

Brussels, 28.11.2025

Executive Vice President Henna Virkkunen

Executive Vice-President of the European Commission for Technological Sovereignty, Security, and Democracy

European Commission
Rue de la Loi / Wetstraat 200
1049 Brussels
Belgium

Dear Executive Vice President,

Europeans have lost the ability to contact emergency services while roaming inside and outside of the European Union. I initially raised this problem with your predecessor in 2022 and again in 2024, when the Commission acknowledged the seriousness of the situation and noted that it was being examined within several workstreams of the Commission's services.

Two years later, there has been no meaningful improvement, and as 2G and 3G networks begin to switch off across Europe, the situation has deteriorated.

112 is the first line for everyone in a personal emergency or wider crisis, making this issue of critical concern for both public safety and societal resilience, and requiring urgent action from the European Commission. If European action is not taken now, mobile network operators will also face considerable future costs, as Member States will eventually have to further delay the switch off of 2G/3G networks until the issue is resolved.

1. A persistent and growing threat to emergency access

The phase-out of 2G and 3G networks worldwide has exposed serious incompatibilities between smartphones and the 4G/5G voice services required for emergency communications (VoLTE/VoNR). All emergency numbers worldwide, including the European Emergency Number 112 depend on these capabilities to function.

The Commission's reply to my March 2024 letter confirmed that the standards are technically sound, and that the root causes lie in a lack of interoperability, commercial agreements, and technical support between handset manufacturers and mobile network operators. It claimed that the situation would gradually improve as VoLTE roaming agreements increased.

Unfortunately, this has not happened.

2. Critical issues emerging within Europe

EENA has been informed of a growing number of cases where Europeans inside the EU/EEA:

- Cannot place voice calls,
- Cannot receive voice calls,



info@eena.org



Avenue de la Toison d'Or, 79
1060, Brussels, Belgium

- Cannot call 112 in an emergency. These issues can affect anyone in an emergency while roaming, and the owners of certain handsets in both roaming and non-roaming scenarios, as publicly announced by the Swedish Regulator PTS¹. EENA is happy to share any additional information with the European Commission.

While these issues are not occurring in every instance, they demonstrate that Europeans who travel between EU Member States no longer have a reliable means to contact emergency services if they find themselves in danger.

As the first people lose their lives after being unable to contact emergency services questions will be asked as to why regulatory action was not taken at a European level to resolve this issue.

3. Additional widespread issues for caller location, prioritisation and call-backs while roaming

Moreover, even when callers manage to successfully reach 112 while roaming, the ability of emergency services to respond is now significantly hindered by mobile network operators' widespread adoption of S8HR roaming. Under this architecture, roaming emergency calls are delivered as "anonymous calls", depriving emergency responders of essential caller information. Operators have broadly implemented S8HR because it greatly simplifies VoLTE roaming and avoids the need for complex bilateral IMS interconnections.

It is also likely that cost considerations played a role, as S8HR is considerably cheaper to deploy and maintain compared to full IMS interconnection. However, these design choices have direct and serious consequences for the reliability and effectiveness of emergency communications.

Among other issues, devices placing anonymous calls are typically unable to transmit handset-derived caller location to emergency services. In addition, the usual emergency-call priority mechanisms in the radio network may not be applied, making it harder for the call to be established during periods of congestion. Emergency services are also unable to call back these devices if the call drops or if additional information is needed to provide assistance.

This creates a structural risk that emergency responders may receive incomplete or inaccurate information, or be unable to re-establish contact with the caller, potentially delaying help at moments when time is critical.

A written Parliamentary question was also recently submitted by an MEP to the European Commission on this issue, however this question has not yet been answered.²

4. Severe problems now public: The Australian case

Recent public reports from Australia, where the final 2G/3G network was shut down in 2024³, highlight serious and widespread failures of roaming voice services, including:

- Europeans travelling to Australia who cannot make or receive any voice calls, including calls to emergency services.

¹ Public information on this issue includes this recent press release from the Swedish Regulator: <https://www.pts.se/en/news-and-press-releases/operators-must-ensure-access-to-112--certain-mobile-phones-will-be-blocked/>

² https://www.europarl.europa.eu/doceo/document/E-10-2025-003985_EN.html

³ <https://www.infrastructure.gov.au/media-communications/phone/mobile-services-and-coverage/3g-network-switch>



- Roaming devices being unable to access emergency numbers despite being connected to the visited network for data services
- National authorities in Australia having to publicly acknowledge the failures and call for urgent fixes.

These failures mirror exactly the concerns we raised in 2022 and 2024. They show that the global ecosystem is not converging toward stability, but instead remains fragmented, inconsistent, and dangerous.

5. Persistent failures for EU travellers to the United States

According to our information, the situation in the United States remains unchanged since I first wrote to the Commission in 2022. Many Europeans continue to lose all voice-calling capability, whether emergency or non-emergency, when roaming in the US, as circuit switched fall back (CSFB) is no longer available and VoLTE interoperability is not assured.

6. The need for firm action and regulatory leadership

The European Commission has repeatedly recognised the seriousness of this issue. But the evidence shows that the problem cannot be left to market convergence or voluntary technical alignment.

The safety of Europeans requires:

- **Stronger and clearer obligations** on handset manufacturers and mobile network operators to **guarantee interoperability** for 4G/5G voice services and emergency calls while roaming.
- **A coordinated EU approach** across DG GROW, DG CNECT, BEREC, standardisation bodies, and national regulators to resolve intra-EU roaming issues, and active diplomatic engagement with non-EU jurisdictions to resolve external roaming issues. We doubt that U.S. authorities would tolerate a situation in which their citizens could not reach emergency services while travelling in the EU; the same standard should therefore apply in the opposite direction.
- **Monitoring and publication** of known interoperability failures affecting callers, both inside and outside the EU.

7. Request for update and immediate measures

Given the deterioration of the situation, I would be grateful if you could inform us:

1. **What concrete follow-up actions the Commission has taken** since March 2024 to address this issue, for both intra-EU roaming, and roaming outside the EU.
2. **What steps the Commission will take** to address emerging failures within the EU, including any regulatory actions to guarantee that emergency calls work reliably for everyone, in all circumstances.

We stand ready to support your teams with evidence, documentation, technical input, and contacts within Member States and operators.

Access to emergency services is a fundamental right. Today, in 2025, that right is no longer guaranteed for millions of Europeans when they travel. The situation requires decisive action.



info@eena.org



Avenue de la Toison d'Or, 79
1060, Brussels, Belgium

Given that both 112 and roaming fall under European regulation, it is essential to underline that when 112 calls fail - and they will, if the situation remains unchanged - the responsibility will inevitably rest with the European Commission for not ensuring access to such vital services across the Union. Addressing this issue is therefore urgent not only to safeguard lives, but also to avoid reputational damage to the European Commission and the European Union as a whole.

I thank you for your attention to this matter and remain at your disposal for further discussion.

Yours sincerely,

Gary Machado

Executive Director

European Emergency Number Association (EENA)



info@eena.org



Avenue de la Toison d'Or, 79
1060, Brussels, Belgium