

*Brussels, 18/05/2026
Sn Ares(2026)2151548*

Dear Mr Machado,

Thank you for your letter on the very important issue of access to emergency services during technological migration. It has served as a very useful input to the Commission proposal for a Digital Networks Act¹ where concrete measures are included to ensure the continuity of emergency communications during the migration to newer network technologies.

The proposal sets out specific obligations on safeguarding the resilience of networks and services to ensure the uninterrupted availability of emergency communication in Article 5(2). Furthermore, Article 5(3) addresses the risks that technological migration might bring about with regard to the continuity and availability of emergency communications. The provision requires that providers of public electronic communications networks, publicly available electronic communications services and public service answering points (PSAPs) take all the necessary preparatory measures, including testing and validation of solutions, to ensure the availability of emergency communication and public warning services within the Union. This provision would create the framework for the providers of networks and services to ensure by means of end-to-end testing the feasibility of emergency communications when implementing new technologies.

In addition, Article 5(4) requires providers of public electronic communications networks and of publicly available electronic communications services to inform two years in advance competent authorities and end-users on any technological change that may bear the risk of discontinuation of services on the currently used end-user devices.

Last but not least, Article 106(3) provides for a specific requirement for providers of interpersonal electronic communications services to implement technical and organisational measures to ensure effective emergency communication for their end-users whilst traveling within the Union. Effective emergency communication is defined as emergency communication that ensures timely communication between the end-user and the most appropriate PSAP, and

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¹ <https://digital-strategy.ec.europa.eu/en/library/proposal-regulation-digital-networks-act-dna>.

makes available in a timely manner contextual information, including caller location information. This ensures the correct routing of the communication together with the relevant contextual information also while roaming. In addition, the call-back information and service are to be ensured under Article 106(1) of the proposed regulation.

I believe that in this proposal we address most of the concerns raised in your letter. Meanwhile, my services will cooperate with DG GROW services to assess whether handsets still pose the risk to ensuring continuous access to emergency services.

I count on your continued collaboration with my services on this issue as your expertise in this field is absolutely essential.

Yours sincerely,

[E-signed]

Henna Virkkunen