

15 July 2025

Public consultation on the draft BEREC Draft BEREC Strategy 2026-2030

Dear Sir/Madam,

EENA welcomes the opportunity to contribute to BEREC's consultation on its Draft Strategy for 2026-2030.

The Draft Strategy would address many of the issues facing access to emergency communications in Europe. Nevertheless, EENA has identified some amendments to the Draft Strategy to further increase its added value for public safety, which are set out below.

Priority 1. Promoting full connectivity and the Digital Single Market

EENA welcomes BEREC's focus on promoting access to connectivity infrastructures, enhancing coverage and take-up, while supporting standardisation and interoperability efforts. In particular, EENA appreciates the focus on meeting the European Union's 2030 Digital Decade Policy Program targets, which could improve access to 112 in remote areas.

Increasing cooperation by MNOs with satellite operators is identified by the Draft Strategy as an area which BEREC will address in the coming years. While the draft BEREC strategy proposes to address several questions connected to this new technology, such as "competition dynamics, end users' rights, cybersecurity or lawful interception", EENA would appreciate if specific attention is also given to the provision of access to 112 by these services, which creates both opportunities and risks.

Satellite communications may improve access to 112 in areas without cellular connectivity, or provide fallback connectivity following a failure in terrestrial communications networks. However the technology currently presents several drawbacks compared to standard communications to 112. For example, the low bandwidth of Direct to Device communications may make calls to 112 impossible, while the requirement for some services to use an emergency relay centre, instead of routing communications directly to Public Safety Answering Points (PSAPs) may delay people in emergencies from getting the help they need.

As a result, EENA invites BEREC to add "emergency communications" to the list of questions which it will address connected to this new technology, to ensure that this technology adds to public safety by improving the coverage of 112 without not impacting the current quality of access.

Priority 3: Empowering End Users

EENA welcomes BEREC's decision to continue closely monitoring the phase out of 2G and 3G legacy networks. Despite their importance for public safety, a lack of MNO cooperation with PSAPs when planning the 2G/3G phase-out has created significant issues for PSAPs, creating safety risks and requiring MNOs to maintain these networks until solutions are found. As a result, 41% of National Regulatory Authorities have [identified](#) the 2G/3G shutdown as having significant risks for emergency access.

Particular issues for loss of access to 112 will be faced by the tens of millions of vehicles in the EU which are equipped with legacy eCall, which will cease to function following the 2G/3G shutdown. In parallel to this, PSAPs across Europe are preparing to receive communications from new 4G/5G capable Next Generation eCall (NGeCall) modems, which will be required in vehicles placed on the EU market from 1 January 2026. Ensuring that users of vehicles equipped with legacy eCall do not lose access to emergency services, and that new NGeCall modems work effectively should therefore be a priority for BEREC in the coming years.

In addition, as emergency communications are now transitioning to VoLTE, EENA has become aware of significant operability issues for emergency communications which require urgent attention from BEREC. For example, PSAPs cannot receive handset-derived caller location, such as AML, from users who are roaming over IMS in another Member State, or to call back these users if the call drops. These callback issues will extend to the majority of eCall devices, which are in "permanent roaming".

These issues, which are outlined in more detail in this EENA [document](#) could have a significant impact on public safety in the coming years. EENA therefore invites BEREC to discuss these issues in more depth during 2026-2030 to ensure they are resolved.

In particular, BEREC should take a leading role in coordinating Member State 2G and 3G shutdowns across Europe to ensure that they do not have a negative impact on public safety.

Finally, EENA welcomes the decision by BEREC to ensure that providers of number-independent interpersonal communication services (NI ICS), maintain the current standards of end users' protection and a level playing field for functionally equivalent services. Access to emergency services through the number 112 is most important of all features to ensure end users protection.

The reception of emergency communications from NI ICS may create issues for PSAPs, many of whom currently lack the technology to receive, transfer and process these communications in an equivalent manner to traditional voice calls. This limitation slows emergency responses, undermining the functional equivalence of accessible services like RTT, and the potential of innovations like satellite communications to improve the resilience of 112. Existing IP solutions such as ESInets, as described in ETSI TS 103 479 can solve this issue, but haven't been implemented in most EU Member States.

Therefore, to ensure emergency communications keep pace with new technologies, BEREC should lead discussions with National Regulatory Authorities to ensure that any future adoption of NI ICS for emergency communications maintains existing end user protections such as access to 112, and that PSAPs are able to transfer and process these calls in an equivalent manner to standard voice calls.

Priority 4. Contributing to environmentally sustainable, secure and resilient digital infrastructures

EENA welcomes the increased focus on resilience in the 2026-2030 Strategy, particularly given the rising impact of climate and geopolitical tensions on our networks. EENA stands ready to contribute to work in this area over the next five years.

In particular, EENA welcomes BEREC's focus on calling for resilience to be embedded in ECN infrastructure, and the recognition that always-on connectivity is particularly important when responding to emergencies. In this regard, focusing on collecting best practices in establishing reasonable back-up capacities and cooperation schemes for mitigating the impacts of serious incidents is also timely and welcome.

Kind regards,

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Policy Officer | European Emergency Number Association - EENA

Email: ■■@eena.org | [EU Transparency Register](#) | [Privacy Policy](#)

