Feasibility Report: An ECO-hosted directory of E.164 numbers to facilitate contact between PSAPs in different European countries

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# Executive summary

In 2011, the European Emergency Number Association (EENA) established a database containing internationally diallable E.164 telephone numbers of public safety answering points (PSAPs) in different European countries. This database is essentially a confidential telephone directory that can be consulted by participating PSAPs in different European countries when they require cross-border assistance to deal with an emergency incident. In April 2015, EENA wrote to the chairman of the ECC's Working Group Numbering and Networks (WG NaN) requesting the CEPT/ECC to consider taking over the responsibility for the management of the directory.

This ECC Report is a Feasibility Study examining the issues associated with the European Communications Office (ECO), as the permanent office of CEPT/ECC, taking over from EENA the responsibility of developing and maintaining a confidential directory of contact information for European PSAPs under a framework established by the ECC. In this document, an ECO-hosted confidential directory of contact information for European PSAPs is referred to as PSAP-DIR.

Chapter 1 of this Report introduces the issue and sets out the reasons for EENA's approach to the ECC and outlines the scope of the document.

Chapter 2 provides background on the handling of emergency calls and identifies several call scenarios where communications between PSAPs in different countries might be needed. This chapter notes that the purpose of this directory would be to facilitate inter-PSAP communications and should not be seen as solution for citizens to have any control or influence on where emergency calls are answered but rather as an internal operational support tool for European PSAPs.

Chapter 3 summarises the expected level of support from emergency services stakeholders in CEPT countries for PSAP-DIR. This summary is based on responses received to two questionnaires. 32 responses were received to the first questionnaire from emergency services organisations in 23 (of 48) CEPT countries. Following a review of those responses, a second set of questions were issued to those organisations that had responded to the first questionnaire. 24 responses were received from administrations or emergency services organisations in 19 CEPT countries. The detailed results of both questionnaires are provided in Annex 2.

Chapter 4 describes the current EENA directory including information on the terms and conditions of access and the responsibilities of EENA and the participating PSAPs.

Chapter 5 considers the remit of the ECC in emergency services communications. This chapter lists several key deliverables published by the ECC. It also considers the ECC Strategic Plan and the terms of reference of the WG NaN and provides arguments for and against the ECC's involvement.

Chapter 6 considers the technical and administrative issues associated with developing and maintaining PSAP-DIR. This chapter describes how PSAP-DIR could be structured and how data entry, maintenance and membership management could be handled. It provides an initial set of protocols for use of PSAP-DIR and describes contingency plans that could be implemented for maximum availability and security.

Chapter 7 identifies the legal basis for PSAP-DIR and the potential elements in a contract.

Chapter 8 provides a risk assessment taking into account the risk of legal actions (against ECO), physical damage and natural events, loss of essential services, unauthorised access to an online version of the directory, technical failure and unauthorised access to an offline version of the directory. Each risk is scored based on probability and impact. Mitigating measures for each risk category are also provided.

Chapter 9 contains an impact assessment which examines the potential impact on the involved stakeholders including on CEPT administrations, the ECO, PSAPs (those participating in PSAP-DIR and those not participating) and, more generally, on the provision of emergency services in Europe.

Chapter 10 summarises the main findings identified and discussed in this Feasibility Study which will inform the ECC's decision on whether or not to proceed. These are:

* The questionnaire results have established that the majority of organisations and countries that responded are, in principle, supportive of the proposal for the ECO to assume responsibility for the operation of PSAP-DIR and indicated that they would be willing to participate in such a scheme.
* Responses were received from 32 organisations in 23 (at the time of asking, 15 of them already used the EENA directory) out of 48 CEPT countries to the first questionnaire[[1]](#footnote-2), hence terms such as ‘majority’ represent the majority of those that responded to the questionnaires, and may or may not reflect the views of the majority of CEPT members.
* Many respondents agreed that PSAP-DIR would offer advantages to PSAPs for a number of relevant use cases. Very few respondents believed that the operation of PSAP-DIR would interfere negatively with the operation of PSAPs.
* The level of interest and support from European PSAPs in an ECO-hosted PSAP-DIR justifies the need for preparing a Feasibility Study on this subject.
* Some respondents expressed concern that PSAP-DIR could interfere with existing and well-functioning bilateral agreements between countries. For the avoidance of doubt, the proposal set out in this Report would not seek to replace such existing processes; rather it is envisaged to be an additional resource available to PSAPs to take advantage of when necessary.
* Reflecting the views of respondents, it is proposed that responsibility to ensure that information in PSAP-DIR is accurate and up to date lies exclusively with a designated focal PSAP in each country. The specific requirements (regarding the security levels, the different levels of access privileges etc.) would need to be determined, after consultation with emergency services organisations, during the implementation stage.
* PSAP-DIR is proposed to be used by PSAPs to respond to a variety of use cases. There were significant diverging views regarding the case of third party services (TPS) eCall. Having carefully considered the responses, the ECC is of the view that TPS eCall is not an appropriate use case, for PSAP-DIR to cater for and TPS eCall service providers will not be granted access to PSAP-DIR.
* The existence of PSAP-DIR should not allow operators providing services to multi-site corporate networks or nomadic VoIP services to avoid their current statutory obligations for the conveyance and routing of emergency calls to the correct PSAP.
* The number of contact numbers per country remains an open question. A single contact number that is able to route to fall-back PSAPs for resilience purposes could be achieved or a small number of contacts could be available. The specific approach would need to be agreed between the emergency services organisations if PSAP-DIR is implemented by the ECO.
* Practical and operational issues raised in response to the questionnaires such as how to deal with SIM-less, hoax and malicious calls are a matter for the involved PSAPs. Such matters are not anticipated to affect the viability PSAP-DIR. PSAP-DIR could contain additional information on whether SIM-less calls or emergency calls without Calling Line Identification are allowed.
* A key issue raised was whether the PSAP-DIR should be mandated or voluntary for EU Member States. Four respondents from two countries (Spain (3) and Germany (1)) have called for a mandated approach and have indicated that they would not support a voluntary scheme. Others have either supported a voluntary approach or, if supporting a mandated approach, would still participate in a voluntary scheme. It should be noted that the proposal from CEPT/ECC is for a voluntary approach, and it does not have any legal requirement for mandating any requirements on CEPT countries. Mandating any such solution for EU Member States is a matter for the EU.
* A transfer of responsibility for PSAP-DIR from EENA to the ECO would reset the participation to zero. In each case, an agreement would have to be concluded between the concerned party and the ECO which would recognise the rights and responsibilities of both parties.
* The financial consequences for ECO are not covered in this report. The ECO Council is the appropriate entity to consider this, and it is being addressed internally.
* It has not been settled whether hosting PSAP-DIR is a relevant activity for the ECC, and hence is within the ECO's remit.
* The outcome of this Feasibility Study will be considered along with an internal assessment of the estimated costs of developing and maintaining PSAP-DIR. Subject to the decision from the ECC Plenary and the approval by the ECO Council, the ECO may develop and maintain PSAP-DIR.

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# Introduction

In 2011, the European Emergency Number Association (EENA) established a database containing internationally diallable E.164 telephone numbers of public safety answering points (PSAPs) in different European countries. This database is essentially a confidential telephone directory that can be consulted by participating PSAPs in different European countries when they require cross-border assistance to deal with an emergency incident. Today, the current EENA directory contains contact details for PSAP operators in 19 countries[[2]](#footnote-3).

In April 2015, EENA wrote to the chairman of the ECC's Working Group Numbering and Networks (WG NaN) requesting the CEPT/ECC to consider taking over the responsibility for the management of the directory. EENA explained in its letter that despite PSAP operators in some countries pledging support for the concept, they were reluctant to participate because EENA is a non-governmental organisation, and these PSAPs expressed a preference for the directory to be hosted by an appropriate public European body with relevant expertise and experience to provide the service.

This ECC Report is a Feasibility Study examining the issues associated with the European Communications Office (ECO), as the permanent office of CEPT/ECC, taking over from EENA the responsibility of developing and maintaining a confidential directory of contact information for European PSAPs under a framework established by the ECC.

The purpose of this document is to:

* Investigate and determine the expected level of support from relevant authorities and PSAP operators in CEPT member states for an ECO-hosted directory and analyse the possible use cases for such a directory.
* Analyse important aspects such as the legal and practical issues (e.g. liability and competition issues) of hosting such a directory and to identify any potential risks or issues that the ECC deems prudent for consideration.
* Provide a conceptual level technical description of an ECO-hosted directory and how it would work.
* Explain how the proposal for the ECO to develop and maintain such a directory would be within the scope of the remit of CEPT/ECC and the ECO.
* Outline the expected impact on National Regulatory Authorities, Ministries, relevant PSAP authorities and PSAP operators, the CEPT/ECC and ECO.
* Draft the possible terms and conditions for PSAP participation in and use of the directory.
* Summarise the main findings in a concluding chapter that will inform the ECC Plenary's decision on whether or not to proceed.

