

15 November 2022

## **Position Paper on the delegated regulation supplementing Directive (EU) 2018/1972 of the European Parliament and of the Council with measures to ensure effective access to emergency services through emergency communications to the single European emergency number '112'**

Article 109(8) of the [European Electronic Communications Code](#) (EECC) gives the European Commission the power to "adopt delegated acts [...] on the measures necessary to ensure the compatibility, interoperability, quality, reliability and continuity of emergency communications in the Union with regard to caller location information solutions, access for end-users with disabilities and routing to the most appropriate PSAP". The first delegated act must be adopted by 21 December 2022. On 08 August 2022, the European Commission [published](#) a draft delegated regulation supplementing EECC Article 109 with measures to ensure effective access to emergency services through emergency communications to the single European emergency number '112'. Article 3 of the draft delegated regulation sets out parameters that need to be taken into account by the competent regulatory authorities when setting the criteria for the accuracy and reliability of caller location information.

The signatories of this position paper would like to express their concern over each Member State defining their own criteria without any coordination at the European level. While the technologies used to establish and transmit caller location information are similar in all Member States, potentially having 27 different sets of criteria would result in diverging regulatory requirements across the EU. This scenario would not be in the interest of EU citizens whose personal safety might be better protected in one Member State when compared to another. It would also add complexity for solutions providers and impact the overall effectiveness of emergency communications in the EU. EENA expressed this concern in its [submission](#) to the draft delegated regulation and similar concerns were raised in their respective submissions by [Apple](#), [ETNO](#), [Google](#) and [STS Romania](#).

We also note the [publication](#) of BEREC's opinion on the draft delegated regulation on 14 October 2022. In its opinion, BEREC states that measures adopted by the European Commission on caller location information should aim for better availability and accuracy and should seek greater harmonisation at the EU level.

To that end, the signatories hereunder call on the relevant European institutions to strive for a harmonised approach between the different Member States when laying down accuracy and reliability criteria for emergency caller location information. This could be achieved by defining a minimum threshold through coordination at a European level. This work could be led by BEREC, or any other competent EU body, to define guidelines that each Member State could take into account when laying down criteria at the national level.

Article 8 of the draft delegated regulation requires Member States to report to the Commission on the aforementioned accuracy and reliability criteria within one year of the regulation entering into force. Therefore, the need for European coordination on this matter requires urgent attention. The signatories to this position paper are available to participate in any initiatives aimed at furthering this important objective.

Signed:

- **Emergency Response Centre** (112 emergency call answering service, Lithuania)
- **Neyðarlínan ohf** (112 emergency call answering service, Iceland)
- **Special Telecommunications Service** (112 emergency call answering service, Romania)
- **SOS Alarm** (112 emergency call answering service, Sweden)
- **Secretaria-Geral da Administração Interna** (Government Ministry responsible for 112 emergency call answering service, Portugal)
- **Fachverband Leitstellen** (Association of 112 public safety answering points, Germany)
- **Directorate 112, General Directorate - Civil Security** (State entity responsible for 112 emergency call answering service, Belgium)
- **CSU 112** (National 112 centre, Luxembourg)
- **Emergency Call Answering Service (ECAS)/BT Ireland** (112 emergency call answering service, Ireland)
- **Emergency Response Centre Agency** (112 emergency call answering service, Finland)
- **Ministry of Justice and Security, Ministry of Economic Affairs and Climate and the Dutch 112 PSAP Collaboration** (Government Ministries and National Police responsible for 112 emergency call answering service, The Netherlands)
- **Norwegian Police** (112 emergency call answering service, Norway)
- **NOTRUF NÖ** (114 emergency medical service, Lower Austria)
- **European Emergency Number Association (EENA)**
- **Asociatia Societatea de Salvare Bucuresti** (Romania)
- **Google**
- **European Telecommunications Network Operators' Association (ETNO)**
- **Security Pitch Ltd**
- **Henning Schmidt pott** (Germany)
- **CSV Antonio Luca** (Italy)
- **Steven Vermeulen** (Belgium)
- **Fabrizio Giusti** (Italy)
- **Baiba Petrova** (Latvia)
- **Demetrios Pyrros** (Greece)
- **Stiliyan G. Velchev** (Bulgaria)
- **Jannik Havegård Larsen** (Denmark)
- **Shane Dillon** (Ireland)
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- **Neal Richardson** (New Zealand)
- **Tadas Marošćikas** (Lithuania)
- **Dara Mulhern** (Ireland)