The Digital Networks Act – An Opportunity to Build a Safer and More Resilient EU

112 is the first line of defence for people in a crisis. When a disaster strikes, it allows any person in danger to contact emergency services, to share critical information with authorities, help others, or get help if they need it. In parallel, public warning systems alert the population to imminent dangers and provide real time updates during emergencies, providing advice, and reassuring citizens that civil authorities are working to help them.

While the number of crises where citizens need emergency communications has grown significantly since the application of the EECC in 2020, threats to the quality and availability of these services have grown in parallel. Most critically, network outages during geopolitical and climate crises have left people unable to place emergency calls or receive public warnings. At the same time, unresolved issues for access to emergency services over 4G and 5G have left citizens with reduced or even ineffective access to emergency communications. Without further action, Europeans risk being left with weakened access to emergency services, even as our population ages, and threats to our stability grow.

As a result, EENA strongly welcomes the European Commission's decision to use the Digital Networks Act (DNA) to address many of the challenges currently facing emergency communications, and to ensure that these systems, as well as the networks that support them, are resilient and capable enough to protect EU citizens.

The DNA includes new measures to improve network resilience and protect emergency communications during technological transitions, addressing two of the key challenges affecting the availability of 112. New measures on private networks, number independent services, and callbacks will also improve the quality of emergency communications, helping first responders to reach citizens faster.

To ensure that the proposal's ambitions are fully met, EENA has identified targeted changes that could improve clarity and facilitate implementation. These include clarifying rules on callbacks and the EU Digital Wallet, preparing PSAPs for new types of emergency communications introduced by the DNA, and aligning public warning and caller location requirements with emerging best practices.

EENA Proposals for Emergency Communications

(i) Maintain new rules on improving the quality and availability of electronic communications and emergency communications.

The proposals in Part II of the DNA for electronic communications networks and services to cooperate to ensure connectivity during crises is a significant step forward for public safety in Europe and must be kept in the DNA. As a complement to the NIS2 Directive, which sets rules for individual operators but does not address sectoral cooperation or the specific needs of emergency communications, it can facilitate sector-wide responses to major disruptions which individual networks would be unable to respond to on their own.

Since 2025, major outages caused by technical failures, natural disasters and conflict have left people across Europe without access to emergency communications or public warnings when they need it most. The correlation between the causes of many network outages, such as storms and conflicts, and increased need for emergency services makes this vulnerability a serious threat to public safety and societal resilience.

The proposals in Article 5 of the DNA to require cooperation between communications providers and public authorities to ensure connectivity during crises, and to take all necessary measures to maintain emergency communications, critical communications and public warnings is therefore an important step to overcoming this vulnerability.

The effectiveness of this new obligation will depend on the quality of its implementation across the European Union. EENA therefore welcomes the requirement for communications providers and public authorities to take utmost account of the BEREC Union Preparedness Plan for Digital Infrastructures when cooperating. This report will help build a baseline for telecommunications resilience, and ensure that cooperation is based on best practices.

(ii) Maintain new rules on protecting emergency communications during network transitions

Article 5(3) and 5(4) of the DNA have the potential to resolve many issues affecting access to emergency communications during future transitions to new technologies, even if they will likely come too late for the 2G and 3G shutdown. For example, some phones are unable to make a call to 112 over 4G and 5G, despite being able to place calls to any other number. Many others are unable to transmit caller location or callback information to emergency services, especially while roaming. A lack of end-to-end testing and validation of emergency communications over 4G and 5G have meant that serious issues for access to emergency services over these networks did not emerge until 2G and 3G networks are phased out. A lack of clarity on when 2G and 3G networks will be shut down has also inhibited progress in solving these issues.

New requirements in Article 5(3) for electronic communications providers and PSAPs to take all necessary measures when implementing new technologies, including testing and validation, to maintain the quality of access to emergency communications are therefore strongly welcomed and should be maintained in the text. The obligation in Article 5(4) for

communications providers to provide authorities and end users with a two-year roadmap before shutting down these technologies will give all stakeholders enough time to adapt and carry out end-to-end testing across devices, networks and PSAP systems before these shutdowns.

As failures can occur anywhere across the telecoms, routing, platform, handset, roaming and public warning ecosystem, Member States should also appoint a custodian to oversee the emergency communications ecosystem and ensure it is coordinated, connected and responsive. This would follow the best practice set by Australia, which appointed a national emergency communications custodian to address the growing complexity of ensuring emergency communications over IMS.

A national Emergency Communications Custodian would provide a clear point of accountability, ensure end-to-end oversight across all relevant actors, conduct regular resilience testing, and coordinate preparedness before failures put lives at risk.

(iii) Ensuring PSAPs can receive emergency communications

The Digital Networks Act widens effective access to emergency communications to reflect ongoing developments in connectivity. For the first time, network operators must ensure that private networks, EU digital wallets and network independent communications services can be used to contact emergency services. Satellite communications networks, including direct to device networks, are also obliged to provide access to emergency services.

