Annex II Supporting Evidence

1. Making existing obligations in Article 109 EECC more efficient and effective.

The introduction of handset-derived caller location information, mobile based public warning, and equivalent accessibility in the EECC was a significant step forward for public safety in Europe, and improved our societies' ability to get help in emergencies and respond effectively to crises. Notwithstanding their overall success, certain drawbacks in their implementation have become apparent which reduce the efficiency of emergency response. To resolve this, EENA has identified several easily implementable but considerably value adding changes to the rules on caller location, public warning, and accessibility to help people in emergencies.

(i) Caller location

Executive Vice President Henna Virkkunen stated in April 2025, that "As every second counts during an emergency, improving response times and the capabilities of public responders would be vital" in the Digital Networks Act. Receiving handset-derived caller location information has been the biggest advancement of the last decade in reducing response times for emergency services, by providing an exact location of the caller and thereby greatly reducing the length of time required by emergency services to locate the person in need. This information is significantly more accurate than basic network-based caller location, which often provides locations within an area of several kilometres.

Handset-derived caller location also saves significant numbers of lives in the EU. The EU Funded Help 112 II project found that Advanced Mobile Location (AML) the current protocol used to transmit handset-derived caller location, saves up to 18.7 fatalities and serious injuries for every 100,000 calls received in participating countries, amounting to thousands of lives saved across Europe each year. By reducing injuries and deaths, and saving time for first responders, the net present value of AML for individual countries was estimated to be as high as EUR 11 billion. Since the finalisation of Help 112 II, AML has become more reliable and more accurate, increasing its value further. However, handset-derived caller location still suffers from several drawbacks which inhibits its effectiveness. As a result, EENA would like several changes to be made to Article 109(6) EECC, which sets the current rules for caller location.

Clarifying caller location criteria

Background

Article 109(6) EECC requires Member States to lay down criteria for the accuracy and reliability of caller location information, but offers no guidance for Member States on how to set or test these criteria. As a result of this, caller location criteria vary widely across Member States, and in many states are aspirational, rather than evidence based. In 2024, BEREC found that the existing EU guidance on setting these criteria was "insufficient,"

resulting in inconsistent implementation by Member States, and that setting clear criteria at an EU level would be beneficial.

To resolve this, the Digital Networks Act should include guidance from the European Commission on how to set and test caller location criteria. Harmonised European criteria should ensure higher reliability and accuracy of caller location across Member States.

Making altitude information mandatory for handset-derived caller location.

Background

Article 109(6) EECC does not specify whether altitudinal information should be included when transmitting handset-derived caller location, and in practice has been interpreted as only requiring latitudinal and longitudinal information.

Information on the altitude of a caller can be invaluable during an emergency, particularly during an emergency in a multistorey building. The International Association of Fire Fighters conducted testing on the value of this information, and found that "vertical altitude information can provide a substantial improvement in search effectiveness in multistorey structures, even without a precise floor number or a dispatchable address." As a result, in the United States, the Federal Communications Commission (FCC) has required altitude information to be provided in handset-derived caller location since 2023. With a significant proportion of the EU's population living and working in multistorey buildings, altitudinal caller location information can be critical to help first responders to usefully come to callers' assistance.

To resolve this Article 109(6) EECC should be amended to specify that handset-derived caller location should include the caller's altitude, as well as longitude and latitude.

Handset-derived location should be sent throughout emergency communications.

Background:

PSAPs typically initially receive handset-derived caller location information about 10 seconds after an emergency communication is initiated, with the caller's device sending updated information to the PSAP at regular intervals for the remainder of the communication.

While existing standards mean that handset-derived caller location information such as AML is updated regularly during emergency communications, in practice this information is not used in several countries with two stage PSAPs. In some of these countries, only the Stage 1 PSAP, which initially receives emergency communications receives handset-derived caller location information, before orally communicating the location coordinates of the caller to the Stage 2 PSAP, who organises the emergency response and may stay with the caller until emergency services arrive. As the Stage 1 PSAP typically processes calls for less than 60 seconds, this means that the Stage 2 PSAP must rely only on handset-derived caller location information received during the first 60 seconds or less of the emergency communication.

