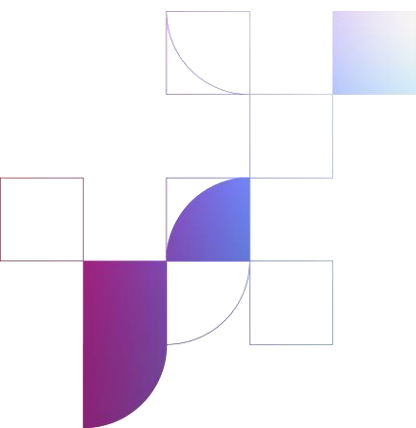


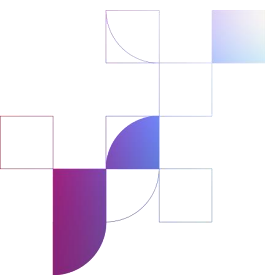
BEREC Statement

**BEREC urges operators, device manufacturers
and all other stakeholders to ensure
emergency calls access in the context of
2G/3G phaseout**

2 June 2026



This statement addresses the risks associated with fragmented approaches to the phase-out of legacy mobile technologies, in particular where both 2G and 3G networks are being switched off. It underlines the importance of thorough risk assessments by mobile network operators before phase-out, timely and transparent communication to end-users and relevant stakeholders, and the public sharing of best practices to minimise risks. The statement also invites all relevant stakeholders, including MNOs, industry associations, standards organisations, equipment vendors, device manufacturers and resellers of mobile devices, to contribute to a coordinated transition that safeguards reliable access to emergency communications.



Context

European end-users who use a mobile device capable of making telephony calls (such as a smartphone), rely on the fact that, if necessary, they can use their device to call emergency services, by calling 112¹ or any national emergency number (if specified by the Member State) (hereinafter referred to as “emergency numbers”). When a person calls an emergency number, the emergency services at the relevant public safety answering point (PSAPs)² should be able to answer and handle the emergency communication, and have access to subscriber number information (for instance to call back the caller immediately when the emergency call is interrupted³), and a usable indication of the caller’s location. This is described in Articles 108 and 109 of the EECC, the European Electronic Communications Code. That is why it is important that all mobile phones that are in use in Europe can make emergency calls promptly and with sufficient quality.

Also, a general obligation for network operators to publish relevant technical specifications for other stakeholders to know which equipment is compliant with their telecommunication networks stems from Article 4 of the Directive 2008/63/EC of 20 June 2008 on competition in telecommunications terminal equipment markets.

Challenges

For several years, BEREC⁴ and other organisations such as the European Emergency Number Association⁵ have already pointed to possible serious challenges linked to the 2G/3G phaseout. It is widely known that the devices suitable only for 2G or 3G networks will no longer work on mobile networks where such technologies are shut down, and need to be replaced in good time, well before such shutdowns. However, recent events show that a proportion of newer 4G or even 5G capable smartphones have also not worked as end-users may have expected after phaseout of both 2G and 3G. For example, recent events in Australia and Sweden have shown that after the phaseout of both 2G and 3G networks, some 4G phones are not capable of making emergency calls over a 4G network or lack geolocation and identification data, although they still can be used to make and receive other phone calls. Mobile phones that can be used to make calls over 4G and 5G but cannot be used to call emergency numbers over some networks, that cannot deliver handset-derived location information or that cannot be called back by emergency services after making an emergency call, can lead to costly seconds⁶ lost, or worse.

BEREC acknowledges that mobile network operators (MNOs) may choose to phase-out older technologies and replace them with more efficient and newer technologies, which is one of the benefits of the principle of service and technology neutral licensing. In addition, BEREC recognises the utmost importance for customers and businesses that MNOs that are phasing

¹ The single European emergency call number was introduced since 31 December 1992. Cf. [Council Decision of 29 July 1991 on the introduction of a single European emergency call number](#)

² public safety answering point’ or ‘PSAP’ means a physical location where an emergency communication is first received under the responsibility of a public authority or a private organisation recognised by the Member State;

³ This is not explicitly mentioned in the EECC but implemented in many countries

⁴ <https://www.berec.europa.eu/en/all-documents/berec/reports/berec-report-on-2g3g-phaseout-practices-and-challenges> (see also Annex 2 which sets out)

⁵ [EENA calls for delay of the 2G/3G shutdown until emergency communications issues are resolved - EENA](#)

⁶ Apart from the fact that it takes more time to establish a connection, also time is needed for the 112 desk to ask for otherwise available data such as identification, call back and location.

out technologies communicate timely about the possible implications and the options for their customers to ensure service continuity during and after the shutdown of legacy technologies.