"PSAP-DIR" is the term used throughout this Report to describe an ECO-hosted directory to facilitate inter-PSAP communications in Europe.

During the public consultation phase, stakeholders were kindly asked to provide comments and insights on the proposal and on the content of the Feasibility Study. The ECC will then decide, having also considered the submissions to the consultation, if it is appropriate for the CEPT/ECC, and the ECO to be involved in this activity.

# Background

Calls to emergency services are originated and terminated nationally. This is also the case when the call is made to 112. For European citizens travelling in Europe, this means that a call made to 112 will be answered in the country from which the call was made. In the vast majority of cases, this will result in effective emergency assistance being received, but there are some cases where assistance from emergency services in another country may be required, for example:

* A caller to emergency services could be requesting assistance for a relative in another country.
* A PSAP may have a need to communicate with a PSAP in the caller's home country in order to assist, e.g. with translation, next of kin lookup and ehealth records lookup.
* An emergency caller may, in border areas or at sea, particularly where bilateral agreements are not in place, inadvertently roam onto a foreign network leaving the call to be answered in a country other than where emergency assistance is required.
* Calls from IP-based networks, corporate networks and smart phone applications could also end up being unexpectedly answered by a PSAP in another country (N.B. work is ongoing within ETSI to improve caller location information for emergency calls originating on IP-based networks).

While technical developments continue to improve caller location information, allowing emergency calls to be routed to the correct PSAP, there could remain situations for which access to emergency services may require additional solutions.

These scenarios can be served from the provision of a facility, as currently provided by EENA, which allows European PSAPs to communicate with each other when cross-border assistance is required. This facility is provided in the form of a directory containing contact information for a designated focal PSAP in each European country. Access to the directory is granted to all European PSAP operatives, under certain terms and conditions, and the directory can be interrogated to find the correct contact information in order to deal with a cross-border call in an expeditious manner.

It should be noted that the purpose of this directory would be to facilitate inter-PSAP communications only. It should not be seen as solution for citizens to have any control or influence where emergency calls are answered, but rather as an internal operational support tool for European PSAPs.

Independently of an emergency call, an efficient system for distribution of contact details between PSAPs may result in improved communication and coordination between PSAPs leading to faster emergency response.

# Expected Support from European Emergency Services Stakeholders

In the course of gathering evidence and establishing levels of support for the PSAP-DIR proposal, two questionnaires were published. The results of both are summarised in this section, while Annex 2 of this report provides additional detail:

* 32 responses were received to the first questionnaire from emergency services organisations in 23 (of 48) CEPT countries. The replies come mostly from the countries that use already the current EENA directory (16 responses from 23 countries).
* Following a review of those responses, a second set of questions were issued to those organisations that had responded to the first. 24 responses were received from administrations or emergency services organisations in 19 CEPT countries.

## Responses from the first questionnaire

The first questionnaire comprised 12 questions that can be divided into four broad areas.

###  Levels of support for, and anticipated benefits of, PSAP-DIR

The first question was addressed only to those countries that already participated in the EENA-managed database/directory. It asked whether the EENA facility helps Emergency Authorities in their work. As mentioned above, responses were received from emergency authorities in 13 of the 15[[3]](#footnote-4) countries that participate in the EENA database, with all but one respondent asserting that the EENA database does help in their activities. Croatia responded ’no’ to this question, explaining that they had never had a call that required its use. The levels of use from other countries varied significantly with some countries using it rarely with others taking advantage of the facility multiple times (in some cases hundreds of times per year).

The second question asked whether respondents were supportive of the idea of the ECC assuming administration of the database from EENA for use by European PSAPs on a voluntary basis. Of the 32 respondents, 29 indicated that they were supportive of the proposal, with comments mainly arguing that this approach could increase the number of participants in the scheme hence improving its effectiveness. One respondent, the Spanish regional PSAP operator from Ciudad Autónoma de Melilla (Amgevicesa), was neutral on this question, indicating that more information was required before a conclusive answer could be made. Of the two respondents that responded negatively, one (Denmark), argued that they could not support the ECO maintaining such information regarding their PSAPs. The other, Amgevicesa, gave no specific reasons for opposing the proposal.

While the Swedish PSAP operator (SOS Alarm) expressed support for PSAP-DIR, the Swedish national regulatory authority (PTS) reserved its judgement on this question, awaiting the outcome of the Feasibility Study and, in particular, clarity regarding the legal issues associated with the transfer of the database from EENA to ECC.

Germany stated: "After coordination has taken place, the nationwide experts group on emergency calls has in principle a positive attitude towards such a database. From the perspective of the operators of the PSAPs for the national (110) and for the European unified (112) emergency number, however, the following conditions must be met compulsively:

1. The European Commission compulsively mandates the participation of all Member States via a European legislative process.

2. The database must fully support the federal structure in Germany and must reflect the regional responsibilities within Germany accordingly.

3. The use of the database must be limited to the use cases 2.1 and 2.2 of the query.

Justification: The model of voluntary participation in this database leads to the wrong expectations of EU citizens that the possibility of the Transnational Emergency Calls is permanently available. If the database project does not fulfil the above-mentioned conditions, then from the viewpoint of PSAP operators in Germany a takeover from EENA of that database project by the ECC as an organisation, which represents a group of national administrations in Europe, has to be rejected."

The third question asked those that had indicated support for the proposal whether they would consider participating in the PSAP-DIR project. The question acknowledged that in participating, PSAPs would need to get access to, and share contact details with, PSAP-DIR which may result in costs being incurred by the PSAP. Of the 28 that responded yes to Question 2, 26 indicated that they would consider participating in the project, although for three of these, this response was subject to the costs being clarified and reasonable. Moreover, those that indicted that they would not consider participating cited concerns over the potential costs involved. For clarification, in the questionnaire the proposal was that PSAP-DIR would be provided to its user community free of charge. Approval to commit the financial and human resources required to develop and maintain PSAP-DIR is a matter for the ECO's governing body, the ECO Council, to decide upon. The projected costs will be considered internally in conjunction with the findings of this Feasibility Study.

The fourth question asked could such a database help to carry out the duties of PSAPs more effectively. In response, 31 respondents considered that PSAP-DIR could help them carry out their work more effectively and gave examples of how the database could be useful such as:

* Dealing with the case in which a caller in one country is calling for help for a relative in another country.
* Providing effective information management between PSAPs internationally.
* Handling incorrectly routed emergency calls originating on VoIP and corporate networks.
* Receiving calls made in one country on behalf of someone in another country who communicated with the caller by internet direct messaging.
* Allowing PSAPs to contact each other for translation services when needed.
* Accidents at sea.
* Indicating origination information (A-number) and forward to country B.
* Transmitting early warning information/emergency/crisis situations status between PSAPs (Example provided by Sweden of thunderstorm in Latvia which spread to Estonia and Finland).
* Dealing with calls from tourists.

Some respondents noted that bilateral agreements are already in place with neighbouring countries to deal with inadvertent roaming calls. These bilateral agreements may extend to include arrangements for resource sharing, and it should be clear that the PSAP-DIR, as proposed here, is intended to complement, rather than replace, any existing bilateral agreements. Concerns were also raised regarding the operational procedures, including training, which would need to be established to ensure that the facility is used most effectively.

### Operational and logistical implications of operating PSAP-DIR

The next set of questions dealt with how PSAP-DIR, should it be implemented, would operate in practice. Question 5 asked for views on the proposal that the responsibility for the correctness of the information lay with a designated focal PSAP within each country. 29 respondents agreed with this approach with some offering suggestions such as regular reminders to review information and that any updates would automatically be notified to all participants. Those that did not respond to this proposal or were not supportive gave no additional information to support their position.

Question 6 sought to better understand the use cases for which PSAP-DIR could be most effective. Five broad categories of user case were proposed, and respondents were invited to assess whether PSAP-DIR would be helpful in dealing with them. These categories were:

* Transnational emergency calls.
* Inadvertent roaming.
* Misrouted calls from VoIP networks.
* Calls from corporate networks.
* Third Party Services (TPS) eCall.

For all these scenarios, except for TPS eCall, there was almost universal consensus that PSAP-DIR would be useful. However, the few that argued against some of these scenarios, pointed out that bilateral agreements between countries already existed, which would be more effective in certain situations (such as roaming). Moreover, a number of respondents (supportive or otherwise) argued that the use of PSAP-DIR should only be used as a last resort, and organisations such as corporate networks or VoIP service providers should follow existing national regulations and not rely on this mechanism to ensure contact with the correct emergency authorities.