There are many situations in which the initial caller location information derived from a handset will not usefully help emergency services come to the callers aid, and thereby does not meet the standard required by the Court of Justice of the EU in Case C-417/18 of 5 September 2019.

For example, if a caller is moving, such as if the caller is driving towards the hospital while emergency services are sending an ambulance, the initial caller location will quickly become outdated. Regularly updated handset location information can help to precisely locate callers during emergencies with limited visibility, such as fires.

Issues may also arise if the initial information provided by handset-derived caller location is not accurate. Handset-derived location primarily relies on GNSS data, and will automatically turn on the devices GNSS receiver if this was not previously activated. In these situations the device may need up to 2-3 minutes to get an accurate GNSS, meaning that the initial location provided to PSAPs may not be accurate.

Finally, in countries with a two-stage PSAP structure, requiring the Stage 1 PSAP to orally communicate this location coordinates to the Stage 2 PSAP also wastes time and resources, and can result in mistakes.

How the DNA can ensure that handset-derived location usefully helps people throughout emergencies

Article 109(6) EECC should be updated to clarify that updated caller location information and other contextual information should be transmitted at regular intervals for the full duration of the emergency communication to enable the emergency services usefully to come to that caller's assistance. This update would mirror the language in Case C-417/18, and would improve the efficiency of emergency responses. It would also cost little to implement, as national infrastructure already exists to receive and process handset-derived caller location information.

Ensuring that emergency services receive updated caller location information for the duration of an emergency communication would also resolve situations where a call is transferred to a stage 2 PSAP or another emergency service that does not receive handset-derived location data. By requiring real-time location updates to be shared continuously during the call, and for this information to usefully aid emergency services, this amendment would oblige these PSAPs to either enable direct receipt of caller location information, or ensure that another PSAP monitors the data and provides updates to that emergency service as needed.

(ii) Consolidating public warning

Background

The inclusion of Mobile based public Warning in the EECC was a significant step forward for EU public safety; 22 EU Member States now have adopted Cell Broadcast or Location-

Based SMS public warning, allowing authorities to send warnings to their citizens before, during and after a crisis with vital guidance.

However, while the growing implementation of this new technology is positive, EENA has become increasingly concerned over how effectively this technology is being integrated into disaster response protocols. For example, poor integration of public warning into crisis response may have been an aggravating factor in the high death toll following the Spanish floods in October 2024, when significant delays in sending a public warning to the population were alleged to have been a significant factor in the eventual death toll of 200 people.

There appears to be growing recognition that EU rules on public warning need to go beyond mandating technologies and should instead prescribe additional characteristics to ensure it is effective. A 2024 Eurobarometer found that 79% of EU citizens want that the EU to complement national authorities and play a more active role in providing information and guidance to citizens during major crises. The Niinistö report and the Union Preparedness Strategy also identified public warning as being important for EU preparedness and resilience, but noted that it required certain criteria to be effective:

- The 2024 Niinistö report identified several criteria which an effective public warning system should have. This included multi-channel distribution (such as SMS, social media, and sirens), geo-targeting to allow for localised warnings, clear and brief messages, accessibility for people with disabilities or who speak other languages, regular testing, and regular education on how to respond to a public warning.
- The Union Preparedness Strategy similarly calls for fully interoperable, end-to-end and multi-hazard early-warning systems, and for the EU Digital Wallet to incorporate public warning capabilities. Finally Commission Executive Vice President Henna Virkkunen stated at EENA 2025 that public warnings systems should be improved so it can serve as a tool for authorities to save lives during crises.

Incorporating common characteristics would not only improve the quality of individual systems, but also facilitate the sharing of best practices, as Member States align the design of their systems. People travelling or working in other parts of the EU could also benefit from public warning systems with common characteristics, as education on how to respond to a public warning in one country would be more useful.

