EENA's response to the European Commission consultation on its draft White Paper 'How to Master Europe's Digital Infrastructure Needs'

The European Emergency Number Association (EENA) welcomes the draft White Paper on "How to Master Europe's Digital Infrastructure Needs" and appreciates the opportunity to comment on this important document. We recognise the critical role of advanced digital infrastructure in enhancing emergency communications and ensuring the safety and security of citizens across Europe. However, we are concerned about the very limited number of references to citizens' rights, in particular regarding accessibility matters. This is reflected in the low salience of emergency communications in the White Paper and the absence of reference to Public Warning Systems, which should be of paramount importance, especially at a time of war at the border of the European Union.

Regarding today's challenges, we commend the White Paper's support for the transition to 4G and 5G networks. These technological advancements are expected to significantly improve emergency communications by enabling faster and more reliable data transmission. However, it is crucial to ensure that during the transition from circuit-switched to packet-switched networks, continuity of access to emergency services, including eCall, is maintained. In this regard, the White Paper highlights the importance of the coordinated switch-off of 2G and 3G networks and the corresponding need to implement solutions for continuous support of important legacy services such as emergency and critical communications (e.g., eCall).

EENA welcomes the Commission's recognition of the need for such solutions, but robust mechanisms are required to ensure that emergency services remain accessible from legacy devices and services throughout the transition process. This is crucial for the protection of citizens and, particularly those in areas with no immediate 4G or 5G coverage. Additionally, it is important that education and awareness campaigns are implemented to inform citizens about the transition and the need to upgrade their devices in due time to maintain the ability to access to emergency services when needed. Uninterrupted access to the emergency numbers is vital for public safety and must be guaranteed throughout this technological shift.

There are also several key areas where the European Commission must focus its approach to ensure that emergency communications are integral to future developments:

- As the European Commission considers new legislative acts, it is essential that access to emergency communications is part of it. For instance, reflections on the role of satellite communication services in tomorrow's universal service should also consider obligations on the provision of access to emergency services through emergency communications.

- The virtualisation and cloudification of sectors, as highlighted in the White Paper, should also apply to emergency communications. Developing Emergency Services IP-Networks (ESInets) is crucial for modernising emergency response systems. These networks will also facilitate secure and efficient data exchange between Public Safety Answering Points (PSAPs), enhancing the coordination and responsiveness of emergency services across the EU.

Establishing a secure European framework for these networks is essential to leverage the full potential of digital infrastructure for public safety.

- As Public Safety Answering Points (PSAPs) transition to packet-switched infrastructure, prioritising their cybersecurity becomes even more crucial. Protecting these critical infrastructures from cyber threats is essential to maintain the integrity and reliability of emergency services. Implementing robust cybersecurity measures and standards should be a core component of the EU's strategy on resilience and protection of digital infrastructure to safeguard against potential disruptions and attacks.

The current geopolitical context, marked by the ongoing war at the border of the European Union, underscores the urgency for investments and actions in highly performing emergency communications. Effective and secure emergency services are essential for public safety and crisis response. Therefore, it is imperative that the EU continues to prioritise and fosters the development and protection of these systems within its digital infrastructure strategy.