For the use case of TPS eCall, the view that PSAP-DIR could be effective was not quite as unequivocal as for the first four cases. While around 20 respondents indicated that PSAP-DIR could be effective, some of these believed that it should be a fall-back option only or that the contractual terms of access would need to be carefully considered. Of those believing that PSAP-DIR would not be effective at handling TPS eCall, some argued that there would be significant issues in granting access to the PSAP contact information to TPS eCall service providers.

Question 7 asked respondents to consider the most suitable PSAP contact information to provide in the proposed PSAP-DIR. Four options were proposed:

* One primary PSAP per country.
* One primary PSAP plus one back-up PSAP per country.
* As many PSAPs as each country wants to register.
* Only PSAPs handling 112 calls.

The majority of responses favoured a single (primary PSAP) per country. A number of those supporting this proposal cited the operational simplicity of contacting a single PSAP without needing to understand the internal organisational structures within another country. However, as Ireland noted, this would require that the primary PSAP has the capability to handle and route incoming calls appropriately. On the other hand, the response from Slovakia insisted that a back-up should be available in the event of a connection issue to the primary PSAP (e.g. power failure).

With regards to the suitability of a back-up PSAP, opinion was evenly divided. Only a few respondents (such as Denmark and Lithuania) supported the ‘Primary plus back-up’ proposal yet didn’t support the single, primary PSAP option. On the other hand, rather more respondents (such as Sweden) supported a single PSAP and specifically rejected a back-up PSAP. Indeed, Sweden argued for a single number which automatically re-routed to a backup PSAP if necessary.

Respondents rejected by around 2:1 the proposal that the directory could contain as many PSAPs as the country wishes to register. Norway indicated that should a single PSAP (or primary + back-up) approach be adopted then this could require organisational changes within and between the emergency authorities. However, proponents of multiple PSAP entries argued that this was to ensure emergency calls were quickly directed to the correct PSAP in a country.

There was widespread support for the proposal that only PSAPs handling 112 calls would be eligible to access and contribute to the PSAP-DIR.

In summary, a single, primary PSAP per country was most supported by respondents, although how resilience would be provided (i.e. through a secondary contact PSAP or via automatic re-routing) may need to be considered further to address the concerns of some respondents.

The final question in this section regarding operational issues was Question 11, which asked: “In some countries emergency caller are not identifiable (e.g. SIM-Less calls) how should cases of false alarms or fraud be treated?” There were no proposed answers to this question; hence respondents provided individual ‘free-form’ answers. There was a general view that issues such as hoax calls or false alarms would need to be dealt with through the normal practices (and legislation) of the country that originally handled the call.

### The potential implications to the existing practices of PSAPs

Questions 8 and 9 sought to understand the potential consequences of the operation of the proposed PSAP-DIR on the operational practices of PSAPs.

Question 8 asked: “Do you think that the ECC [ECO], by hosting [PSAP-DIR], interferes in a negative way with the operation of the emergency services in your country?” The overwhelming majority indicated that such a proposal would not interfere with existing operations, although a number of caveats and qualifying statements were made. For example, Norway and the PSAP operator from Balearic Islands (Spain) indicated that processes and practices of routing calls would need to be considered. Moreover, the PSAP operator from Extremadura (Spain) stated that PSAP-DIR would need to respect the model of 112 call delivery in each country. Amgevicesa (Spain) argued that PSAP-DIR would impact on its practices arguing that the directory imposed considerable responsibility on participants without a clear and legal framework within which to operate.

Question 9 was addressed only to those PSAPs who considered that they would not participate in the PSAP-DIR project. It asked: “Do you envisage that the implementation of a database … will have an impact on your activities?” Nine responses were received which were broadly mixed: three indicating that it would not have a negative affect (Denmark indicated that they already operate a similar directory). Four respondents indicated that such a directory could have an impact on their activities – for example, Amgevicesa (Spain) cited the potential legal problems indicated in its response to Question 8. Two further respondents gave no definitive view.

### General remarks and willingness to participate in drafting specifications

Question 10 asked respondents whether they would be willing to help draft the terms and conditions for any proposed PSAP-DIR. There was a generally positive response to this question, and will be taken into consideration should the project move into specification phase.

Finally, all respondents were asked to provide any additional comments (Question 12).

A variety of statements were made in response to this question. Some responses provided general support for the PSAP-DIR proposal, or offered suggestions regarding its implementation. In particular, the critical importance of the confidentiality of the details that the PSAP-DIR would hold and how access to the directory would be granted was raised as potential issues. Many of these concerns will be addressed elsewhere in this report.

### Summary of responses to the first questionnaire

The results of the questionnaire indicate a generally positive and supportive response from the PSAP community in Europe to the concept of an ECO-hosted, voluntarily used, PSAP directory. However, important and specific concerns have been raised by a number of respondents, particularly in relation to legal concerns and with respect to the ECC’s remit in the area of emergency services. In particular, a key question remained as to whether the adoption and use of the PSAP-DIR should be mandated across EU member states. To understand the support for a mandated PSAP-DIR approach a second questionnaire was produced.

## Responses from the second questionnaire

The first questionnaire proposed participation in, and use of, PSAP-DIR on a voluntary basis. One respondent (Germany) has “in principle a positive attitude towards such a database”, but stated that certain conditions must be met including "that EC compulsively mandates the participation of all Member States via a European legislative process". One other respondent Amgevicesa (Spain), in response to Question 8, considered that the ECC, by hosting such a database, could interfere in a negative way with the operation of the emergency services "without a clear and legal framework or an operational situation organised and implemented". To find out the respondents’ views on an EU-mandated approach, a further questionnaire was issued on 9 March 2016 which posed two additional questions. This questionnaire was sent only to those that had responded to the initial questionnaire.

In total, 24 responses were received from 19 countries.

Question 1 read: Please select one of the following options for a database solution to facilitate inter-PSAP communications in Europe:

* Option A: My organisation would prefer that the database solution to facilitate inter-PSAP communications, and participation in that database by EU Member States, be mandated by EU legislation so that inter-PSAP communications is possible between PSAPs in all EU Member States.
* Option B: My organisation would prefer that the database solution, and participation in it, remains on a voluntary basis as per the CEPT/ECC proposal.
* Option C: My organisation has no preference.

### Summary of responses to the second questionnaire

The responses can be summarised as follows:

* Option A (mandated approach): 13 respondents from administrations or emergency services organisations in 11 countries.
* Option B (voluntary approach): 6 responses from administrations or emergency services organisations in 6 countries.
* Option C (no preference): 4 responses from administrations or emergency services organisations in 4 countries.

Question 2 asked: If you answered A to Question 1 above and in the event that EU Legislation is not forthcoming and considering that 20 CEPT member countries are not in the EU, would you support a voluntary solution hosted by ECO?

Responses were:

* Option A: Yes (would join voluntary approach): 9 responses from 9 countries[[4]](#footnote-5).
* Option B: No (would not join voluntary approach): 4 responses from 2 countries (Spain and Germany).
* No response to this question was received by AKOS (Slovenia).

## Summary and analysis of responses from both questionnaires

Throughout this section, it should be recognised that responses have been received from 23 out of 48 CEPT countries, hence terms such as ‘majority’ represent the majority of those that responded to the questionnaires, and may not necessarily reflect the views of the majority of CEPT members.

### Areas of agreement or general consensus

The questionnaires have established that the majority of organisations and countries that responded are, in principle, supportive of the proposal for the ECO to assume responsibility for the operation of PSAP-DIR and indicated that they would be willing to participate in such a scheme. Many responses agreed that PSAP-DIR would offer advantages to PSAPs for a number of relevant use cases. Very few respondents believed (Question 8) that the operation of PSAP-DIR would interfere negatively with the operation of PSAPs.

Some respondents expressed concern that PSAP-DIR could interfere with existing and well-functioning bilateral agreements between countries. For the avoidance of doubt, the proposal set out in this report would not seek to replace such existing processes. Rather it is envisaged to be an additional resource available to PSAPs to take advantage of when necessary.

Reflecting the widespread views of respondents, it is proposed that responsibility to ensure that information in PSAP-DIR is accurate and up to date lies exclusively with a designated focal PSAP in each country.

PSAP-DIR is proposed to be used by PSAPs to respond to a variety of use cases. There were significant diverging views regarding the case of Third Party Services (TPS) eCall. Having carefully considered the responses, the ECC is of the view that TPS eCall is not an appropriate use case for PSAP-DIR to cater for and TPS eCall service providers will not be granted access to PSAP-DIR. In the future, if all participating PSAPs were in agreement, this situation could be reviewed.

