

30 November 2024

**The Director-General**

Department of Communications and Digital Technologies;

**For attention : Mr. T Ngobeni, Deputy Director-General : ICT Infrastructure Development and Support**

Per email: [mpaul@dcdt.gov.za](mailto:mpaul@dcdt.gov.za)

Dear Sir

**PROPOSED POLICY DIRECTION TO THE INDEPENDENT COMMUNICATIONS AUTHORITY OF SOUTH AFRICA  
ON PHASING OUT THE 10177, 10111 AND 107 EMERGENCY NUMBERS**

1. The Internet Service Providers' Association (ISPA) supports the proposed policy direction.
2. The submissions set out below are intended to provide the Minister and the Department with context relating to the successful implementation of a single emergency number for South Africa. They seek to emphasise the need for all stakeholders – including emergency services providers such as SAPS – to be involved in creating effective access to a single emergency number for South Africans.
3. The introduction to the draft policy direction notes the following:
  - 1.4 *Even though no public 112 Emergency Centre was established, electronic communications network service licensees use their own communications centres where the 112 - emergency number is routed to while others use Automatic Voice Response (AVR) to route the call to the relevant destination.*
4. ISPA submits that it is an oversimplification to state that licensees use either their own communications centres or route via an interactive voice response (IVR).
5. In practice, many emergency calls are not connected by licensees. This is because:
  - 5.1. There is a lack of clarity from the responsible parties as to where calls should be routed and what calls can be accommodated, particularly in the context of a non-geographic service type (i.e. where the number does not identify the location of the caller).
  - 5.2. Licensees make best-efforts to implement IVR's, but IVRs are routing the calls either to the wrong service provider contact numbers or to branches of the service providers that cannot respond to the caller because the caller is outside of their geographic coverage area.
  - 5.3. SAPS have refused and/or failed to provide the necessary information for their 10111 call centres to anyone other than Telkom. Telkom's own records of which numbers they map 10111 to are incomplete and based on their legacy fixed-line network. Mappings occur at a per-exchange level and seem to be updated as and when the local police request it.
  - 5.4. The same challenge applies with the 10177 code which is also mapped at exchange level.

- 5.5. It does not appear that even Telkom supports emergency calls on their VoIP services<sup>1</sup>.
6. In ISPA's understanding, the mobile network operators (MNO) – to overcome the above challenges - have, over time, built up their own database of contacts for local police, ambulances, fire services, sea rescue, etc.
- 6.1. This list is maintained largely through sheer volume of calls and their agents staying on the line with callers while attempting to contact the necessary service providers and continually noting who was answering, who wasn't, who could assist, who couldn't, etc.
- 6.2. The MNOs have also partnered with private ambulance services who, in turn, are obligated to assist any person in an emergency, including taking responsibility for contacting a state ambulance on their behalf if the caller cannot afford the private ambulance.
7. These measures are not available to SMME providers.
8. The absence of a centralized database of emergency providers numbers and areas of operation which is available to licensees responsible for routing calls to these providers means that licensees cannot correctly route emergency calls and consumers are unable to access emergency services.
9. What is critical is that inter-Ministerial and inter-Departmental mechanisms are utilised to ensure that SAPS, state ambulance services, and other state emergency services publish and share their 10-digit numbers and service areas with all licensees so that all licensees are able to route calls as required.
10. ISPA is sure that this information exists: it just needs to be collated and maintained, potentially by ICASA.
11. ISPA requests that – to the extent that it may be relevant – the above considerations find expression in the final policy direction.

Regards

ISPA Chairperson

(intended as an electronic signature)

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<sup>1</sup> See Telkom IP Voice – Product Description (Terms & Conditions). Available from [https://images.telkom.co.za/backend-files/2023-09/terms%20and%20condition%20Voip\\_0.pdf](https://images.telkom.co.za/backend-files/2023-09/terms%20and%20condition%20Voip_0.pdf)