

Sent by e-mail to: BEREC-WP2026@distro.berec.europa.eu

23 October 2025

Public Consultation on the draft BEREC Work Programme 2026

Dear Sir/Madam,

EENA, the European Emergency Number Association, is a non-governmental organisation with the mission to contribute to improving the safety and security of people. We are proud to be a platform for everyone involved in the public safety community and to provide a space for collaboration and learning.

EENA welcomes the opportunity to respond to this public consultation on BEREC's Draft Work Programme for 2026. EENA's comments are limited to elements of the work programme related to promoting the interest of the citizens, most notably those related to emergency communications.

1.11. Ad hoc work to support information exchange on 5G private networks, direct-to-device satellite communication, phaseout of 2G and 3G mobile technologies, and hybrid networks

EENA welcomes BEREC's decision to continue to support capacity building workshops on the topics of the 2G and 3G phaseout, and on direct-to-device satellite communications. Particular focus should be given to the impact of the 2G/3G phaseout, and direct-to-device satellite communications on emergency communications. It may also be beneficial to undertake ad hoc work to consider the impact which advances in artificial intelligence will have on emergency communications.

EENA considers that its expertise and insights on emergency communications could benefit any ad hoc work on these three topics.

2G/3G Phase Out:

The phaseout of 2G and 3G networks and the transition to packet switched emergency communications remain key challenges for emergency communications in Europe.

BEREC's most recent Article 123 EECC report found that "the switching off of 2G/3G mobile technologies may present interoperability challenges, and that should be tackled as soon as possible." These issues can result in end users' devices being unable to transmit caller location to PSAPs, and PSAPs being unable to callback end users in emergencies. As more countries switch to packet switched emergency communications, these issues require urgent attention. Further details on these challenges can be found in a recent [EENA report](#) on the topic.

To address these challenges, EENA recommends that BEREC undertakes specific ad hoc work to address interoperability challenges for emergency communications over IMS. This could take the form of dialogues between representatives of national regulators and mobile network operators to discuss and identify solutions.

Direct to Device Satellite Communications

EENA welcomes BEREC's decision to consider ad hoc work on Direct-to-Device communications in 2026. This new technology brings considerable opportunities and risks for emergency communications, which is seen as one of the main initial use cases for the technology.

[EENA's 2025 report on emergency satellite communications](#) identified two main use cases for Direct-to-Device; improving access to 112 in remote areas, and improving the resilience of 112 by providing fallback connectivity following a terrestrial network failure. The latter use case is particularly important in Europe, where terrestrial mobile coverage is extensive, but concerns remain over its resilience.

It is also critical that this technology is implemented in a manner which meets the needs of end users in emergencies. In this regard, it is critical that number based direct to device services comply with the existing rules for emergency communications in Article 109 EECC, wherever technically feasible. Certain emerging practices in bringing this technology to end users, such as by directly integrating direct-to-device connectivity into certain handsets without involving a terrestrial mobile network operator, may also have disruptive impacts on our existing model of electronic communications and warrant further discussion.

As these issues will gain more prominence over the next 12 months, EENA recommends that BEREC hold workshops which assess how this technology will affect emergency communications. Given EENA's ongoing experience in working with this technology, EENA would be pleased to provide a presentation to BEREC on this technology's potential impact on emergency communications.

Artificial Intelligence

In addition to the above listed topics, EENA proposes that BEREC undertake ad hoc work in 2026 to address the use of artificial intelligence in emergency communications.

EENA's work on this topic has identified several sector specific challenges for emergency communications. These include the need to protect sensitive emergency communications data, and the need to optimise networks for emergency communications and during crises.

Advances in artificial intelligence have continued globally, with AI now integrated into emergency communications systems in some countries. Ensuring that AI advances, rather than undermines public safety during emergencies should therefore be a key topic of discussion for BEREC in 2026.

3.3. Workshop and Report on practices for ensuring equivalence of access and choice with respect to accessibility

EENA would welcome the opportunity to contribute to BEREC's work on accessibility in 2026.

EENA is monitoring the implementation of Real Time Text and Total Conversation for emergency communications across Europe, and will publish an Accessibility Report Card in February 2026, outlining their state of implementation in all EEA states.

This report, along with our ongoing work with PSAPs and other stakeholders to improve the accessibility of emergency communications, could provide the basis for discussions within BEREC on accessibility.


4. Strategic priority: Contributing to environmentally sustainable, secure and resilient digital infrastructures

EENA welcomes the BEREC's strategic focus on improving the resilience of both terrestrial and non-terrestrial communications networks, particularly during crises. Many events which cause telecommunications outages, such as storms and earthquakes, are directly correlated with increased need for emergency services, underlining the importance of this topic for public safety.

The vulnerability of telecommunications networks during certain crises, and their dependence on energy networks became prominent issues in 2025, with large scale outages in the west of Ireland in January 2025, and in Spain and Portugal in April 2025. Important lessons on improving the resilience of these networks have also been learned in Ukraine since 2022, which merit discussion.

Please contact me if you require any information or clarification on our submission.

Yours sincerely,


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Senior Policy Officer
European Emergency Number Association.