How the DNA can improve public warning

The DNA can build on Article 110 EECC by incorporating several characteristics which Member States' mobile based warning systems should include. These can build on those referred to in the Union Preparedness Strategy and Niinistö Report. In addition to including these criteria, Member States should be obliged to provide annual reports on whether their public warning systems meet the requirements of the DNA, and to provide information on how these systems are being tested.

To ensure that public warning is effective, the DNA should also remove Article 110(2) EECC, which allowed for other broadcast or app based public warning systems, provided that their effectiveness is equivalent. Mobile network based public warning has been found to be significantly more effective than app-based systems, as apps are not downloaded by the majority of the population.

(iii) Improving accessibility

Background

Article 109(5) EECC currently calls for people with disabilities to have equivalent access to 112. Delegated Regulation 2023/444 sets out six criteria for functional equivalence. These are that the communication is two way and interactive, is available without preregistration, including while in another Member State, that it is free of charge, is routed to the most appropriate PSAP, has caller location, and is publicised among people with disabilities.

The European Accessibility Act has identified two technologies as being functionally equivalent for people with disabilities; Real Time Text (RTT), and Total Conversation (TC). While these services are a step forward for accessibility, it is important to note that they do not provide full equivalence for certain groups such as the deaf community, which also rely on emergency accessible relay centres for sign language interpretation.

While EENA recognises the potential for RTT and TC of these technologies to significantly improve accessibility, issues in their implementation will result in these systems having significantly reduced added value for end users:

(i) While PSAPs in several countries are now able to receive RTT calls, as per Directive 2019/882, they still lack the technical equipment to properly process and pass on these communications to other emergency services, such as an Emergency Services IP Network (ESInet).

This can greatly undermine the effectiveness of RTT, as the initial receiver of the RTT will have to orally describe the messages from the caller to any other emergency services professional who may need to communicate with the caller, such as a medical professional, first responder, or a stage 2 PSAP in countries with multi-stage PSAPs, and then transcribe the responses from the emergency service professional. Orally relaying RTT conversations can also be more challenging than orally relaying SMS, as RTT messages are updated in real time.

(ii) While standards for RTT emergency communications in roaming exist, there is no harmonised, mandatory implementation across operators. As a result, each operator may provide support differently or not at all, depending on its technical setup and internal priorities. This leads to inconsistent support and functionality, which can impact reliability and safety.

This inability to properly process RTT communications, and lack of harmonised RTT standards is arguably contrary to EU law, which requires that users can use accessible services like RTT while in another Member State, and that the communications be routed to the most appropriate PSAP in an equivalent manner to other communications to 112.

How the Digital Networks Act can improve accessibility

Existing accessibility criteria should be extended to include an explicit obligation for both MNOs and PSAPs to ensure that that accessible solutions are designed and tested to be functional while roaming, and to ensure that RTT and TC conversations, as well as contextual data, can be processed and responded to in an equivalent manner to other emergency communications.

The best way to achieve the latter would be by using an ESInet so PSAPs can properly process and transfer ongoing RTT and TC communications to other PSAPs, and first responders. ESInets are IP networks which have been especially designed for PSAPs, and enable seamless transfers of different types of data and communications between different PSAPs and other emergency responders. These systems would also be beneficial when processing other types of accessible emergency communications, such as communications using sign language relay services.

2. Ensuring network evolutions do not reduce public safety

(i) Preparedness for future network shutdowns.

Background

Current State of Affairs

One of the main challenges facing emergency communications personnel is the ongoing 2G and 3G shutdown. The lack of stakeholder involvement in initial shutdown decisions and in the design of emergency communications over packet-switched emergency communications has resulted in several significant issues for access to 112, which are detailed in this EENA report. In addition, some 2G/3G reliant devices which are expected to remain on the market for decades will lose their ability to contact 112 after these networks are shut down. For example, all eCall devices installed in vehicles since 2017 are 2G and 3G reliant, meaning they will not function after these networks are phased out.

As a result, while packet-switched communications do bring opportunities for public safety, the poorly designed transition from legacy networks is endangering lives across the Union, and causing unnecessary additional costs for PSAPs, regulators and MNOs. This is likely why 41% of national regulatory authorities identified the 2G and 3G shutdown as a technical development most likely to affect end user rights in a December 2024 BEREC report.