The existence of PSAP-DIR should not allow providers of multi-site corporate networks or nomadic VoIP services to avoid their current statutory obligations for the conveyance and routing of emergency calls to the correct PSAP.

### Areas for which further analysis may be required

The number of contact numbers per country remains an open question. A single contact number that is able to route to fall-back PSAPs for resilience purposes could be achieved or a small number of contacts could be available. The specific approach would need to be agreed between the emergency services organisations if PSAP-DIR is implemented by the ECO.

Moreover, questions and issues regarding the security of, and access to the contact information contained in PSAP-DIR generated a mixture of responses. While it was generally accepted that PSAPs would be responsible for the access to and input of contact information, the specific requirements (regarding the security levels, the different levels of access privileges etc.) would need to be determined, after consultation with emergency services organisations, during the implementation stage.

Furthermore, many of the practical and operational issues raised such as how to deal with SIM-less, hoax and malicious calls is a matter for the involved PSAPs. Such matters are not anticipated to affect the viability PSAP-DIR. PSAP-DIR could contain additional information on whether SIM-less calls or emergency calls without CLI are allowed in a given country.

However, a key issue raised was whether the PSAP-DIR facility should be mandated or voluntary for EU Member States. Four respondents from two countries (Spain (3) and Germany (1)) have called for a mandated approach and have indicated that they would not support a voluntary scheme. Others have either supported a voluntary approach or, if supporting a mandated approach, would still participate in a voluntary scheme. It should be noted that the proposal from CEPT/ECC is for a voluntary approach and it does not have any legal basis for mandating any requirements on CEPT countries. Mandating any such solution for EU Member States is a matter for the EU.

The key regulatory and legal issues that have been raised in response to the questionnaires as well as considerations as to the operational arrangements for PSAP-DIR are specifically discussed in the following sections of this feasibility report.

# Current EENA Directory

## History

In 2009, EENA was contacted by several emergency services representatives in Europe requesting a directory containing internationally diallable E.164 telephone numbers to facilitate contact between European PSAPs when a need arises. EENA gathered the information together to form a directory and, in 2012, it published an operational document[[5]](#footnote-6) which provides a framework for the contents of the directory, consolidation of that content and secure access to it. The document also defines a basic set of protocols for the PSAPs using the directory and the validation and verification methods used.

## Contents of the EENA Directory

The EENA directory is currently in the form of an MS Excel spreadsheet containing relevant contact information for a single primary PSAP in each participating country. Each country is invited to select one primary PSAP. The document states that "EENA does not select a PSAP representing a country or does it wait for an official country selection to be done. However, official national authorities’ mandates are highly appreciated. In the absence of such a mandate, the primary PSAP in a country is determined by consensus between EENA and the country’s PSAPs applying".

In some countries, several PSAPs have provided their numbers. However, it is often impossible for a PSAP operative based in another country to know which PSAPs is responsible for a specific incident in a specific area.

In the event that the primary PSAP does not respond a secondary PSAP may be contacted. Every PSAP wishing to access the directory must join a secondary PSAP directory. A secondary PSAP may be contacted if the primary PSAP in a particular country does not respond.

The current directory contains the following information:

* Country.
* Name of the PSAP.
* PSAP's internationally diallable E.164 geographic/fixed line telephone numbers.
* Description of the area traditionally covered by the PSAP.
* Description of the area potentially covered by the PSAP through contacts with other PSAPs.

Table 1 below provides a snapshot of the information contained in the EENA directory. This is for illustrative purposes with confidential information redacted.

Table 1: Example of information stored in current EENA Directory



## Conditions to be fulfilled by Designated Focal PSAPs

The EENA document states that "Primary PSAPs must fulfil the following conditions:

* They must cover the entire country’s territory or can transfer calls/data to all the PSAPs in its country (directly or indirectly).
* They must ensure a 24/7 service in English.
* They commit to inform and train their call-takers/dispatchers to manage calls using the EENA directory."

## Access to the Directory and Security

The EENA document states that "information contained in the database is confidential in nature and is only accessible by PSAPs and relevant national authorities (e.g. competent ministries, NRAs etc.) who have signed a consent form. Access is restricted with a password that is updated every 6 months. The updated database is sent to all primary and secondary PSAPs 4 times a year unless there are relevant changes in between.

## Responsibility and Liability

Section 10 of the EENA document states that "the EENA cannot be held responsible or liable for any misuse of the EENA PSAPs Database nor any damage caused. The EENA and the PSAPs accessing the database commit not to share the database with any third parties. EENA and the PSAP accessing the database reserve the right to take legal action."

# Remit of CEPT/ ECC in Emergency Services Communications

The ECC, one of three autonomous business committees of the CEPT, is responsible for developing common policies and regulations in electronic communications and harmonising spectrum use as well as European coordination and preparation for meetings in the Radiocommunication Sector of the International Telecommunication Union.

On spectrum-related matters, the ECC works closely with other European agencies to establish harmonised frequency bands for Public Protection and Disaster Relief (PPDR) services and applications. In the area of emergency services, it has harmonised frequency bands to be designated for the Direct Mode Operation (DMO) ([ERC Decision (01)19](http://www.erodocdb.dk/Docs/doc98/official/pdf/DEC0119.PDF)) and for Air-Ground-Air (AGA) ([ECC Decision (06)05](http://www.erodocdb.dk/Docs/doc98/official/pdf/ECCDEC0605.PDF)) operation of the digital land mobile systems for the emergency services. It has to be considered that spectrum harmonisation is coordinated at a European level while spectrum assignment and emergency services management are performed at a national level.

On non-spectrum-related matters, the ECC has published [ECC Report 225](http://www.erodocdb.dk/Docs/doc98/official/pdf/ECCREP225.PDF) on establishing criteria for the accuracy and reliability of the caller location information in support of emergency services and [ECC Report 255](http://www.erodocdb.dk/doks/filedownload.aspx?fileid=4294&fileurl=http://www.erodocdb.dk/Docs/doc98/official/pdf/ECCREP255.PDF) on the use of Assisted-Global Navigation Satellite System (A-GNSS) capabilities to improve caller location information for emergency calls originating on mobile devices. In addition, the ECC published several other reports related to emergency services communications[[6]](#footnote-7).

As far back as 1972, the CEPT also published [CEPT Recommendation T/ SF1](http://www.erodocdb.dk/Docs/doc98/official/pdf/REC-TSF1.PDF) on long term standardisation of national numbering plans. This deliverable was the first initiative that attempted to harmonise the 3-digit short code 112 for accessing emergency services in all countries in Europe.

Considering the different cases of emergency communication, it is important to note that there is no legal requirement for any CEPT administration to organise, on national or European level, inter-PSAP communications via telephone networks. This special case of emergency communications is not a telecommunication regulation subject. PSAP-DIR would be provided by CEPT on a voluntary basis and would be based on voluntary participation by PSAPs.

## ECC Strategic Plan 2015-2020

The [ECC Strategic Plan for the period 2015-2020](http://cept.org/files/1051/ECC/Who%20are%20we/ECC%20Strategic%20plan/ECC%20Strategic%20Plan%202015-2020%20web-ready.pdf) was adopted at the 38th ECC Plenary in Montreux, Switzerland on 28 November 2014. The strategic plan sets an action for the ECC's Working Group on Numbering and Networks (WG NaN) to "study relevant aspects of emergency services communications and provide support and advice to European emergency services stakeholders where appropriate". The strategic plan also states that the ECC "shall endeavour to foster a spirit of cooperation and collaboration with all stakeholders" and that it "should also be a focal point in Europe for providing, maintaining and exchanging information on electronic communication".

## WG NaN Terms of Reference

The current terms of reference for WG NaN were adopted in Jūrmala, Latvia on 28 April 2016 and approved by the ECC in Stockholm, Sweden on 17 June 2016. In relation to the scope of the working group's activities in emergency services, the terms of reference state that WG NaN shall "study technical and regulatory aspects of emergency services communications and cooperate with European emergency services stakeholders on regulatory matters where appropriate".

## Role of the ECO

The ECO, the permanent office of the CEPT, provides advice and support to CEPT, and in particular the ECC, to help it to develop and deliver its policies and decisions in an effective and transparent way. Its core duties are to provide a European centre of expertise in electronic communications, to contribute to the work of the three CEPT committees and to manage the CEPT's day-to-day activities. While the ECC develops policies, the ECO supports their implementation by providing a range of specialist online information tools and systems. Current tools include [EFIS](http://www.cept.org/eco/eco-tools-and-services/efis-eco-frequency-information-system), [SEAMCAT](http://www.cept.org/eco/eco-tools-and-services/seamcat-spectrum-engineering-advanced-monte-carlo-analysis-tool/) and the [ECC 700 MHz Coordination Information Repository](http://www.cept.org/ecc/tools-and-services/ecc-700-mhz-coordination-information-repository/). These tools are related to spectrum-related subjects as one of the core competences of ECC. The ECO considers that it has the necessary competence and technical expertise to host PSAP-DIR if the ECC decides to proceed with the project. The ECO's governing body, the ECO Council, would have to agree to commit financial and human resources for the development and ongoing maintenance of PSAP-DIR. The projected costs will be considered internally in conjunction with the findings of this Feasibility Study.

