

European Disability Forum's Recommendations for equal access and choice to electronic communications services

The [European Electronic Communications Code](#) (EECC or the Code) is an [EU Directive](#) which aims to coordinate EU national laws on electronic communications networks and services. One of its goals is to ensure the provision of good quality, affordable, publicly available and accessible electronic communication services to persons with disabilities. It covers:

- Internet access services
- Interpersonal communications services (e.g. telephone, Skype calls, WhatsApp, email)
- The single European emergency number '112'
- Universal services that must be ensured by EU countries

Governments have **until 21 December 2020 to adapt their national laws to comply with the Code**. This document contains recommendations to national authorities, services and organisations of persons with disabilities for successful implementation of the EECC. We encourage disability advocates involved in national transposition to complement this document with the below-linked EDF toolkit on transposition of the EECC, as it provides a broader overview and further recommendations to advance accessibility through national rules. In this text, articles of the EECC will be referenced between brackets. Example: Article 6 = [6]

Contact your [national regulatory authorities](#) to see which ministry or ministries are overseeing the process. They must ensure accessibility of electronic communications services supported by financial and human resourcing, technical and legal expertise on accessibility, and awareness on disability-rights issues [5 and 9].

To ensure availability, affordability and accessibility of communications services:

- Electronic communication services must comply with the accessibility requirements of the [European Accessibility Act \(Annex I\)](#) and its forthcoming standards [111]
- Until the EECC and the European Accessibility Act related standards are developed, service providers should comply with the [Harmonised European Standard on Accessibility of ICT products and services \(EN301 549 version 3.1.1\)](#)
- The following services must be available [85] and fully interoperable [111] with an adequate level of quality [104] (See [BEREC Guidelines detailing Quality of Service Parameters](#)) including for emergency numbers [109]:
 - **Total conversation services:** Real time conversation service that allows simultaneous video, voice and real-time text service in telecommunications. It enables people in two or more locations to: see, hear, and/or text in real time.

- **Real-time text (RTT):** Text transmitted instantly as it is typed or created. Recipients can read the text as it is being written. This can be done between two or more end-users.
- **Relay services** (text relay services, and video relay services) are available at all times [85 and 111], including for emergency services [109]. These are services which enable two-way communication between remote end-users who prefer or require different modes of communication (e.g. sign language, speech) by providing conversion between those modes of communication, normally by a human operator that works as intermediary between users. A deaf person calling their doctor can make use of a video relay service to communicate with a sign language interpreter that will call the doctor on their behalf.
- Terminal equipment such as smartphones must be accessible according to the European Accessibility Act. Until its standards are ready, manufacturers can follow the [Harmonised European Standard on Accessibility of ICT products and services \(EN301549 version 3.1.1\)](#) [85]
- Specific terminal equipment such as augmentative and alternative communication devices or other assistive technologies must be available to persons with disabilities [85]
- Cost of communication for persons with disabilities must not increase due to provision of real-time-text, total conversation services, or relay services [85]
- Special tariffs for persons with disabilities should also be applied [85]
- Availability and affordability (for example through special tariffs) of services must also be ensured to organisations of persons with disabilities as they employ many persons with disabilities [85].

To ensure accessible emergency communications and public warnings:

- Public Safety Answering Points (PSAP) (calling centres that handle emergency calls) for the single European emergency number '112' must comply with the accessibility and interoperability requirements of the European Accessibility Act for Public Safety Answering Points, responding to emergency calls by real-time text and total conversation services [109]. Missing children (116000) and child helpline (116111) hotlines [96] and national emergency numbers should use the same requirements
- Public warning systems and emergency information must be accessible through more than one sensory channel (for example text **and** audio) and easy to understand (not exceeding level of complexity superior to level B1 of the [Council of Europe's Common European Framework of Reference for Languages](#)) [110]
- Advanced Mobile Location (AML) systems for calls and text to the single European emergency number '112' and national emergency numbers must be deployed

effectively and without undue delays [109]. This is a technology that allows locating the person making the emergency call or sending the emergency text by identifying the location of the device they used for emergency communication.

- Next Generation '112' must be deployed to enable high quality accessible emergency communication using real-time-text and total conversation services over internet protocol [109].

See [EDF toolkit on transposition of the European Electronic Communications Code](#) for more comprehensive information and list of recommendations for national advocacy.

Reference documents

- [Full text of the European Electronic Communications Code is available in all official EU languages](#)
- [Full text of the European Accessibility Act is available in all official EU languages](#)

About the European Disability Forum (EDF)

The European Disability Forum (EDF) is an umbrella organisation of persons with disabilities that defends the interests of over 100 million persons with disabilities in the EU. It is a unique platform run by persons with disabilities and their families, and is a strong, united voice of persons with disabilities advocating for the implementation of the UN Convention on the Rights of Persons with Disabilities (UN CRPD) in the EU.

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