How the Digital Networks Act can improve future networks shutdowns.

Therefore, EENA would like the DNA to amend Article 108 EECC to include language obliging PSAPs and providers of voice communications services to provide roadmaps to their Member States in advance of any future significant change in the networks used to provide access to emergency services. These roadmaps should include all necessary steps before this change to ensure uninterrupted access to emergency services for end users.

(ii) Protecting callback and caller location for all emergency communications

Background

Call back is crucial for emergency services for several reasons such as the call dropping, the need to follow up on a medical problem or to get extra information to come to the end user's assistance. Losing this possibility would therefore significantly reduce the safety of people in emergencies while travelling to other countries. Despite this, callback issues are currently faced by people roaming in another Member State in IMS[1], devices in Limited-Service State (LSS), and eCalls, the vast majority of which are in "permanent roaming". As PSAPs receive significant proportions of false eCalls, callbacks are used to

[1] Further details on this issue are described in this document

identify real emergencies. Without this, emergency services would have to respond to every false eCall they receive, or to no longer respond to unverified eCalls to save resources.

These issues will also prevent roaming and LSS devices from transmitting handset-derived caller location information to PSAPs (at least until the advent of SIP based location in several years). With 2.7 million roaming calls made to 112 in 2023 (a figure which excludes calls to other emergency numbers), removing handset-derived caller location alone would result in an 143-505 additional deaths and serious injuries annually, based on EU estimates of AML's effectiveness.[2]

How the Digital Networks Act can guarantee PSAP callback and caller location for everyone.

Article 109 EECC should be amended to include a universal right to callback by PSAPs to all forms of number based interpersonal communications which initiate emergency communications. This explicit right to callback would protect roaming calls and other types of emergency communications which face recurring issues with callback, including Limited-Service State calls, and eCalls.

To remove any uncertainty about the right to callback for eCall, a targeted amendment should also be made to Article 97(1)(b) EECC to add "international numbers" to the types of numbers which end users should be able to access. Many of eCall modems use international +882 and +883 numbers to contact emergency services in the event of a crash, which are often blocked by network operators and PSAPs due to their historic uses. This amendment would oblige MNOs and PSAPs to unblock these numbers.

In order to resolve issues affecting caller location, a similar, more targeted amendment should be made to Article 109(6) EECC to ensure all end users can transmit handset-derived and network based caller location to PSAPs, wherever technically feasible. A recital or other clarifying text should specify that "technically unfeasible" does not include cases where new architectures are incapable of supporting handset-derived location, are adopted, while existing, compatible alternatives are available.

[2] The technology is estimated to prevent 5.3 to 18.7 deaths and serious injuries for every 100,000 calls. This figure is likely an underestimation, as the reliability of this technology has increased since the tests completed in 2020, roamers may struggle to indicate their location to a greater extent than in typical emergency calls due to language restraints or poor local knowledge, and as the number of roaming calls used for this calculation exclude calls placed to other emergency numbers.

3. Crisis-proofing emergency communications

(i) Using emergency satellite communications to boost resilience

Background:

Smartphones are now able to connect with satellites in Low Earth Orbit to send communications in areas without a terrestrial cell connection. This technology, known as Direct to Device (D2D) was first approved for use in the United States in November 2024, with market implementation beginning in 2025 in several countries. Within the EU, several mobile operators have partnered with satellite providers to provide direct to device emergency communications for their users, with emergency communications being identified as a key first use for D2D. However, this use case needs to be developed in consultation with emergency services to add value during emergencies.

This new technology also presents some open questions and challenges for emergency communications professionals. Number based interpersonal D2D communications fall under the scope of Article 109 EECC. As a result number based D2D emergency communications must meet Article 109 EECC's requirements where feasible, including routing, caller location, and being free of charge for the user. The most complex of these issues will likely be routing, which will function differently to terrestrial emergency communications. More information on these issues can be found in EENA's report on using D2D for emergency communications.