## Arguments for and against PSAP-DIR

One could argue that PSAP-DIR is a relevant activity for the ECC to be involved in if you consider the actions set out in the ECC Strategic Plan and the terms of reference of WG NaN specifically relating to cooperating with European emergency services stakeholders.

Equally one could argue that cooperating with European emergency services stakeholders should be restricted to relevant, technical and regulatory aspects of emergency services communications. While PSAP-DIR facilitates electronic communications between PSAPs in different European countries, can it be categorised as a relevant, technical or regulatory aspect that the ECC should be involved in?

The organisation of the emergency services is of the exclusive competence of each individual CEPT member country. This principle is also respected in Article 26 of the Universal Service Directive (USD) for CEPT countries which are also member states of the EU. It could be argued, specifically for CEPT countries not participating in PSAP-DIR, that PSAP-DIR effectively introduces a new type of emergency call, which is a "transnational" emergency call and that this could therefore be regarded as interfering in the organisation of emergency services.

However, it could be argued that the PSAP-DIR does not introduce a new type of emergency call but merely introduces a directory for participating PSAPs to contact each other when the need arises.

There is a variety of national jurisdictional arrangements in the field of emergency calls which means that not all CEPT administrations have competence or responsibility for emergency services communications at the national level. Nevertheless, CEPT countries that are in the EU/EEA have responsibilities under the USD to ensure that end users are able to call the emergency services by using the single European emergency number 112. EU/EEA Member States must also ensure that calls to 112 are "appropriately answered and handled in the manner best suited to the national organisation of emergency systems".

PSAP-DIR as proposed will be a lot less challenging to implement for countries which have a centralised organisation of emergency services. CEPT countries with a fully decentralised organisation will face challenges because the regional responsibilities of the PSAPs in those countries will not be reflected in the structure of PSAP-DIR. This means that these countries are effectively excluded from participating in PSAP-DIR unless they can agree to nominate a designated focal PSAP that would have the knowledge and technical means to distribute calls to the most appropriate PSAP at the national level.

Paragraph 7 of USD article 26 outlines that "In order to ensure effective access to “112” services in the Member States, the Commission, having consulted BEREC, may adopt technical implementing measures." But when approached by EENA concerning the hosting of PSAP-DIR the European Commission replied that it did not follow up on EENA's request because there is no such competence bestowed on it through EU legislation.

Finally, CEPT was the first organisation to harmonise 112 as the 3-digit short code for emergency calling. This has provided European citizens with a common number to make an emergency call no matter where they are in Europe and has undoubtedly been of huge benefit over the years to emergency callers. Calls to 112 are originated and terminated nationally, but there are isolated incidents where this may not be the most appropriate arrangement, and PSAPs in different countries may need to cooperate in order to provide adequate emergency assistance. One could argue that this is a valid reason for CEPT/ECC to provide support to help improve cooperation and coordination between PSAPs in Europe. Equally, one could also argue that it is a matter for the relevant national and EU authorities and not a matter for the CEPT/ECC to be involved in.

There is no legal basis for CEPT/ECO to host such a database or is there any legal basis preventing it from hosting such a database. The ECC Plenary will decide if it is an appropriate activity for it to be involved in.

# Technical and Administrative Considerations for PSAP-DIR

The information contained in this chapter represents an initial proposal of the ECC and the ECO regarding how PSAP-DIR could be implemented. If the ECC decided to proceed with the project and the ECO Council approved the commitment of financial and human resources, a more in-depth consideration by the ECC and ECO, following consultation with relevant stakeholders, would be necessary.

EENA provides the current directory in the form of a password protected MS Excel spreadsheet. A more robust solution could be implemented which enhances security and access while placing responsibility for the accuracy of the contact information in the directory with each participating PSAP. A proposed structure of for the directory is contained in Figure 1 below.



Figure 1: Proposed Structure of PSAP-DIR

If the project was to proceed, consultation would be required with the relevant stakeholders regarding the technical structure and interfaces as well as the protocols for participating in and accessing the directory. A technical maintenance group could be established to provide input on:

An initial set of technical requirements for PSAP-DIR.

Protocols for access and use of PSAP-DIR.

The scope of use (use cases).

The scope of participation (eligible users).

The wording of the user agreements.

Any issues raised by the users, CEPT/ECC administrations or ECO related to the functioning of the PSAP-DIR.

The training requirements for users.

The technical maintenance group would provide advice on these and other issues but the ECC and ECO within their respective roles would have the final decision on the implementation and maintenance of PSAP-DIR.

## PSAP-DIR Participation

There are currently 24 PSAP operators from 19 countries participating in the EENA directory, and this could, in theory, rise to 48 countries with the participation of PSAP operators from all current CEPT countries. As well as a having a single focal PSAP for each country, there may be a need to have an entry for one designated back-up PSAP for contingency purposes. Therefore, it is possible that PSAP-DIR could, in theory, contain contact details for approximately 100 different entities. This would not be a complex structure, and the ECC would envisage that real-time updates would not be frequent.

## Fields/Columns in PSAP-DIR

The fields contained in PSAP-DIR would need to be discussed with the technical maintenance group but the following table provides a preliminary list of potential directory fields.

Table 2: Preliminary list of potential directory fields

|  |  |
| --- | --- |
| Field | Description |
| Country | Country for which PSAP operators have provided contact information for a designated focal PSAP |
| PSAP Type | Primary or Backup |
| PSAP name | The name of the designated focal PSAP  |
| PSAP address | The address of the designated focal PSAP |
| 24 hour Contact telephone number | A internationally diallable E.164 telephone number in the format + <country code> <area code> <subscriber number>. This is the number that other PSAPs would use to contact the designated focal PSAP in a particular country. The number needs to be available 24 hours per day.  |
| Contact e-mail address | A dedicated email address based on a standardised naming convention to allow other PSAPs to send information, documents, attachments etc. relating to an emergency incident. The format could be <country>112@<localdomain> |
| Website Address | A website address for the focal PSAP if available. This may be useful for the provision of background information. |
| Languages spoken | A list of languages spoken by operatives working in the focal PSAP |
| Primary contact point | Click here for details (Link to name, address, email, telephone no, position) |
| Secondary contact point | Click here for details (Link to name, address, email, telephone no, position) |
| Last update | The time and date of the last update including details of the person who made the update |
| Other/Future Use |  |

Users of PSAP-DIR would have a membership profile similar to the membership profile that ECC group members have today. Some members, such as primary contact points, would have greater access privileges to allow them to update contact information for their respective PSAP, to approve membership requests or to download offline versions. Offline versions may be necessary for some PSAPs who wish to store a local copy of the directory in their PSAP operational systems.

### Data Entry and Maintenance

The designated contact point within the focal PSAP would have responsibility for the initial directory entry and ongoing updates as required. The ECO would not accept any responsibility or liability for the accuracy of the information contained in PSAP-DIR, and this would be stipulated in the conditions of use. Each time the directory is updated, every user of the directory would receive an update notification similar to the following:

"Dear <salutation><Firstname><Lastname>,

Please be advised that the information contained in PSAP-DIR for <country> has been updated by <designated contact point>. If you use an offline version of PSAP-DIR for day-to-day operations, then please update it now or at your earliest convenience.

The ECO, as PSAP-DIR host, does not accept any responsibility or liability for the accuracy of the information contained in PSAP-DIR. The accuracy of the contact information for a designated PSAP is the sole responsibility of that designated PSAP.

Secure access to PSAP-DIR is available at <PSAP-DIR URI>

Kind regards

PSAP-DIR Administrator, ECO"

### Protocol for Use and Contingency Plans

If the project was to proceed, it is recommended that the PSAP user community access PSAP-DIR using the online interface at all times. This approach ensures that users can always be sure that the information obtained from PSAP-DIR is up-to-date, and it reduces the risk of unauthorised access to the information contained therein. However, as the provision of emergency services is an operation that needs to be available 24 hours per day, 365 days per year, a contingency needs to be put in place in the rare event that access to PSAP-DIR is unavailable. The ECO cannot guarantee the gold standard of "five nines" availability (i.e. 99.999% availability) where the downtime is less than 5.26 minutes per year. The cost of this would be prohibitive. Therefore, PSAP-DIR would be designed to allow for an offline version of PSAP-DIR to be generated.

