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Results of a public consultation regarding the establishment of criteria  
for the accuracy and reliability of the information provided to locate  
the caller of the emergency number 112

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## **1. Introduction**

This contains the results of the Public Consultation regarding establishing criteria for the accuracy and reliability of the information provided information to locate the caller of the emergency number 112.

The purpose of the consultation was to enable the supply market electronic communications services and networks and all others stakeholders to express their views and comments regarding the proposed provisions.

The Public Consultation took place during the period from 14/2/2024 until 14/3/2024. The Public Consultation was attended by:

- COSMOTE
- NOVA
- VODAFONE

In the final conclusions, the positions of all are taken into account participants in the Public Consultation even those who characterized their answers as confidential, but without revealing the their identity.

## 2. Public consultation questions and answers

### 1. Do you agree with setting the accuracy and reliability criteria for mobile networks at 50m and 80% respectively?

**Point 1a:** Two providers point out that the objective of the accuracy and reliability criteria cannot be directly implemented. Given the increasing trend in active mobile device types of subscribers that support the AML function, the providers estimate that the target may be reached within 2025. It is noted that there are problems with the AML function in case of calls from the network guest devices (roaming). One provider points out that according to the EENA recommendation it may be set at a later date within an appropriate time frame to facilitate compliance by interested parties. One provider suggests that the entry into force of the criteria should be one year from the publication of the relevant decision, while a second provider suggests from 1/6/2025 and on the condition that the operating systems of the main mobile phone manufacturers will have enabled the operation by then of AML in roaming mode, otherwise the reliability criterion should be set at 70%. Another provider points out that the 80% reliability criterion is not feasible for the case of roaming calls. **EETT's response:** *EETT considers the providers' comments and proposals to be reasonable and agrees with the entry into force of the accuracy and reliability criteria of 50m and 80% respectively, approximately one year from the issuance of its relevant decision. The reliability criterion is set at 70% for the transitional period from the publication of the decision and for one year after it.*

**Point 1b:** A provider proposes to exclude calls of very short duration (e.g. less than 5 seconds) from the statistics of the annual tracking of call data to 112 related to caller identification, to avoid counting false calls, as well as including in the statistics calls in which no AML message was sent due to their very short duration. **EETT answer:** *EETT taking into account a) that calls lasting less than 5 seconds are likely to be erroneous and b) the participant's proposal, proposes that these calls be submitted as a special category, since there is a need to keep statistics on the wrong calls.*

**Point 1c:** One provider proposes to set a reliability criterion of 80% for the accuracy criteria set in the cases of SIM-free calls or with limited network access. Another provider points out that it is not possible to apply a criterion



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100% reliability for the accuracy suggested in the consultation text for calls without SIM or with limited network access. **EETT's response:**

*EETT, taking into account the agreement from the GGPP, agrees with the observation and adds the 80% reliability criterion to the relevant provision of the decision (article 2, par. 4 of the decision).*

**2. Do you agree with determining the accuracy criteria for fixed networks based on the address of the caller and in the case where an exact address is not available (such as in settlements or remote areas) based on the location coordinates of the physical termination point?**

**Point 2a:** A provider suggests adding a clarification that the address or coordinates refer to the equipment installation address agreed with the customer and stated in the contract. The provider points out that if the equipment is used in a different place than what they have declared as an installation, the provider does not guarantee the provision of the correct address in case of a call to 112, which is also included in the terms of the contract with the subscriber. **EETT answer:** *EETT considers that there is no need to add clarification since it is obvious that the address refers to the address agreed with the customer and stated in the contract, while if there are restrictions regarding the provision of caller location information, the provider must inform the subscriber.*

**Point 2b.** A provider does not agree with defining location criteria based on the location coordinates of the physical termination point because the relevant information is not available and reliable as a very small percentage of the subscriber base voluntarily grants the relevant information.

**EETT response:** *EETT agrees that position information based on coordinates is not available in all cases. For this reason, it is clarified in the provision in question that the sending of the caller's coordinates will take place as long as the relevant information is available.*

**3. Do you agree with the definition of reliability criteria for information on fixed networks is guaranteed by providers for 90% of calls?**

All providers agree with the proposed reliability criterion for the case of fixed networks.

**4. Have you identified any other problems with 112 caller identification other than those mentioned in this consultation text? What are these?**

One provider points out that the accuracy and reliability criteria apply only to fixed and mobile networks and not to satellite networks. **EETT response:** *EETT agrees with the observation. The decision issued by EETT will clearly define the type of network for which the accuracy and reliability criteria are defined.*

**5. You agree to the definition of accuracy criteria when making calls where there is no SIM or limited network access (LSS) and consequently no SMS can be sent, the geolocation accuracy as determined by the analysis of network data of the providers, is not will it exceed 3 kilometers within the urban fabric and 10 km outside the urban fabric?**

Three providers do not agree on the definition of accuracy criteria for the case of calls to 112 without a SIM or with limited network access. Due to the geomorphology of the country, it is not possible to guarantee the accuracy of 3 km inside the urban fabric and 10 km outside. They will potentially extend up to 100 km due to the extensive use of long-range cells (umbrella sites and extended cells) where their coverage extends up to 50 km for 4G technology and 100 km for 2G technology respectively. One of the providers notes that it is not possible to provide statistics on the achievement of this criterion. Two of the above providers propose for this specific case to set a reliability criterion of 80%. **EETT Response:** *EETT agrees that there may be cases where the proposed accuracy criteria are not achievable and agrees with the definition of the proposed reliability criterion at 80%.*

**6. Submission of information to EETT and the GIS**

A provider points out that there are statistics of calls to 112 in the GPPP. GPP also has the matching of call with AML-SMS, when it exists, which the providers do not have, as the call and the SMS are routed – and then their details are stored – in separate systems, while for the providers the matching is difficult process. The provider proposes that the annual submission of data be made by the GPP to EETT. In the event that the provision for the submission of data by providers is included in the final text, the provider proposes



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this should be done in April or May of each year and be exempted from this obligation in the first half of 2024.

**EETT's answer:** *Regardless of the existence of data from the GGPP, EETT considers it necessary to provide data from the providers as well for better supervision of the provisions of the proposed decision. EETT agrees that data collection should start from the second half of 2024, as well as for the data submission time that it may not be done at the beginning of the year.*