EENA's report on emergency satellite communications identified two main benefits for D2D. The first, is to improve access to 112 in remote unpopulated areas, such as rural roads, mountains and maritime areas, which may lack connectivity, though currently this technology is not capable of meeting the bandwidth requirements for universal service obligations, and therefore cannot be used to provide this service.

The second and most important use case was to use D2D as a fallback network which people could use to access emergency services, or contact family and neighbours following an event which causes terrestrial networks to fail. Examples of recent events in the EU which causes telecommunications to fail include the 2025 power outages in the Iberian Peninsula, and power failures in the West of Ireland following Storm Éoywn in January 2025. EENA has received anecdotal information of a significant increase in Satellite SOS messages being received by PSAPs during these events. The importance of fallback connectivity following a ground-based disruption is particularly important as the causes of these disruptions, such as earthquakes and storms, are correlated with an increased demand for emergency services.

D2D has also been identified by the European Commission, the European Parliament and the Council of the EU for its potential to improve emergency communications. Executive Vice President Henna Virkkunen stated in April 2025 that D2D could complement coverage of mobile network operators for emergency communications in underserved areas. The Council's June 2025 Conclusions on reliable and resilient connectivity also

noted that satellite systems such as D2D could provide "critical redundancy and resilience against ground-based disruptions, which are particularly important for the provision of safety and disaster relief services in all circumstances." The European Parliament's own initiative report on European Technological sovereignty and digital infrastructure also identified satellite communications as a technology which can contribute to citizens welfare, and which could improve connectivity in rural areas and enhance economic resilience. The high geographic coverage that can be reached with a small number of satellites can make them a very cost-effective low bandwidth fallback communications network.

How the Digital Networks Act can improve emergency satellite communications

The Digital Networks Act should explicitly extend the scope of Article 109 and 110 EECC to include Emergency Satellite Communications. This would ensure that people in emergencies in areas without terrestrial connectivity can access 112, though it is important to note that D2D is not capable of meeting the bandwidth requirements for universal service obligations, and therefore cannot be used to provide this service instead of other networks.

Future secondary legislation could be proposed to develop common standards for receiving this new type of emergency communication, in cooperation with organisations representing first responders and citizens in emergencies. In particular, the DNA should address issues outlined in EENA's report on emergency satellite communications, and other issues such as the consequences of satellite networks potentially routing EU emergency communications data through third countries when routing 112 calls.

(ii) Improving Network Resilience

Background

Major power outages in Spain and in the west of Ireland in January 2025 resulted in telecommunications networks failing for extended periods. For example, in Spain it was reported that while initially 70% of one Mobile Network Operator (MNO)'s cell towers had independent power generation and were functioning after the power outage, these cell towers gradually lose power, with just 20% of areas in some regions having coverage by 11pm that day. As a result of this loss of coverage, people in emergencies were unable to place calls to 112. Outages can also impact emergency response, with PSAPs unable to reach first responders, while first responders are unable to coordinate effectively.

Sufficient independent power generation capabilities in cell towers is critical to ensure uninterrupted connectivity following power outages. Most cell towers in Europe include a battery, allowing it to run independently for a short period following a power failure. The amount of time which countries require these towers to be capable of running independently varies considerably by Member State, from 15 minutes to several hours. While upgrading this infrastructure may be costly, it can improve safety and resilience, and mitigate the substantial impact on GDP caused by power outages.

In the UK, Ofcom recently published a report which found that about two thirds of the UK's population would be able to make an emergency communication for one hour after a power outage, with the remaining third not being able to do so. However, fewer five percent of these sites had backup power to provide coverage for six hours or more. It estimated that upgrading the network to ensure continued coverage for four hours following a power outage was possible, but would come at a cost of one billion pounds. Outside of the UK, Ofcom found that some countries had taken a risk-based approach to independent power generation, obliging higher power generation capabilities for cell towers in more isolated or vulnerable areas. This included Norway, where rural towers required power backup for four hours following a blackout compared to two hours in urban areas, and Australia, which requires 72 hours backup in very remote areas

While funding improved network resilience is generally the responsibility of MNOs, Ofcom identified examples of public funding being used to increase resilience in remote areas. This could ease the financial burden of MNOs in complying with new, higher standards. The European Parliament and Council appear to be open to public funding to improve resilience, with the former's recent report on digital infrastructure calling for public action to incentivise upgrades to improve digital infrastructure's resilience, including through public-private investments, and the latter's Conclusions on reliable and resilient connectivity supporting public action to improve telecommunications and power resilience, including financial support, and noting the particular importance of uninterrupted connectivity during emergencies.

