

## Public Consultation on draft BEREC Report on equivalent access and choice for disabled end-users – BOR (15) 135

### 1. Do you have details of initiatives which you consider to be best practices in promoting equivalent access and choice for disabled end-users of electronic communication services? Please describe and explain their relevance and impact on disabled end-users.

Article 26.4 of the Universal Service Directive has contributed to the improvement of emergency services accessibility for disabled end-users.

The initiatives below, categorised by tool providing access to emergency services, should work as best practices and lessons learned. Depending on the type of disability, the following list (by no means exhaustive) will impact disabled end-users by allowing them to contact emergency services in case of an emergency. Please note that the following items are not mutually exclusive and can overlap in terms of functions. EENA Members agreed that accessibility can be improved if several communications channels are available (e.g. SMS and Total Conversation; SMS and Emergency Apps) (see [here](#))

1. Access to 112 via SMS should be mandatory: European Authorities should provide clear and mandatory regulation on the use of emergency SMS, including accessibility of 112 using eSMS. 18 European Countries have implemented emergency SMS, and other Member States should do so too. For the specific characteristics of each project, please click go to [page 11 of EENA's 'SMS access to 112' document](#).
2. Emergency apps should be encouraged and standardised: Apps can provide the option of chat and/or video communication with 112, the use of sign language, accurate location and text. For best practices about emergency apps providing equal access to emergency services for disabled people, please view EENA's [112 Smartphone Apps](#) and [112 Apps Strategy](#) documents.
3. Total Conversation should be encouraged: Total Conversation is an extension of the voice telephony concept by adding the video and real-time text media. An initiative offering best practices is the European project [REACH112](#). Article 26.4 refers to standards which should be listed, including the standards on Total Conversation done by ETSI.
4. Relay services should be used for emergency communications where they exist: An important part of accessible telecommunications; when two parties don't 'speak' the same language, a human interpreter can provide a translation service; different communication modes; text relay (email, SMS, real time text), video relay (sign-language, lip-reading). Initiatives offering insight into this can be found (among others) in:
  - CNR114 France: Total Conversation roll-out planned for the end of 2015, beginning of 2016
  - Sweden: For real time texts, the text relay is open for standard sip calls, but with no specific address for emergencies. In Sweden the video relay service has opened a prioritised access address for emergency times.
  - The Netherlands: Direct accessibility for real time texts is realised; sign-language support has been outsourced to a relay service.
  - Norway: The video relay service can connect emergency calls and use text and sign language, but it is open only 8 to 20 Monday to Friday. An emergency sign language interpreter service is in planning and may be started early 2016, but not yet confirmed.
  - Germany: Germany has a well-documented way for 112 and 110 access for sign language and text through relay services (MO-SU from 8h to 23h).

**2. In your opinion, what actions or measures, if any, should be considered by NRAs, governments, public bodies, consumer associations, disability associations, equipment manufacturers, network operators, electronic communications service providers and the European Commission to improve equivalence of access and choice, for example, under the provisions of the Universal Service Directive?**

According to the article 26.4 of the Universal Service Directive revised in 2009, Member States are invited to “ensure that access for disabled end users to emergency services is equivalent to that enjoyed by other end users”. Recital 41 of the Universal Service Directive says that “Member States should take specific measures to ensure that emergency services, including “112”, are equally accessible to disabled end-users, in particular deaf, hearing-impaired, speech-impaired and deafblind users. This could involve the provision of special terminal devices for hearing-impaired users, text relay services, or other specific equipment.”

1. Implementing measures of the article 26.4 of the Universal Service Directive on emergency services accessibility should be established using article 26.7 which enables the Commission to do so
2. Standards related to article 26.4 should effectively be listed
3. When upgrading Public Safety Answering Points (PSAPs), national authorities should ensure that the deployments are in line with Next Generation standards and therefore Total Conversation requirements
4. European Authorities should mandate access to 112 via text (SMS) all over the EU (free of charge)
5. European Authorities should request that 112 SMSs function when roaming, and caller location should be provided
6. When upgrading Public Safety Answering Points (PSAPs), national authorities should ensure that the deployments are in line with Next Generation standards and therefore Total Conversation requirements
7. European Institutions should ensure that a set of standards, as well as regulation for accessible communication and accessible emergency service calling, applies on terminal manufacturers and mobile network operators
8. Next Generation 112 standards and regulation on emergency calling should be proposed at EU level along with a test of the entire Next Generation emergency calling chain. ETSI is now starting [NG112 PlugTests](#)
9. Governments and NRAs should ensure that relay services, where they exist, are also used for emergency services
10. Emergency Apps should be encouraged but standardised (see the work of EENA on [112 Apps](#) and ETSI EMTL)
11. BEREC and European Authorities should look into access to 112 from OTT-1 type of service, in addition to OTT-0 type of service (see EENA’s response to BEREC’s consultation on OTTs)

### **About EENA**

EENA, the European Emergency Number Association, is a Brussels-based NGO set up in 1999 dedicated to promoting high-quality emergency services reached by the number 112 throughout the EU. EENA serves as a discussion platform for emergency services, public authorities, decision makers, researchers, associations and solution providers with a view to improving the emergency response in accordance with citizens' requirements. EENA is also promoting the establishment of an efficient system for alerting citizens about imminent or developing emergencies.

The EENA memberships include more than 1100 emergency services representatives from over 80 countries world-wide, 75 solution providers, 15 international associations/organisations, more than 180 Members of the European Parliament and 90 researchers.

EENA is a registered organisation in the official [EU transparency register](#) and we deeply believe that the transparency register should be mandatory rather than optional.