The user interface will allow a designated contact point to generate an offline copy. This offline copy can be made available as a.pdf file containing the information. This file will be "watermarked" with a unique reference number so that any subsequent sharing of the document which could cause a security breach can be traced back to the individual who created the offline copy. In this case, an authentication step would be required before downloading. A user must log in to PSAP-DIR and click a button to request a pdf version. An agreement would then be displayed that waives the ECO from any responsibility or liability for any breach of security, damage or loss arising from the creation of an offline version of PSAP-DIR. The user would be required to accept the terms of the agreement before proceeding. The user would then be asked to enter their username and password and click OK as acceptance of the terms and conditions. The screen would then display a message similar to the following:

"Dear <salutation><Firstname ><Lastname>,

You have generated a pdf copy of PSAP-DIR. You will shortly receive an email with a secure link from which you can download the file. Given the sensitive nature of the information contained in this file, please consider it as highly confidential and do not forward it to any other party. The ECO accepts no responsibility or liability for any breach of security, damage or loss arising from the creation, downloading, transferring or forwarding of this file.

Kind regards

PSAP-DIR Administrator"

For participating PSAPs with their own purpose-built operational systems, arrangements could be made, upon request, to the ECO for a copy of the data to be pushed directly to their internal systems. This solution would require further consideration.

### Membership Management - Designated Focal PSAP Contact Points

If the PSAPs in a particular country want to participate in PSAP-DIR, they will need to notify the PSAP-DIR administrator at the ECO. The ECO would need to be informed that a PSAP has been designated as the focal PSAP for that country and the name, address and contact information of a designated contact point will need to be provided to the ECO. The designation of a focal PSAP for a particular country would be a national matter and the ECO would liaise with the relevant CEPT administration regarding any applications received from PSAPs.

The ECO would then make contact with the designated contact point and send a formal agreement that will need to be completed and returned with a signature and supporting documentation. The purpose of the agreement is to provide clarity on the roles and responsibilities of both parties to the agreement (the designated focal PSAP and the ECO as PSAP-DIR administrator) and to formally acknowledge those roles and responsibilities. The main issues that the agreement seeks to provide clarity on are:

* That the designated contact point will acknowledge that it is responsible for initially entering and then maintaining its own PSAP-DIR entry for the duration of the agreement and that it accepts responsibility for the accuracy of the information contained in PSAP-DIR for its own entry.
* That the ECO will acknowledge that it is responsible for hosting, securing and maintaining PSAP-DIR and providing a secure interface for access to PSAP-DIR for the user community. The agreement will also contain an explicit statement that the ECO will not accept any responsibility for the accuracy of the data contained in PSAP-DIR.
* Upon receipt of the signed agreement, the ECO will then provide instructions on how to set up a user profile. When the user profile is set up, the designated contact point will receive an email to activate the account. Upon activation the designated contact point will be provided with a link to the PSAP-DIR website where they can request membership of PSAP-DIR. Upon receipt of the membership request, the ECO will accept the membership request and the designated contact point will be provided with another link allowing a username and password to be set up. Access to PSAP-DIR will then be possible and information for the designated focal PSAP for which they have responsibility can be entered.

During the public consultation, Germany made the following comment "It is not suitable to grant the access to the database only for users that have also filled the database because the budget for the operation of the database would be granted by the council and therefore paid by all CEPT administrations according to their distribution key. So it would not be possible to exclude countries from the access, even if they had not filled the database operated on voluntary basis." This issue was not addressed in the feasibility report.

### Membership Management - PSAP operatives

* Any PSAP operative from a participating CEPT country should be able to use PSAP-DIR and the ECO would require that every PSAP operative has a unique user profile. This would allow the ECO, as PSAP-DIR administrator, to maintain an audit trail of all PSAP-DIR interactions.
* In order to gain access to PSAP-DIR, a PSAP operative would need to go to the PSAP-DIR website, set up a user profile and request access. The access request would be sent to the designated focal PSAP primary contact point in the same country, and the focal PSAP contact point would have discretion on whether or not to grant access. The ECO will accept no responsibility for such decisions.
* When a membership request is accepted, the PSAP operative will receive an email with an activation link. Before activating the account, the PSAP operative will be required to accept a user agreement that sets out the roles and responsibilities of the ECO, as PSAP-DIR administrator, and the PSAP operative as a PSAP-DIR user. When the agreement is accepted, the account can be activated. The ECO and the primary contact point in the relevant country will then receive an email acknowledging this.

# Legal structure

Chapter 6 provided a preliminary overview of how PSAP-DIR could be structured and accessed. The directory and associated access procedures should, by design, seek to protect the ECO from any liability arising out of any external misuse or breach of confidentiality. As PSAP-DIR host, the ECO would have a responsibility for the operation, maintenance, availability and security of PSAP-DIR. This chapter identifies the legal basis for PSAP-DIR and the potential elements in a contract.

## Contractual basis

The legal basis and framework for the rights and obligations for the use of PSAP-DIR would be the underlying contracts between ECO and the PSAP-DIR users (PSAP operatives and designated focal PSAPs). These contracts would consist of the individual legal expressions of intent such as of the offer of a promise and the subsequent acceptance, which if aligned forms a contract. Practically speaking, the offer would be the declaration of PSAP-DIR terms and conditions presented to the user and the acceptance would be the signing or clicking of the acceptance of these terms and conditions.

PSAP-DIR would be a tool that could be used by PSAPs in 48 CEPT countries. Therefore, there is no single national statute or regulation that would stipulate the information security obligations of either the directory host or the contracting parties. The users must accept the level of security etc. described in the contract. The contract could e.g. describe a "reasonable" and "appropriate" security level to protect from unauthorised access to PSAP-DIR. The same legal foundation would impose a duty of care to PSAP-DIR users not to disclose passwords or protected information to third parties. It will be up to the users of PSAP-DIR to decide if they want to conclude the contract and thereby accept the described level of security or not.

With regards to the level of security it is uncommon that any legal requirement would dictate what measures are required to achieve "reasonable" and "appropriate" security. In the case of PSAP-DIR, the ECO, as directory host, would need to identify any risks and assess those risks and implement appropriate security measures in response to those risks. Any security measures would have to be effectively implemented and updated in response to new developments. ECC considers that the PSAP-DIR has limited exposure to competition regulation. The directory will be provided on a voluntary and contractual basis. There are no barriers for other entities to also create such a directory and provide extra services, access from third parties etc. The current service is offered free of charge by EENA which is considered as a non-profit organisation. The ECO would also host PSAP-DIR without a commercial interest. ECC assumes that it is very unlikely that a commercial service will appear on the market to offer this kind of service to PSAPs. There have been no issues in this concern, related to the other databases or services that ECO provides.

## Elements in the contract

There would be two contracts. The first contract would be between the ECO and the designated focal PSAP, and the second contract would be between ECO and the user. Some contractual elements described in this section apply to the first only and some elements apply to both. These include:

* An assertion that the signatory to the contract has, after consultation with the relevant authorities at the national level, been designated as the designated focal PSAP for the relevant country and commits to providing and maintaining its contact information in PSAP-DIR. (Focal PSAPs)
* A commitment to use the directory in accordance with the terms and condition. (Both)
* A commitment to train relevant call takers and dispatchers in the use of the directory. (Focal PSAPs)
* A commitment to make sure that call takers recognise the calls made using PSAP-DIR to ensure an appropriate response and a full time availability of English speaking call-takers when contacted by other PSAPs. (Focal PSAPs)
* A clause that clearly defines that the ECO cannot be held responsible or liable for any misuse of PSAP-DIR nor any damages, direct or indirect, caused by incorrect data, breach of security, damage or loss arising from the creation, downloading, transferring or forwarding of offline versions of PSAP-DIR. (Both)
* A commitment to not to share access to PSAP-DIR or information from PSAP-DIR with any unauthorised third parties. (Both)
* The contract should also regulate the situation where ECO chooses to terminate the hosting of the directory. If the ECO decided to terminate PSAP-DIR it should provide due notice to all registered PSAPs thereby supporting them to make alternative arrangements (for example by transferring the responsibility for the hosting of the service back to EENA).
* The contract should also regulate what happens in case of a dispute. The contract should also include the correct jurisdiction and venue for any claims. (Focal PSAPs)

# Risk assessment

The following chapter identifies potential risks, assesses the probability and impact/consequences of those risks, and proposes appropriate measures to mitigate them.

The risks concerning the PSAP-DIR can be divided into risk of legal actions, physical damage and natural events, loss of essential services, unauthorised access to an online version of the directory, technical failure, or unauthorised access to an offline version of the directory.