Events which can lead to network failures are unfortunately not limited to power failures. Outside of power outages, network resilience includes resilience from several other threats, such as cyber threats, human errors, and natural disasters such as earthquakes. Outages in PSAPs can also have a considerable impact on access to 112. For example, in May 2025, a PSAP in Aragon, Spain had an outage lasting several hours which resulted in an unknown number of calls to 112 failing. Member States, MNOs, and PSAPs should ensure that their PSAPs and telecommunications networks take an all-hazards approach to resilience, so that people can continue to access 112 at any time during a crisis.

How the Digital Networks Act can improve network resilience

The DNA should incorporate minimum criteria for network resilience, including criteria connected to uninterrupted connectivity following a power failure. This should include a risk-based approach to independent power generation, ensuring that cell towers can continue providing emergency connectivity until operators in that area can be reasonably expected to restore power or bring supplementary backup power generation. Satellite networks could also be used to provide fallback connectivity to 112 when telecommunications networks fail.

Outside of power outages, the DNA should also incorporate minimum criteria to improve network resilience from other threats, such as cyber threats, human errors, and natural disasters such as earthquakes. To improve compliance, these new obligations should be

accompanied by an obligation for Member States to report outages in access to 112, whether due to a PSAP failure or a wider power or telecommunications network failure.

4. Future Proofing Public Safety

(i) Ensuring that new forms of emergency communications can be transferred and processed in an equivalent manner.

Background

Emergency communications in Europe are currently mostly routed to the most appropriate PSAP based on the location of the caller's nearest cell-tower. Over the last decade multiple new communications services have been introduced which can improve access to 112, but which cannot use cell-based routing. These include emergency satellite communications, and the growing use of Number Independent Interpersonal Communications Services (NIICS). The growth of both technologies was identified as some of the most significant market trends impacting end users rights by national regulatory authorities in a December 2024 BEREC report, but cannot be used effectively in some Member States due to a lack of suitable routing mechanisms.

The increasing diversity in the forms of emergency communications received by PSAPs over the past decade has been accompanied by an increase in the types of data which PSAPs are required to receive and process. This ranges from new types of emergency communications to the receipt of additional data such as pictures and videos during an emergency communication. Some of these innovations, such as RTT, are required by EU law to be processed in an equivalent manner to calls to 112.

However while these new forms of communications have the potential to improve public safety, their value will be greatly undermined if PSAPs are unable to route and process them in an equivalent manner to other emergency calls to 112. During an emergency communication, calls, RTT messages, and other types of communications may need to be routed to several different PSAPs, first responders or other emergency communications professionals to ensure that the person in an emergency receives help from the professionals who are best suited to help them.

How the DNA can help PSAPs route and process new emergency communications

Article 109 EECC should introduce an obligation for PSAPs to ensure that all emergency communications made to the number 112 by number based interpersonal communications can be transferred and processed in an equivalent manner, including when those communications are made using multi-media or non-cellular number-based communications services. Systems which can transfer and process these communications in an equivalent manner exist, and include using an Emergency Services IP Network (ESInet) and Next Generation Core Services (NGCS), as described in ETSI Technical Specification (TS) 103 479. ESInets are IP networks which were created specifically for PSAPs, and can seamlessly receive and route different types of emergency communications data between PSAPs and other emergency communications professionals.

(ii) Facilitating International Emergency Communications

Background

Europe is becoming ever more multinational; 17.9 million people living in the EU on 1 January 2024 were born in another EU country. Every day, 3.5 million people cross borders in Schengen for work or travel. Situations where an individual may need to place an emergency communication on behalf of another person in another country are therefore growing, with PSAPs receiving thousands of such calls annually.