At this moment there is not a definitive and unambiguous picture of what devices are affected on which network, and in which cases an update to the device or network equipment might be sufficient, or in which cases the device needs to be replaced. Moreover, there are indications that the affected phone types which may not be able to operate on all European networks are still being sold new in European phone shops and through other retail channels.

Suggested actions

In general, it is up to MNOs to decide when and how they introduce or phase out technologies, but the context and challenges outlined above may warrant appropriate actions, as described below. It is essential that MNOs planning phaseouts investigate the possible consequences for end user equipment, identify which equipment may be problematic, and communicate about this in a timely and transparent manner to end users and other stakeholders. Several NRAs are in communication with MNOs to stress the utmost importance of this matter, in particular to fully guarantee adequate access to emergency services.

BEREC also stresses the importance for MNOs that plan to phase out both 2G and 3G networks to take the necessary steps to ensure compliance with their obligations regarding the continuity of emergency calls during and after phaseout even if this implies that some MNOs may have to consider to support 2G or 3G longer than they originally have planned.

MNOs⁷ are in a position to conduct a risk assessment to identify the affected end-user smartphones. To avoid that people in Europe, in an emergency situation, try to make emergency calls with a device over a network that can no longer fully supports this device, BEREC is urging each MNO, to identify such user equipment as part of risk assessments and to take the necessary steps to mitigate the risks associated with it (in particular by engaging with device manufacturers) and to take corrective actions.

In addition, device manufacturers are also expected to supply equipment which supports certain features ensuring access to emergency services according to the RED Directive 2014/53/EU and implement solutions on their 4G and 5G devices that do not support VoLTE/VoNR emergency calls (software updates, in particular). BEREC emphasizes the need for close cooperation between MNOs and device manufacturers.

In due time before the phaseout date, MNOs should communicate, preferably publicly, transparently and in accessible terms, which devices will, and will not, be able to access their networks after the planned phaseout and the associated risks. This communication should be addressed to national and/or European citizens and other relevant stakeholders, including MVNOs they host, other network providers, equipment vendors, device manufacturers and resellers of mobile devices.

To avoid dangerous situations when users want to call emergency numbers but cannot, it is the case that MNOs who have switched off both 2G and 3G block affected devices from accessing their networks, as mandated in Sweden and, outside the EU, in Australia.

⁷ Where necessary MNOs can involve other stakeholders, such as MVNOs

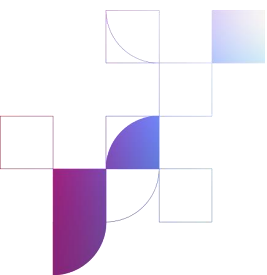
Transparent and public information on challenges and solutions and affected equipment is necessary and can avoid serious incidents or replication thereof. There are a number of benefits with such timely open information and appropriate actions.

- It helps to inform (re)sellers of such user equipment to know for which 4G and 5G equipment no network or device software or firmware updates or user settings are available to make emergency numbers accessibility possible, and therefore preferably should be taken off the European market or be sold only with the explicit advice that the phone will no longer work for emergency calls once the 2G and 3G networks are switched off.
- It helps to inform other MNOs in Europe of the importance of coordination to ensure the continuity of emergency calls for their subscribers while roaming, and it helps to inform other MNOs in Europe that are contemplating phaseouts.
- It helps to inform network equipment vendors to determine what updates are needed to ensure access to emergency numbers for all 4G and 5G mobile devices.
- It helps to inform device and firmware manufacturers to determine what updates are needed for the devices that they support, to ensure access to emergency numbers for all 4G and 5G networks, and to indicate which devices cannot be supported anymore to be used on a network without 2G or 3G.

And it helps to achieve that European users can rest assured that every device that they can use can call emergency numbers if needed. To this end, emergency call testing platforms could, in particular, be set up.

BEREC therefore invites all stakeholders, as well as relevant industry associations and standards organisations involved in the development of mobile technologies, to consider their role in contributing to ensure a successful transition. The objective should be clear: users in Europe should be able to rely on any 4G or newer mobile device bought in Europe to access emergency services safely and reliably, on any mobile network in Europe and, as far as technically and commercially feasible, beyond Europe.

This level of interoperability and reliability has been a defining feature of European mobile communications since the GSM initiative. It should be preserved during the current transition from legacy technologies and safeguarded in future technology transitions. Achieving this will require coordinated action by the telecommunications industry, hardware and software manufacturers, governments, regulators and the European citizens.



Annex 1.0 Copy of Figure 1.0 from BoR(23) 204 on Overview of potential challenges with 2G and 3G phaseout, with examples, impacts and identified practices

