EENA RESPONSE TO THE ECC CONSULTATION AND DRAFT REPORT 225
"Establishing Criteria for the Accuracy and Reliability of Caller Location Information in support of Emergency Services."

Brussels, September 2014

This paper has been prepared by the European Emergency Number Association. It contains the high-level position of EENA in relation to the above draft Report.

General comments

In general, EENA very much welcomes this draft Report and would like to recognise the work of the PT ES group and specifically the drafters and editors. It is quite obvious, and it has been alluded to in this Report, that the current level of caller location information provided to the emergency service organisations is sub-standard. EENA supports the view expressed that A-GNSS should be implemented and should be done so as soon as possible. EENA remains available to assist whenever necessary.

1. A-GNSS

In welcoming the draft Report, EENA would like to extend support to and highlight one of the major conclusions, which is that "*A-GNSS should be implemented as a caller location technique in addition to the existing network based methods*". This step forward is very welcome and is a clear endorsement of the capabilities and positive impact that A-GNSS can bring to the provision of meaningful and impactful location information of emergency calls. To that end, EENA would like to see clear next steps toward this implementation in the Final Report.

> Point 1: EENA welcomes the conclusion that A-GNSS should be implemented as a caller location technique and calls on ECC/CEPT to outline the next steps in order to to expedite its inclusion within the relevant regulatory and technical frameworks.

2. Statistics

The conclusions as presented appear to place considerable emphasis on the requirement to have "*statistical background material*" produced before accuracy and reliability targets can be set. The rationale for this appears to be that the targets should be "*reasonable and proportionate to the level of investment required*". However, EENA is somewhat puzzled by the level of emphasis on the requirement for statistics as it appears to be a barrier to progress and is part of a circular or "chicken and egg" argument (i.e. no statistics then no improvement and no improvement then no statistics).

By way of example, in the Executive Summary it states "*Mandating accuracy and reliability requirements and target values on electronic communications service providers is possible* **as soon as** *statistical background material has been produced*" whilst in section 4.3.2 it states " *Thus, there is a need to improve the current accuracy of the location information* **before** *starting the collection of evidence of the quality of the location information received by the PSAP*". (EENA emphasis)

EENA doubts that statistics are actually needed to the extent that the Report outlines but even if this were the case, the precise list of statistics that the ECC feels is required should be clearly listed in full. The CEPT members presumably would be able to obtain the data needed. EENA suggests that in the Final Report, the statistics with clear definitions and formulae should be listed to avoid ambiguity, and without them would lead to confusion and inconsistent/incomparable data.

> Point 2: EENA calls on ECC/CEPT to clearly outline what precise statistics/data (with definitions and formulae) it believes are needed as soon as possible and list the next steps to collect them.

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3. Other additional points

- **Absence of a country-specific or pan EU approach:** Within the context of the overall approach, there appears to be an absence of policy direction whether there should be a **minimum** pan-European target set or whether each Member State should set its own national targets. In EENA's view, it would be advantageous to have a pan-European target rather than have country-specific targets. It would provide regulatory certainty for the network operators (particularly the mobile network operators) and make for a harmonised and consistent EU approach.

- **PSAP upgrade and training:** The draft Report makes mention of the need for PSAP upgrades in order to accept any enhanced caller location information in the future. This may be true in some cases but any cost is likely to be incremental and should not be seen as a barrier to progress. In addition many PSAPs are investing in new technologies currently in preparation for eCall and this could be a mutually beneficial outcome.

- **The identification of the "Competent Regulatory Authority":** EENA is somewhat disappointed that the issue of responsibility and ownership for the setting of accuracy and responsibility has not been addressed. The draft Report in section 7.6.6 mentions the role of the "Competent Regulatory Authority" but it is not clear who they are and the Questionnaire could have been used for this purpose. Whilst recognising it is predominantly a technical report, it would have been useful to identify what agency/body is responsible for setting the targets for each EU Member State.

- **Different position methodologies (mobile):** EENA recognises the excellent analysis done in chapter 7 on the various positioning methodologies and standards available currently. EENA would point out however, it should be up to each presenting network to decide which methodology to deliver the location information based on the prevailing conditions of its own network in order to meet whatever target is set. Prescribing and mandating which methodology is to be used may be disproportionate and unreasonable. To that end, EENA would like to highlight one point in this section and ask for further clarification when it states that "*Based on the mentioned statistics, different target values for different implementation scenarios may be envisaged*". Does this mean that CEPT is advocating that different methodologies have different targets?

- **Implementation costs:** In section 7.6.4 the table outlines the cost elements associated with the different methodologies and in table 5 there is an evaluation of the positioning technologies based on reliability, response time, costs and the need for handset support or not. Also in annex 5 (Questionnaire) there are upgrade cost estimations provided by the respondents. Given the level of data now available, EENA would encourage the ECC to conduct a thorough and expeditious regulatory impact assessment / cost-benefit analysis on the implementation of enhanced caller location information.

- **Location information from Corporate networks (fixed):** EENA welcomes the recognition of this issue in the draft Report (Sections 6.4.3 and 6.6). EENA would recommend that this issue also be addressed so that the relevant Competent Regulatory Authorities can address and resolve the issue. Technologies currently exist to overcome the challenges.

Conclusion

EENA welcomes this initiative by the ECC and is encouraged to see this step forward being taken. A-GNSS is an available technology that should be utilised and which would be impactful for the emergency services and citizens alike.

EENA asbl
Avenue de la Toison d'Or, 79 - 1060 Brussels - Belgium
Tel: +32 (0)2 53 49 789
info@eena.org - www.eena.org

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