



EDF feedback to European Commission Roadmap consultation for ensuring effective access to emergency services in the Union through emergency communications to the single European emergency number '112'

Deadline: 29 October 2021

Link to roadmap consultation: https://ec.europa.eu/info/law/better-regulation/have-your-say/initiatives/13183-Emergency-communications-improving-access-through-the-single-European-emergency-number-%E2%80%98112%E2%80%99_en

Submitted by Mher Hakobyan, EDF Accessibility Officer

Who we are

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

Context and Problem

The European Commission is mandated to adopt a delegated act to ensure effective access to emergency services through emergency communications to the single European emergency number '112' under Article 109(8) of [Directive 2018/1972 – the European Electronic Communications Code \(EECC\)](#).¹

One of the aims of the delegated act will be to introduce measures necessary to ensure the compatibility, interoperability, quality, reliability and continuity of emergency communications in the Union with regard to equivalent access for end-users with disabilities to emergency services in their country of residence and when travelling within the Union.²

¹ Directive 2018/1972 Article 109(8) reads "In order to ensure effective access to emergency services through emergency communications to the single European emergency number '112' in the Member States, the Commission shall, after consulting BEREC, adopt delegated acts in accordance with Article 117 supplementing paragraphs 2, 5 and 6 of this Article 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 such delegated act shall be adopted by 21 December 2022."

² Directive 2018/1972 Article 109(5): "Member States shall ensure that access for end-users with disabilities to emergency services is available through emergency communications and is equivalent to that enjoyed by other end-users, in accordance with Union law harmonising accessibility requirements for products and services. The Commission and the national regulatory or other competent authorities shall take appropriate measures to



In order to comply with the requirement of providing equivalent access for persons with disabilities to emergency services, Member States must effectively transpose and implement the [European Accessibility Act \(EAA\)](#), as it sets harmonised accessibility requirements for electronic communications services, related products, and answering of emergency communications to the single European emergency number “112” by the most appropriate Public Safety Answering Points (PSAPs) which will receive and handle emergency communications. The Act requires that by 28 June 2027 PSAPs in all Member States use the same communication means as received, namely by using synchronised voice and text (including real time text), or, where video is provided, voice, text (including real time text) and video synchronised as total conversation.

In the meantime, equivalent access for persons with disabilities to emergency communications across the Union is not ensured, especially during roaming. This is evidenced by [infringement proceedings initiated by the European Commission in July 2019 against Czechia, Germany and Spain for lack of equivalent access for end-users with disabilities](#) and [December 2020 Report of the European Commission on the effectiveness of the implementation of the single European emergency number '112'](#).

EDF reaction³ to specific aims and proposed solutions by the Roadmap

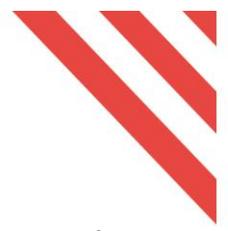
EDF welcomes the opportunity to give feedback to the roadmap consultation ahead of the publication of the draft delegated act. We also welcome the aims and some of the proposed solutions detailed in the roadmap aiming to ensure fully equivalent access for persons with disabilities to emergency communications.

We agree that individuals benefit from effective access to emergency services.

- In order to ensure effective access to everyone, including all persons with disabilities, it is important that Member States have a harmonised approach to emergency communications so persons with disabilities, in particular deaf, hard of hearing, speech-impaired and deaf-blind persons, can contact the single European emergency number ‘112’ on equal basis with others in their countries or when travelling within the EU. This can only be achieved if Member States and electronic communications operators comply with the same accessibility and interoperability requirements when it comes to emergency communication, namely using real-time text and total

ensure that, whilst travelling in another Member State, end-users with disabilities can access emergency services on an equivalent basis with other end-users, where feasible without any pre-registration. Those measures shall seek to ensure interoperability across Member States and shall be based, to the greatest extent possible, on European standards or specifications laid down in accordance with Article 39. Such measures shall not prevent Member States from adopting additional requirements in order to pursue the objectives set out in this Article.”