Access to 112 in these situations is hampered by a lack of procedures for routing international emergency communications in some Member States. An individual Member State can have hundreds of different PSAPs, making it difficult for PSAPs in another EU Member State to identify where they should forward an emergency communication to. To resolve this, Article 109(8) EECC establishes that a directory of E.164 numbers (long phone numbers) for emergency services in each EU country should be established, with this Directory currently being maintained by the CEPT. However, several countries have declined to submit numbers to this Directory, as they have not designated a single long number for an emergency service which can receive these calls on behalf of other PSAPs.

Beyond international emergency calls, some other emergency communications services are limited by the absence of clear routing procedures, particularly when a Member State has not designated a most appropriate PSAP for their service, or provided the service with E.164 numbers for all PSAPs in their jurisdiction. For example, accessible relay centres for sign language interpretation may struggle to relay communications for end users who contact them when facing an emergency in another country, as they lack an agreement with all PSAPs in that country. Outside of international emergency calls, discussions over which PSAP should be responsible for receiving new types of emergency communications, such as emergency satellite communications, can also hamper their implementation in some countries, as providers may want to initially deal with an individual PSAP in a country, rather than several hundred.

How the DNA can facilitate international emergency communications

Article 109(8) EECC should introduce an obligation for Member States to designate a single entry point which can receive international emergency communications and other types of emergency communications for which a most appropriate PSAP cannot be immediately identified. To remain within the scope of Article 109 EECC, this could be limited to emergency communications on these services to the number 112, and to accessible equivalents. Once these single entry points were established, Member States should be obliged to add the E.164 number of that single entry point to CEPT's PSAP Directory.

Identifying a single entry point in each country would have very low costs for emergency services, and require no implementation for countries which do not have multiple PSAPs.

As the scope of this obligation would be limited to atypical communications for which the Member State hasn't yet identified a most appropriate PSAP, and as the number of calls received for these services would be low, creating a single entry point would not impact the wider organisation of emergency communications in that Member State.

(iii) Ensuring 112 Communications from Number Independent Interpersonal Communications Services can be received by PSAPS

Background

The obligations of Article 109 EECC are currently limited to providers of Number Based Interpersonal Communications services. However there have been calls for its scope to be expanded to also cover providers of Number Independent Interpersonal Communications Services (NIICS), while the rising growth of NIICS has been identified by National Regulatory Authorities as a significant market development which could affect end users' rights.

PSAPs in some Member States already indirectly receive limited types of NIICS emergency communications, such as communications from Apple's Emergency SOS via Satellite service. However these are relayed to them using third party services, such as emergency satellite relay centres, as PSAPs are unable to directly receive NIICS based communications. This is because NIICS cannot use cell-based routing, and countries lack an individual entry point which these communications can be routed to. The use of relay centres in these contexts delays access to 112, and would be impractical if larger NIICS services such as messaging apps were obliged to provide access to 112.

As a result, if the Digital Networks Act expands the existing obligations of Article 109 EECC to also cover NIICS, or if Member States individually decide to receive emergency communications from NIICS, there will be a clear need to establish a single entry point so that NIICS can be directly routed to PSAPs.

How the DNA can future proof emergency communications

If the scope of Article 109 EECC is expanded to include NIICS, Article 109(8) EECC should introduce an obligation for Member States to designate a single-entry point, which can directly receive emergency communications from NIICS, and oblige Member States to enable access to this end point for any NIICS providers which are authorised to enable emergency communications in their jurisdiction. This could include an entry point to an ESInet.

If the scope of Article 109(8) EECC is not expanded to cover NIICS, Member States may still independently authorise NIICS to provide access to 112. In this situation, Article 109(8) EECC should oblige Member States to designate a single-entry point which can receive emergency communications from NIICS before authorising any NIICS provider to

provide access to 112, and to enable access to this end point for NIICS providers which are authorised to enable emergency communications in their jurisdiction.