

Open Letter on Improving Accessibility in Emergency Communications

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Despite existing EU legislation and improvements in Member States' emergency services, many people with disabilities currently lack equivalent access to emergency services via 112. Poor implementation of EU law and a lack of common features across Member States has inhibited the usability of accessibility features.

Real Time Text (RTT) and where available, Total Conversation, are outlined as functional equivalents to emergency communications for people with disabilities by the European Accessibility Act. Member States are obliged to implement native RTT by 28 June 2025, or by derogation, 28 June 2027, and to implement Total Conversation by that date where it is available on their mobile networks. As an interim solution and until RTT and TC are natively available, Member States have developed alternative means to access 112, including mobile apps and SMS.

However, while these technologies should provide a functionally equivalent means to access emergency services for people with hearing disabilities, they do not necessarily address the accessibility requirements of other users.

Among others, Blind and partially sighted people, people with intellectual disabilities, people with speech disabilities as well as other users may have difficulties in communicating certain information, and particularly location information while calling 112. One of the most effective means to improve the accessibility of 112 for these groups has been the introduction of advanced caller location in 24 EU Member States.

The introduction of technologies such as Advanced Mobile Location (AML) has allowed emergency services to automatically receive an accurate description of the caller's location during an emergency communication. This technology is highly beneficial for all callers, but is particularly beneficial for people who may find it difficult to assess and describe their exact location. **Unfortunately, the value of this service is undermined by the lack of implementation of AML by Poland, Cyprus, and Malta.** In addition, in other Member States, this service is not available on all emergency numbers, undermining its effectiveness.

In addition to this, many accessible communications features, such as SMS, are not considered emergency numbers and therefore do not include caller location information. Many of the other forms of accessibility used by Member States, such as apps, websites and relay services, also may not send caller location to the PSAP. This significantly impacts the accessibility of 112 for people with disabilities, particularly for groups which may have additional difficulties in describing their location, and should be resolved.

This situation is in clear breach of Article 109 (6) of the European Electronic Communications Code (EECC) and the European Commission's Delegated Regulation 2023/444, which established that equivalent access for persons with disabilities is ensured when accessible means:

- i) Enable two-way interactive communication between the user with disabilities and emergency services;
- ii) Be available without pre-registration to all people with disabilities, including those travelling from another country;
- iii) Be free of charge;
- iv) Be routed without delay to a PSAP (emergency services contact point) that is qualified and equipped to appropriately answer communications from people with disabilities;
- v) Include equivalent levels of caller location information to those provided for other emergency communications;**
- vi) Have the same level of awareness among people with disabilities as the number 112 has for the wider population.

Therefore, EENA and (other organisations) call for

1. Poland, Cyprus and Malta to immediately implement advanced caller location to improve accessibility for blind and partially sighted people, and people with intellectual disabilities.
2. For the 24 Member States with AML to ensure that this service functions on all of their other emergency numbers, where these exist.
3. For the European Commission to monitor the situation and use available tools to enforce European legislation, including infringements procedures.
4. All Member States to ensure that their accessible means to contact 112 include advanced caller location.
5. Member States ensure that disability is mainstreamed into their emergency communications protocols, including through training for call handlers, and by ensuring that communications use clear, accessible language.

Signed



European Emergency
Number Association



European Disability Forum



European Blind Union



Cyprus Confederation of
Organisations of the Disabled



Polish Disability Forum (PDF)



Malta Federation of
Organisations for
People with Disabilities