

Joint position paper from Microsoft, Google and the European Emergency Number Association

This position paper sets out the joint view of Microsoft, Google and the European Emergency Number Association (EENA) on access to emergency services from over-the-top players (OTTs) in the proposal for a European Electronic Communications Code (EECC).

Main points:

The signatories of this paper welcome the proposal but would like to highlight some points necessary to understand the mandate on OTTs to provide access to emergency services:

- Access to 112 from OTTs represents today a very minor percentage of emergency calls. When it comes to access to emergency services, stronger attention should be given to higher priorities, such as improving the accuracy of caller location for calls originating from mobile phones.
- A mandate on access to 112 from OTTs can be implemented only if there is one single end-point in each Member State. This would imply important changes in the organisation of many countries in the way they handle emergency calls.
- Reliability of calls to 112 should be guaranteed in order to make sure that calls to emergency services will go through.
- There should be clear exemptions for services for which these obligations are simply not practical or relevant (e.g. emails).

Background

Since the release of the proposal for a European Electronic Communications Code (EECC), much attention has been given to the issue of access to 112 from over-the-top players (OTTs). If the services that the EECC would classify as number-based interpersonal communications services generally should already provide access to emergency services since the 2009 Universal Service Directive, this proposal suggests the extension of this obligation to number-independent interpersonal communications services in case of "appreciable threat".

A very small percentage of emergency calls concerned

We welcome the efforts of the European Commission to propose a legislation that is future-proof. However, we regret that the debates are centred around this issue and not the real priorities. For instance, Skype Out already provides access to 112 and 999 in the United Kingdom (along with Denmark and Finland) but this only accounts for around 0,01% of the total number of emergency calls. On the contrary, 70% of emergency calls originate from mobile phones and a stronger attention should be given to improving the caller location information of these calls. In this context, we support the inclusion of a mandate on the use of handset-based location information in the EECC proposal as a far higher priority than OTT requirements.

Technical limitations to such a mandate

To provide access to emergency services under current arrangements, OTTs need a single end-point in each country. Indeed, an OTT cannot correctly route the call in the countries having several Public Safety Answering Points (PSAPs). This has led to problems when implementing the 2009 Universal Service Directive. In the countries having only 1 PSAP, such as the United Kingdom, Finland and Denmark, Skype Out already provides access to emergency services. However, providing access in other Member States would require a reorganisation of the process of handling emergency calls and the establishment of a 'one-stop-shop' for calls to 112 in each country. In other words, the provisions in the proposal can be implemented only if there is one single end-point to route the call.

Guaranteeing the reliability of the call

We acknowledge the need for a future-proof legislation. However, we would like to remind that the quality and reliability of a call to emergency services should above all be ensured. People in need of emergency assistance should not be encouraged to use unreliable methods of attempting to reach first responders. Today, OTTs do not have control over the network and network operators do not have control over the call from an OTT. The responsibility of each stakeholder should therefore be further defined.

Bringing more clarity on the scope of the services covered

Finally, it should be made clear that some services cannot be covered by the extension to potentially “all interpersonal communications services” where it is not relevant or practical, such as placing emergency calling functionality on emails. In this regard, it should be kept in mind that the legislation should remain proportional and not stifle innovation, while at the same time not compromising the safety of citizens.

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 1300 emergency services representatives from over 80 countries world-wide, 90 solution providers, 14 mobile operators, 15 international associations/organisations, more than 200 Members of the European Parliament and 100 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.

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About Microsoft

Microsoft (Nasdaq "MSFT" @microsoft) is the leading platform and productivity company for the mobile-first, cloud-first world, and its mission is to empower every person and every organization on the planet to achieve more.

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About Google

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