³ EDF reactions are detailed in bullet points after short introduction of the specific initiative suggested by the Roadmap.



conversation services as required by the European Accessibility Act. It is important that these technologies are interoperable with any assistive technologies used by the person contacting the emergency number. Interoperability with relay services is also crucial, as well as ensuring effective caller location when using a relay service, which might be more difficult in countries with larger territory. Other means of access, such as dedicated apps, can be additional and/or temporary measures in discussion with national organisations of persons with disabilities but PSAPs should be able to communicate using real-time-text and total conversation technologies.

The Roadmap notes that 4G/5G networks will make possible the deployment of real time text coupled with video, also called total conversation, which allows for swifter communications with the public safety answering point (PSAP), especially for persons with disabilities.

- We highlight that these should become the mainstream way of communicating as voice calls and SMS are now.

The roadmap also noted that use of new technologies for accurate and reliable caller location should be available both in domestic and cross border (roaming) context.

- Caller location can be more difficult if the call is being made via a relay service, especially in larger countries where the location of the relay service might be far from the PSAP and person making the call. This is a challenge that must be addressed.

The roadmap further states that use of emergency applications that provide richer data to the emergency services can make the emergency relief action more effective.

- Again, we highlight mainstream and interoperable total conversation and real-time text services would ensure most effective access for persons with disabilities.
- We also agree that minimum quality and interoperability standards are necessary to ensure that everyone, including persons with disabilities, can benefit from high quality, accessible and effective emergency communications at home and while travelling and using roaming services.

The Roadmap also notes that the delegated act “could explain the functional equivalence requirements for the means of access available for persons with disabilities, in particular those that are not able to engage in a voice communication and place a call to 112”.

- The European Accessibility Act already provides “Specific accessibility requirements related to the answering of emergency communications to the single European emergency number ‘112’ by the most appropriate PSAP” in Annex I, Section V. In addition, a harmonised standard for the accessibility and interoperability of emergency communications and for the answering of emergency communications by the PSAPs



(including to the single European Emergency number 112) for the Accessibility Act is foreseen. Therefore, in case functional equivalence requirements are drafted in the delegated act, consistency with the requirements of the European Accessibility Act and planned harmonised standard must be ensured.

The roadmap also suggests the possibility of introducing reporting obligations for the Member States to improve the monitoring of the implementation of the provisions of the EU law on emergency communications and to help establish best practices. It foresees that reporting obligations would ensure the availability of a public database on means of access to emergency services that would enhance the awareness of alternative means of access (Member States could be required to report the means of access deployed for persons with disabilities and indicate the webpage where the means of access, registration, download and use is described).

- First and foremost, reporting should address the effective deployment of total conversation and real-time text services by Member States.
- We highlight that reporting obligations should ensure involvement of national organisations of persons with disabilities with diverse disability representation and access needs, so that the reports reflect the lived experience of accessing emergency services by persons with disabilities.
- In relation to the proposed public database, it should meet the accessibility requirements of the European Accessibility Act to ensure accessibility for persons with disabilities. It should also provide information in minority languages, including in national sign languages, as well as in easy to read format.
- It is equally crucial that emergency information, including information on contact and means of access, is easy to find. Therefore, there should also be awareness-raising obligations on Member States and European Commission, so that persons with disabilities are aware of this resource. This is especially important during cross-border travel. To ensure that persons with disabilities are aware and can easily find information about available means of access to emergency communications at home and when travelling, it is advisable to have a single database (website⁴, or app) for the whole Union which includes information about accessing emergency services in each Member State. In addition, Member State can have their own public databases, if this is useful for potential users of emergency services, including residents with disabilities in a particular country.

The roadmap also suggests setting common minimum requirements to ensure equivalent access to emergency services for persons with disabilities throughout the EU.

- We support this suggestion, and again note the importance of consistency with the foreseen harmonised standard for the accessibility and interoperability of emergency

⁴ Or at least have the same URL name for all national websites for this purpose.



communications and for the answering of emergency communications by the PSAPs (including to the single European Emergency number 112) for the Accessibility Act.

- Setting minimum quality requirements is especially important to enable mainstream and interoperable use of total conversation and real-time text technologies for communicating with emergency services both at home and while roaming.

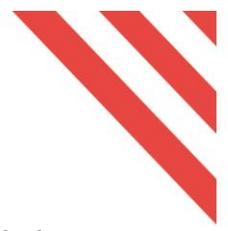
The roadmap mentions the possibility of mandating the implementation of Pan-European Mobile Emergency App specifications to enable a single platform communication for roaming persons, in particular, persons with disabilities to the extent added value may be proved to the persons.

