

Sent by e-mail to: BEREC-WP-2024@distro.berec.europa.eu

6 November 2023

Public Consultation on the draft BEREC Work Programme 2024

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 2024. 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.

BEREC Opinion on Article 123 EECC

As stated in the draft Work Programme (Section 3.4), BEREC is tasked with publishing an opinion on the application of Title III of Part III of the EECC (referring to end-user rights) every three years or more frequently if at least two Member States make a reasoned request. As noted, the last opinion was published in December 2021¹.

The proposed work item will *inter-alia* analyse to what extent effective access to emergency services is appreciably threatened, in particular due to an increased use of number-independent interpersonal communications services, by a lack of interoperability or technological developments.

Since the publication of the last opinion, the regulatory landscape in the European Union has changed with the entry into force of Commission Delegated Regulation (EU) 2023/444². EENA would like to contribute to the proposed workshop scheduled for Q.2. 2024. EENA considers that its expertise and insights on emergency communications could assist BEREC in fully informing its opinion on this matter.

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

Yours sincerely,



Freddie McBride

Director – Digital Communications Policy and Regulation,
European Emergency Number Association.

¹ BEREC [BoR\(21\) 177](#), "BEREC Opinion on the market and technological developments and on their impact on the application of rights of end-users in the EECC", December 2021.

² [Commission Delegated Regulation \(EU\) 2023/444](#) of 16 December 2022 supplementing Directive (EU) 2018/1972 of the European Parliament and of the Council with measures to ensure effective access to emergency services through emergency communications to the single European emergency number '112'