However, these reforms are undermined by a lack of corresponding obligations for PSAPs to receive and route these new types of communications. Emergency communications such as satellite calls and network independent services cannot be routed to the most appropriate PSAP in the same manner as terrestrial voice communications services. These communications instead need to be routed to a single IP gateway in each country. While standards exist to enable this routing,[1] some national PSAP systems still lack this capacity. This could result in PSAPs being unable to receive or process emergency communications mandated by the DNA.

To ensure effective emergency communications and a balance of obligations between all stakeholders, Article 106(4) should clarify that national PSAP systems and Interpersonal communications service providers should ensure that emergency communications and automatically transmitted contextual data are routed without delay to the most appropriate PSAP, including when emergency communications are originated over satellite networks or network independent services. In addition, Article 106(4) should require national PSAP systems to establish a single IP gateway to receive these types of emergency communications.

[1] The main standard is ETSI 103 479

(iv) Allowing emergency services sufficient time to call back people in emergencies.

EENA welcomes the proposal in the Digital Networks Act to require network operators to ensure that PSAPs can call back people in emergencies. This requirement will address rising issues for callback in eCall and in roaming scenarios, where certain roaming architectures have left PSAPs unable to call back people who face an emergency while travelling. This reform will also allow emergency services to call back people who contacted them while in limited-service state, or over a Wi-Fi connection.

EENA's initial consultations with emergency services have demonstrated that callbacks primarily occur in four scenarios: [2]

1) Where the call drops or is suspiciously cancelled;
2) Where a doctor needs to call back the person to give medical advice;
3) To callback all missed emergency calls following a network failure; and
4) Where first responders need more information or are unable to find the person in an emergency.

The latter three scenarios can take place several hours after the initial emergency call, or significantly longer during natural disasters, or if roads are obstructed or icy.[3]

That notwithstanding, the Digital Networks Act should ensure that callbacks remain available for at least a length of time sufficient for PSAPs and emergency services to contact the person at any time until first responders come to their aid**.**

(v) Expanding caller location rules to include national numbers.

The inclusion of handset derived caller location was the most important technological advancement for emergency services in the European Electronic Communications Code (EECC). Handset-based location technologies use GNSS and Wi-Fi based location information to estimate the caller's location and send this to emergency services with an accuracy of just metres, substantially reducing the time needed to locate people in emergencies. The DNA recognises that these technologies have proven to be significantly more accurate and cost effective than other forms of caller location.[4] However, the added value of this technology in both the EECC and in Article 106(6) of the DNA is limited by the decision to limit this technology to calls to the emergency number 112.

The limitation of Article 106(6) to communications to the emergency number 112 is inconsistent with other provisions in Article 106, which apply to all emergency communications. For example, Article 106(1) paragraph one states that emergency communications, including 112 and any national emergency number, shall be provided free of charge, while Article 106(1) paragraph two, and Article 106(2) set rules for callbacks and roaming access for all forms of emergency communications. This

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[3] Based on recent consultations with emergency services in IE, DE, LT and SE.
[4] Recital 293 of the DNA

inconsistency has no legal or technical justification and should be urgently rectified, by expanding the scope of Article 106(6) to cover all emergency communications.

(vi) Setting common EU rules on Number Independent Interpersonal Communications (NIICS)

Article 106(1) DNA sets the first EU rules on emergency communications via NIICS, empowering Member States to mandate providers of NIICS to provide access to emergency services, but only if their national PSAP system allows for routing to the most appropriate PSAP and receipt of caller location.

While the Commission's proposal to set qualitative safeguards for the use of NIICS in emergencies is welcome, the decision to allow each Member State to set its own rules on which NIICS should support access to emergency services could create confusion for people in emergencies, especially while travelling in other countries. It could also create regulatory fragmentation for NIICS providers, who would need to implement different rules for access to emergency services in each Member State.

To ensure a harmonised European approach, Article 106(8) DNA should instead allocate responsibility to the European Union to decide which NIICS should provide access to emergency services.

Furthermore, where NIICS are not mandated to provide access to emergency services, they should enable end users accessing their services on smartphones to be redirected to the device's native telephony service in order to place an emergency communication to 112.

This will avoid situations where people attempt to use a NIICS to contact emergency services and are prevented from reaching a PSAP. It may also improve effective access to emergency communications for people who rarely use number-based voice communications services and may therefore struggle to find the dialler in an emergency.

(vii) Clarifying the Digital Wallet's added value in emergencies

The European Commission's proposals to mandate access to emergency communications and public warnings using an app coupled with the EU Digital Wallet could improve public safety by improving the resilience and accessibility of 112, including while roaming. However, a lack of clarity on how this would work, its purpose, and how the European Commission will implement it risks undermining public safety in emergencies.