- We think the suggested App specifications, consistent with relevant accessibility requirements of the European Accessibility Act with implementation of relevant harmonised standards for the Act, can bring added value to persons with disabilities, especially for accessing emergency services during cross-border travel. Again, it must be consistent with planned standard for accessibility and interoperability of emergency communications and for the answering of emergency communications by the PSAPs (including to the single European Emergency number 112) in support of the Accessibility Act.
- As noted, the app is a good additional measure to ensure access to emergency services, but the goal should be mainstream use of interoperable total conversation and real-time text technologies by PSAPs across the EU. This is a legal requirement under the European Accessibility Act that must be met 28 June 2027, the latest.

Recommendations:

Based on the above reaction points, and our earlier positions on the European Electronic Communications Code, European Accessibility Act, and the draft recast Roaming Regulation, we share our recommendations that would support the effective implementation of the aims of article 109 of the European Electronic Communication Code and the delegated act:

- **Effective access to emergency services for everyone:** Member States with support of the European Union should ensure a harmonised approach to emergency communications so every person, including persons with disabilities, in particular deaf, hard of hearing, speech-impaired and deaf-blind persons, can contact the single European emergency number '112' on equal basis with others in their countries or when travelling within the EU. This can only be achieved if electronic communications operators and PSAPs comply with the same accessibility and interoperability requirements when it comes to emergency communication, ensuring real-time text and total conversation services. It is important that these technologies are interoperable with any assistive technologies used by the person contacting the emergency number. Interoperability with relay services is also crucial, as well as ensuring effective caller location when using relay services. Administrative barriers, such as requirement of pre-



registration should be removed. Emergency communication should be possible in minority languages, including national sign languages. Relay services should be available 24/7 to persons with disabilities who need this intermediary service for accessing emergency services.

- **Effective transposition and implementation of the EAA:** Member States should effectively transpose the European Accessibility Act, and shorten deadlines for implementation of accessibility requirements for answering to the single European emergency number ‘112’ by PSAPs.
- **Apply accessibility requirements to all emergency and crucial numbers:** Member States should further apply above requirements to answering of calls to national emergency numbers, and other crucial numbers such as missing children and child helpline hotlines, domestic violence, suicide hotlines, COVID-19 and other public health and other emergency information contacts, and passenger assistance services.
- **Ensure effective standardisation:** European Standardisation Organisations should develop by the time of application of the European Accessibility Act, the harmonised standards in support of the Act, including on accessibility of emergency communications and answering emergency communications (including to the single European emergency number 112) describing the technical solutions for accessibility and interoperability to ensure conformity with the requirements set in Annex I of the Act.
- **Consider that accessible communications services and devices are crucial:** Transposition and standardisation for the Act is also important for ensuring that persons with disabilities have equal access to consumer terminal equipment such as smartphones or tablets with calling capabilities, which they can use to access emergency communications. Affordability of mobile and internet services is another important aspect.
- **Quality standards and free of charge access services throughout the Union:** Member States and the EU should ensure same quality of mobile services and seamless and free of charge access to emergency services through total conversation and real-time text at home and abroad.
- **Meaningfully involve organisations of person with disabilities and accessibility experts:** Organisations of persons with disabilities representing wide diversity of persons and access needs, as well as accessibility experts, should be consulted and enabled to be involved in the development and implementation of European and national policies for ensuring equal access to emergency communications, including in transposition and implementation of the European Accessibility Act; standardisation for the Act; when drawing up national roadmaps to provide for the necessary technical upgrades to ensure the seamless functioning of emergency communications; monitoring and reporting related to implementation of Article 109 of the Communications Code.



EDF publications

- [EDF Recommendations for equal access and choice to electronic communications services](#)
- [EDF toolkit for transposition of the European Electronic Communications Code \(EECC\)](#)
- [EDF toolkit on transposition of the European Accessibility Act \(EAA\)](#)
- [EDF position on the European Commission's draft standardisation for the European Accessibility Act \(EAA\)](#)
- [EDF recommendations on the recast Roaming Regulation](#)

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