The following high level assessment will use the qualitative attributes "Low", "Medium" and "High" to describe the likelihood of the risk occurring and the magnitude of the potential consequences.

## Risk of legal actions against ECO For Alleged Failure To Fulfil Contractual Obligations

### Description

Generally, contractual disputes occur when there is an alleged failure to fulfil contractual obligations. In other words, one or both parties claim that there is a difference between what is contracted and what is delivered.

### Probability and impact

The PSAP-DIR is based on a voluntary provision of information. The notion behind ECO hosting the directory is also voluntary. There is no financial gain for ECO in hosting the directory. This reduces the risk of litigation being used as method for solving possible disputes. It is not likely that any conflict stemming from the use of the PSAP-DIR would be put to legal proceedings without first going through several attempts by the involved parties to resolve the situation.

The users of PSAP-DIR will be responsible of the correctness of the data. This limits the risk of ECO being held liable for any incorrect data. There will also be contractual elements that reduce the scope of the legal promise that ECO commits itself to. This again reduces the legal motivation to litigate.

Finally, there have not been any legal actions against EENA as the current directory host. This may be considered to give empirical arguments to support the assumption that the probability of future legal action against ECO is low.

This leaves other incentives to sue such as intent to cause reputational harm to ECO. The threshold to summit a claim based on such motivations is high.

The impact of legal actions against ECO must be assessed on the basis of the contract. The contract will stipulate that ECO cannot be held responsible or liable for any misuse of PSAP-DIR nor any damage caused by incorrect data, breach of security, damage or loss arising from the creation, downloading, transferring or forwarding of offline versions of PSAP-DIR. Should a legal action occur, despite the "disclaimers", the risk for financial loss for ECO would be low. The ECO would however have to appear in court and devote time to the preparation of court proceedings. Legal counsel would have to be sought and would invariably include a level of cost. Furthermore, legal action could constitute an indirect threat to the directory, since the directory host may hesitate to commence or continue with the directory service if legal actions are successful.

* Probability of legal actions against ECO: Low
* Impact of legal actions against ECO: Low/Medium

### Mitigating measures

As mentioned above, the disclaimers will reduce the risk of potential legal proceedings. The wording of the disclaimers in the contract will be important in order to reduce the motivation for legal proceedings in case of a conflict.

Focusing on providing the PSAP-DIR users with sufficient information and assistance will also mitigate the risk of legal actions against ECO. The involvement of PSAP stakeholders in the establishment of the directory and its framework will also mitigate this risk.

In order to reduce the risk and costs of court proceedings, it is possible for the parties to agree to alternatives to court proceedings. This can be done by introducing a contractual clause stipulating the use of an Alternative Dispute Resolution Process (ADRP). The terms could state that any disputes should be brought to an appropriate body for mediation. If the dispute is not solved there, the case could be solved through an extrajudicial dispute resolution process. Such a clause would limit the risk of regular court proceedings. The clause could include a duty of confidentiality to reduce the risk of reputational damage. The arbitration procedure should be based on the principles set out in the ECO Convention - Annex B[[7]](#footnote-8). Specifically, paragraph 6 of Annex B would become part of the agreement which would require each party involved in a dispute to bear their own costs for the ADRP.

Both in case of an ADRP clause and in the case of court proceedings, Copenhagen Denmark should be chosen in the contract as the agreed jurisdiction and venue. This will reduce costs related to any proceedings and increase legal transparency and predictability for ECO.

## Physical Damage caused by Natural Events

### Description of risk

Physical damage to PSAP-DIR can be the result of a fire, water leakage, major accidents or other incidents. Natural events can be environmental incidents such as flooding or earthquakes.

The seismic activity in the region is very low, so the likelihood of earthquakes in Copenhagen is low.

### Probability and impact

The risk of flooding is similar to many other coastal cities, and it can be regarded as medium, but increasing due to climate change. The threat of flooding is under focus from relevant Danish authorities, and in city planning. Some parks in Copenhagen, such as the Tåsinge Plads, can turn into ponds with underground storage tanks. To mitigate any impact for PSAP-DIR due to physical damage or natural events such as flooding, the ECO already has standard procedures in place for backing up its data and the backups are stored offsite.

Furthermore, the ECO is currently in the process of implementing offsite redundancy for all of its IT systems and applications as an added defence to facilitate ongoing operations in the event of physical damage to its onsite IT infrastructure. Considering such precautions, the occurrence of a flooding incident in Copenhagen is not likely to cause any major disruption for the ECO's IT infrastructure.

* Probability of physical damage caused by natural events: Low
* Impact of physical damage caused by natural events: Low

### Mitigating measures

Since the directory will only consist of contact information from a maximum of 48 countries, the amount of data in the directory will be limited. It will be fairly easy to restore the entire directory manually based on a backup copy of the directory. In a worst case scenario ECO, where also the remote stored backup tape has been destroyed, ECO would have to notify each participating PSAP to repopulate their contact information in the central directory.

## Unauthorised access to The online version of PSAP-DIR

### Description of risk

The unauthorised access to PSAP-DIR represents a deliberate compromise of information and may manifest itself in many ways, e.g. as interception of signals and communication between ECO equipment or as physical theft of equipment, remote spying, eavesdropping or hacking.

### Probability and impact

The probability of unauthorised access and use must be ascertained taken into consideration the motivation of the origin of the risk/threat to conduct the related actions. The PSAP-DIR has a limited financial importance so the risk of unauthorised use due to the prospect of financial gain, is low.

The PSAP community consists of many individuals so that other motivations such as rebellion, revenge or media coverage should not be ruled out, but also not very probable. PSAPs already have confidential E.164 internationally diallable numbers for example for contact with police, ambulance, fire brigade, coast guard and PSAPs in other countries with whom they have bilateral agreements. This implies that PSAP personnel already have relevant experience, which reduces the probability of the risk event occurring. The access to the directory will be password protected and have appropriate security controls.

The ECO's IT infrastructure is reasonably and appropriately secured and it monitors its arrangements on an ongoing basis. If contact information for all European PSAPs became public through a security breach, it would mean that ECO would have to evaluate its security measures and PSAPs would have to be notified to change the confidential telephone numbers provided in PSAP-DIR.

* Probability of unauthorised access to the online version of PSAP-DIR: Low
* The impact of unauthorised access to the online version of PSAP-DIR: Medium

### Mitigating measures

The ECO, as PSAP-DIR host, would assume responsibility for securing access to PSAP-DIR as part of its IT infrastructure. The ECO hosts a number of different IT tools and services and manages membership for all registered CEPT users on its IT infrastructure. The ECO has implemented technologies and procedures to ensure appropriate levels of security to protect from unauthorised access such as hacking. The ECO will ensure that the PSAP-DIR data is stored in an encrypted format, and that the latest security updates are applied to its firewall in accordance with its IT security policies.

If the ECO became aware of a security breach, it could immediately notify all participating PSAPs and a procedure should be invoked to block access to and then change all contact information with immediate effect.

If such an event arose, an investigation would need to be carried out to determine how the breach occurred, which (if any) account was used and how the account details were compromised. For example, if a user account was not deleted following the retirement, resignation or dismissal of a PSAP employee or if the username and password of a valid account was shared or made publicly available in some way. A procedure for deleting the accounts of former PSAP employees would need to be implemented. This is to prevent the unauthorised copying of the PSAP-DIR. The responsibility for notifying the PSAP-DIR administrator to delete a user account would rest with the relevant PSAP.

## Technical failure

### Description of risk

Technical failures can consist of equipment or software failures or malfunctions resulting in loss of information or unavailability of PSAP-DIR.

### Probability and impact

The ECO's raison d'etre is to support the work of the CEPT and its business committees. Its IT infrastructure, tools and services are vital components of that support. The ECO therefore has appropriate disaster recovery plans in place so that it can maintain its operations in the event of unforeseen circumstances.

The ECO would consider the impact of corruption, loss or unavailability of PSAP-DIR due to technical failure, as low. Apart from the ECO's own contingency plans, there would be an offline version of PSAP-DIR available to the participating PSAPs in the event that PSAP-DIR is inaccessible or unavailable. There would be one limitation which is that updates to PSAP-DIR would not be available during downtime. However, given that the contact information for a PSAP is quite static in nature, the impact of this limitation is extremely low and a process for manual updates could be implemented if the downtime duration was longer than anticipated

* Probability of loss or unavailability of PSAP-DIR due to technical failure: Low
* Impact of loss or unavailability of PSAP-DIR due to technical failure: Low

### Mitigating measures

In order to mitigate the probability and impacts of technical failure, the ECO, as directory host, would assume responsibility for the maintenance of the directory and underlying IT infrastructure. The ECO already has standard procedures in place for backing up its data and the backups are stored offsite.

