



# The European Accessibility Act – Perspectives from Telecom Operators

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# European Accessibility Act (EAA)

## *Timeline & progress so far*

- European Accessibility Act's main goal → improving functioning of internal market for accessible products & services
- Applies to products & services including telephony services & related equipment
- Entry into force on **June 27, 2019**
- Deadline for MS transposition on **June 28, 2022**
- Deadline of **June 28, 2025** for MS to apply measures

# European Accessibility Act – where do ECSPs play a role?



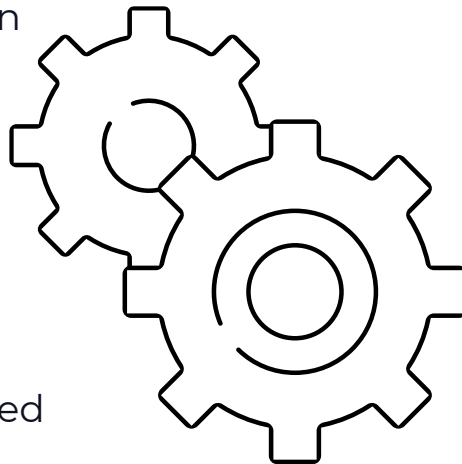
Provide information on products in an accessible way



Real-time text



Total conversation  
(where video is provided in addition to voice)



Emergency communications using voice & text should be synchronized and transmitted to the most appropriate PSAP

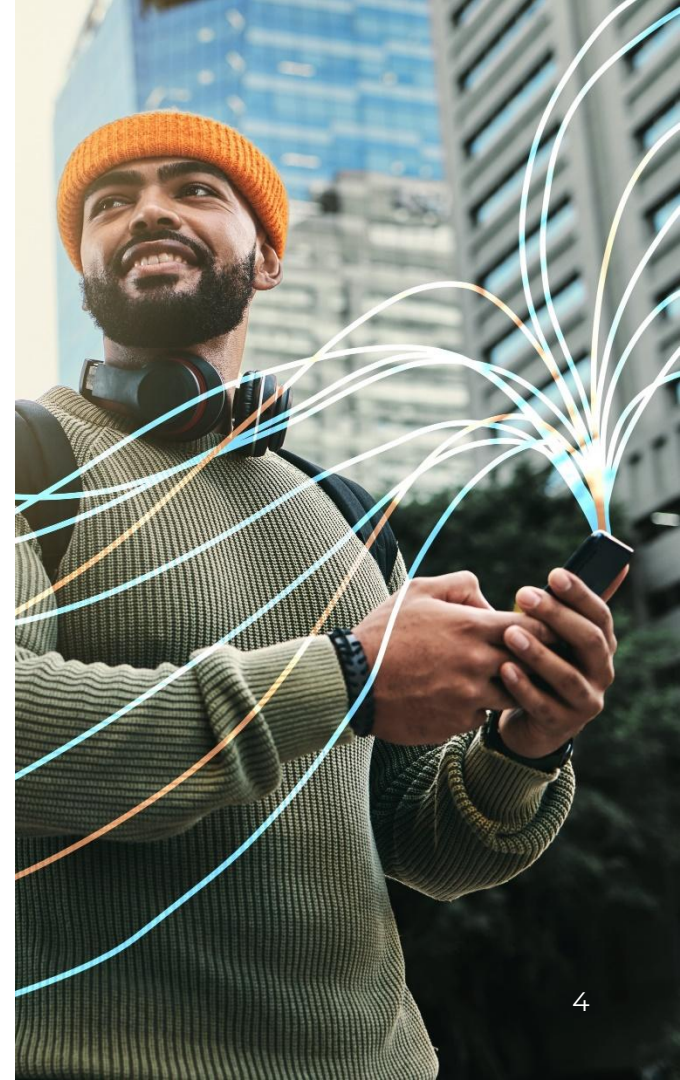
# Operator Lessons Learned

## *Real-time text (RTT)*

- RTT works based on VoLTE and Voice over Wi-Fi
- Not all device vendors had enabled the support of RTT on the handsets and not all device types support RTT
  - Not a problem with newer handsets
- Some PSAPs were not ready to receive RTT
- For fixed services, adapters were needed, which have not been readily available

## *Total conversation*

- In mobile networks, Total Conversation will be supported when operators support ViLTE



# Telecom Italia

## *Structural initiatives to support accessibility and to support EAA compliance*

- Adoption and updating of **corporate policies dedicated to accessibility and contractual documents** (e.g., contractual clauses, service charter containing the fundamental principles of conduct towards customers);
- Creation of **cross-functional and specialized training courses** aimed at various corporate functions;
- Conducting **periodic assessments on websites** (for public and internal use) and mobile applications;
- Introducing **accessibility requirements in procurement processes** and in relationships with suppliers;
- Integrating the **"accessibility by design"** principle into service development processes.

# Telefónica

## *Experiences implementing Real Time Text (RTT)*

- Implemented in June 2025, in compliance with the EAA
- Aim of making phone communication more inclusive and flexible
- **RTT allows:**
  - *Typing messages that appear instantly on the other person's screen (no need to press "send" button)*
  - *Both participants can type at the same time*
  - *The text channel is kept completely independent from the voice communication (allowing users to speak about one topic and type about another)*
- **Actions undertaken so far:**
  - *Telecom networks & device manufactures both needed to be adapted*
  - *Operators have upgraded their networks to ensure support*
  - *RTT is available in calls between smartphones*

## Way forward

- Other equipment still need to be adapted further to support RTT (i.e. emergency service systems)
- Ensuring this adaptation is the next major step
- By 2027 this extension will provide a critical way for people to communicate in emergencies when unable to speak
- This extension will result in overall improvement for safety/accessibility

# Liberty Global

Lessons learned from VodafoneZiggo – “Accessible” SIM re-design

## Accessible Design

(WCAG and Brand guidelines applied)

### Old Design



Improved  
contrast

ISO  
compliant  
QR

QR code to  
SIM  
instructions  
landing page

SCAN ME

Improved  
contrast

Link to SIM  
instructions  
landing page



**BeMyEyes**  
(Assistive Technology) can  
read and interpret all  
information



# Way forward

- Operators have taken major steps to implement the EAA, with a number of solutions dedicated to compliance & significant upgrades made to networks
- Although some challenges have arisen in implementation, many issues have been overcome
- Ensuring full support for emergency communications services for RTT will be an important next step

