,</li> <li>• Terrorism,</li> <li>• Invasion</li> </ul> <p>The type of disaster is not categorised e.g. the response and action for an earthquake might be different for that for a hurricane.</p> | <p>Consider adding the other items that the TTCS also believes to be disasters.</p> <p>A classification system should be implemented to determine the nature and type of response. Realistic simulations including personnel and equipment will identify any deficiencies in the plan, and these can be remedied.</p> <p>The TTCS notes that Cuba runs large scale simulations so that every adult member of the population knows where they have to go and what they have to do, before during and after a hurricane. Their system</p> |                              |

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|      |                |                     |             |   | should be studied and some of their best practices rolled into our plans.   |                              |
|      | Referenc<br>es | References          | TTCS        | Have a look at other references on what information and action is required for a disaster | <a href="https://www.ted.com/talks/caitria_and_morgan_o_neill_how_to_step_up_in_the_face_of_disaster">https://www.ted.com/talks/caitria_and_morgan_o_neill_how_to_step_up_in_the_face_of_disaster</a> |                              |