This lack of clarity has created significant concerns in EENA's community of emergency service professionals, with many noting that this specific proposal was unexpected, and some calling for it to be removed from the text. BEREC has also noted that a lack of clarity and consistency in this proposal could complicate the readiness of PSAPs for this wallet, and cause issues for persons wishing to make an anonymous call.

As a first step, therefore, the European Commission should provide public clarification on how this service will work, its added value, and how it will be implemented across Member States.

To ensure that this application adds real value and does not create risks for public safety, the DNA should therefore either incorporate minimum criteria to ensure that this solution provides functionally equivalent or superior access to emergency communications for citizens in emergencies to those provided over number based interpersonal communications to the European Emergency Number 112, or consider removing it from the text.

(viii) Ensuring emergency communications reach emergency services without delay.

Article 2(40) DNA notes that effective emergency communications should ensure "timely" communication between a person in an emergency and a PSAP. In practice however, when a person originates an emergency communication it can sometimes take a minute or more before reaching a PSAP due to network issues. This delay can result in people cancelling their emergency communication before it reaches a PSAP as they believe the communication failed, or if the person in an emergency stayed on the line, delay PSAPs from coming to the caller's aid.

To avoid this situation and reduce the time taken for emergency communications, the definition of effective emergency communications should be amended to require "immediate" communication between a person in an emergency and a PSAP.

(ix) Reintroducing the 112 Implementation Report and Measuring Awareness of 112

The Digital Networks Act removes the obligation for the European Commission to publish a report every two years on the implementation of the European Emergency Number 112 and accessible equivalents. This report is used by emergency services and civil society to benchmark national implementation of EU rules on emergency communications, and identify best practices in improving accessibility.

To ensure implementation and best practices can continue at a European level, the 112 Implementation Report should be reintroduced into the Digital Networks Act. To improve its value further, this report should also assess whether accessible equivalents meet the functional criteria for accessibility in Article 106(5) of the DNA.

Having a common European Emergency Number can only add value if people know they can use it if they face an emergency in another country. The most recent Eurobarometer survey found that just 50% of European citizens knew they could contact 112 if they faced an emergency in another country. Data gathered by the European Commission on this topic is relied on by emergency services and civil society organisations to understand how effective their efforts to raise awareness of the European Emergency Number are, and whether further investment to promote awareness is needed.

To ensure this data remains available, Article 106(7) of the DNA, which currently asks the European Commission to assist Member States in raising awareness of the European Emergency Number 112 should also require it to measure public awareness of emergency communications such as 112 and accessible equivalents once per year.

EENA Proposals for Public Warning

(i) Clarifying rules on access to public warning

Article 107(1) of the DNA largely replicates existing rules on public warning in Article 110 of the EECC. However, two aspects of the proposal require clarification to ensure that it does not unintentionally reduce effective access to public warning.

Firstly, while Article 107(1) obliges providers of public electronic communications networks to transmit public warnings using the technology mandated by Member States, it does not explicitly require Member States to mandate a mobile network-based public warning technology. As the existing rules on public warning in Article 110 of the EECC require Member States to implement such a technology, this omission represents a step backwards for public safety in the European Union.

While likely an oversight, Article 107 of the DNA should therefore clarify that Member States should mandate at least one mobile network-based public warning system which does not require prior user action.

Secondly, Article 107(1) could be interpreted as preventing Member States from utilising more than one public warning technology, by asking network providers to transmit public warnings using the "technology" mandated by their Member State. This contrasts with existing practice in the European Union, where Member States typically mandate additional public warning technologies such as sirens or apps in addition to a mobile network-based public warning technology. The Niinistö Report also recommended that public warning systems should utilise multiple channels.

To allow flexibility to Member States who wish to implement multi-channel public warning, references to "technology" in this article should be replaced with "technology or technologies".

(ii) Ensuring Public Warnings can instantly reach people in danger

The rise of geopolitical and climate-based disasters since 2020 has demonstrated the limitations of Location-Based SMS (LB SMS) public warning systems. Unlike Cell Broadcast, which simultaneously transmits alerts to all devices in near-real time, LB SMS systems used by public authorities contact each end user separately and can take up to a day to reach a country's full population. This has resulted in high profile public warning failures following floods in Czechia and a power outage in Portugal in 2025, when SMS alerts were unable to reach most of the population before communications networks failed.

These failures demonstrate the limitations of non-instantaneous public warning systems when responding to fast developing disasters, such as forest fires, floods, or armed conflicts. As a result of these limitations, just seven EU Member States now rely on LB SMS public warning systems, with five of these considering a transition to Cell Broadcast.

To ensure Member States can alert their populations in advance of any crisis, Article 107(1) of the DNA should establish that the public warning technology or technologies mandated by Member States should be capable of reaching their full population instantaneously.

About EENA

EENA, the European Emergency Number Association, is a Brussels-based NGO dedicated to promoting high-quality access to emergency services. EENA serves as a discussion platform for emergency services, public authorities, decision makers, researchers, associations and solution providers to improve emergency communications, public warning and civil preparedness in Europe.

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