Also, the users of PSAP-DIR will be encouraged to download copies of the PSAP-DIR for use as backup in case of technical failure. This encouragement will be guided with cautious remarks on confidentiality.

## Unauthorised Access to an Offline Version of PSAP-DIR

### Description of risk

The ECO, as PSAP-DIR host, would make available a facility to download an offline version of PSAP-DIR. This facility serves two purposes. Firstly, to facilitate those PSAPs who wish to upload a copy of PSAP-DIR to their bespoke operational systems and, secondly, to ensure that PSAP-DIR can be used in the event that online access to PSAP-DIR is restricted or unavailable.

However, the existence of an opportunity to download the directory implies an increased risk of unauthorised access to the downloaded material.

### Probability and Impact

The impact of unauthorised access to an offline version of PSAP-DIR is considered to be the same as the impact of unauthorised access to the online system. However, the probability is considered to be higher as central control is lost and the responsibility for maintaining security and confidentiality is transferred to any authorised user who creates an offline version.

* Probability of unauthorised access to an offline version of PSAP-DIR: Medium
* Impact of unauthorised access to an offline version of PSAP-DIR: Medium

### Mitigating measures

An audit trail would be built-in to the system that could be used to trace the account used to create the offline version. According to the terms and conditions, the responsibility and liability for confidentiality and security will be transferred to the PSAP-DIR user when an offline version of PSAP-DIR is generated. In the case that an offline version is provided to an external third party (or made public) with deliberate or malicious intent, then the ECO could block a user for using the PSAP-DIR.

Furthermore, any designated contact point wishing to create an offline version would have to accept the terms and conditions of a user agreement which will transfer responsibility and liability for confidentiality and security to that party.

## Political and reputational risk - National Level and ECO

### Description

If the ECC Plenary asks ECO to proceed with PSAP-DIR, it would be provided on a voluntary basis and participation in and use of PSAP-DIR would also be voluntary. Most CEPT administrations do not have formal responsibility for the provision of emergency services in their respective countries, and CEPT/ECC has no legal basis to mandate its members or PSAPs that are not members to participate. Therefore, the creation and use of PSAP-DIR would not be governed by any formal requirements and would therefore not sit directly within existing regulatory frameworks. While this may not present any issues when the use of the directory runs effectively, should issues arise at some point in the future, the basis and authority of the directory may be called in to question. There may be a reputational risk for ECC that could undermine the work that ECC undertakes in this area and this could limit the continued maintenance and development of PSAP-DIR in the future.

At the national level, PSAP-DIR may represent a political risk if its basis and authority were called into question at some point in the future or if using (or not using) PSAP-DIR resulted in an isolated incident where accountability came in to question. For example, if it was considered, in the context of an isolated incident, that the use of PSAP-DIR resulted in a negative consequence for a country or if not using PSAP-DIR resulted in a negative consequence. While this point is speculative it is not beyond the realms of possibility that an isolated incident could cause such a situation to materialise.

It could be argued that there is also a reputational risk for ECO and ECC if it was decided to stop providing the PSAP-DIR service. It would not be appropriate for the ECO to simply stop PSAP-DIR once it has been implemented and is in operation. ECO and ECC will have a responsibility to settle the succession in order to protect their reputations. This could incur unforeseeable costs and efforts. There may also be a reputational risk for ECC and ECO if there was a major technical failure.

### Probability and impact

The probability of the occurrence of a political incident related to the PSAP-DIR is considered to be low and is only likely to arise in the case of isolated incidents.

Due to the voluntary nature of PSAP-DIR one could envisage that the participating PSAPs would admit a level of understanding if the ECO decided to discontinue the provision of the service. Therefore, the probability of the ECO and ECC suffering reputational damage due to terminating the provision of the PSAP-DIR service in the future is low to medium.

* Probability of the occurrence of a political incident related to the PSAP-DIR: Low
* Impact of the occurrence of a political incident related to the PSAP-DIR: Low/Medium

### Mitigating measures

It is difficult to devise mitigating measures for political risk given that it is something that could arise with an isolated incident and which is very much outside of the control of the concerned stakeholders. Each participating PSAP would need to consider the probability and impact of such a situation arising before deciding on whether or not to participate in PSAP-DIR.

The risk of reputational harm to either ECO or ECC can be mitigated by including provisions in the contract with the PSAPs to regulate the situation where ECO chooses to terminate the hosting of the directory. If the ECO decided to terminate PSAP-DIR it should provide due notice to all registered PSAPs thereby supporting them to make alternative arrangements for example, by transferring the responsibility for the hosting of the service back to EENA.

# IMPACT ASSESSMENT

This chapter considers the potential impact of an ECO-hosted directory on the involved stakeholders.

## Impact on CEPT/ECC administrations (national NRAs/Ministries)

The proposal for PSAP-DIR envisages that the service would be provided on a voluntary basis as it is not possible to mandate participation. Therefore there is no impact in terms of implementing an ECC deliverable at the national level. The impact on CEPT administrations would mainly be confined to discussions within the ECC and its subordinated groups.

There would also be a further ongoing impact in terms of the national administration's participation in a technical maintenance group. However, participation in this forum is envisaged as being voluntary.

In conclusion, the impact on CEPT/ECC is deemed to be low as the role of the administrations is mainly limited to the development of the policy framework as part of their ongoing participation in the ECC and its subordinated groups.

## Impact on the ECO

The impact on the ECO is higher than on other stakeholders as it will be involved in developing the policy framework as well as committing financial and human resources for the development and ongoing maintenance of PSAP-DIR. As the permanent office of the CEPT, the ECO has the competence and experience to carry out this function subject to approval by the ECC Plenary and the ECO Council.

The overall impact on the ECO is deemed to be medium.

There is however a need to consider the long term commitments for ECO.

## Impact on Participating PSAPs

The responses received to the WG NaN/PT ES questionnaire discussed in Chapter 2 demonstrate support for PSAP-DIR. The vast majority of respondents to Question 8 (28 responses) consider that PSAP-DIR would not have a negative impact on their day-to-day operations, while 31 respondents to Question 2 considered that PSAP-DIR would help them to carry out their work more effectively.

It is considered that PSAP-DIR would be provided free of charge but this is subject to budgetary approval by the ECO Council. Based on the responses to the questionnaire, the financial impact on PSAPs is deemed to be minimal and is limited to covering the cost of any training needs that arise from using PSAP-DIR as well as the cost of calling PSAPs in other countries. However, if it is decided that PSAP-DIR should be funded by its user community there will be financial implications.

The financial and human resource commitment for PSAP representatives willing to participate in a technical maintenance group would be higher but it should be noted that 19 PSAP organisations from 13 countries indicated their willingness to participate in drafting terms and conditions of access and use.

The overall impact on participating PSAPs is deemed to be low in terms of cost and resource commitment.

## Impact on PSAPs Not Participating

Up to now, 112 is just a harmonised short code which can be dialled to get help in local emergency situation. The mandatory provision of caller location underlines this local use case. It could be argued that the implementation of PSAP-DIR allows the use of 112 to be suitable also for transnational emergency requests. More and more EU citizens will become aware of the possibility to request emergency assistance in another country with 112 transnational emergency services. The number of 112 calls requesting transnational help will increase and this may affect also PSAPs not participating in PSAP-DIR, because EU citizens specifically when travelling will most probably not check beforehand if transnational emergency calls are supported in the country they are going to visit.

Another impact on the PSAPs not participating might be a pressure to participate given the added value that PSAP-DIR could provide.

The overall impact on PSAPs not participating is deemed to be low/medium.

## Impact on the provision of emergency services in Europe

As already outlined in section 9.4, Member States, specifically those not participating in PSAP-DIR, could consider that PSAP-DIR effectively introduces a new type of emergency calls, which is a "transnational" emergency call and that this could therefore be regarded as interfering in the organisation of emergency services. It is difficult to quantify the benefits of PSAP-DIR at this stage but the ultimate benefit of facilitating inter-PSAP communications is the provision of more effective services quickly. If the project does proceed, it will be necessary to gather statistics on the use of PSAP-DIR in the future to assess its effectiveness but even at this stage in the process it is possible to speculate that the impact on the provision of emergency services in Europe will be positive.

The overall positive impact on the provision of emergency services in Europe is likely to be high.

# Summary of Main Findings

* The questionnaire results have established that the majority of organisations and countries that responded are, in principle, supportive of the proposal for the ECO to assume responsibility for the operation of PSAP-DIR and indicated that they would be willing to participate in such a scheme.
* Responses were received from 32 organisations in 23 (at the time of asking, 15 of them already used the EENA directory) out of 48 CEPT countries to the first questionnaire[[8]](#footnote-9), hence terms such as ‘majority’ represent the majority of those that responded to the questionnaires, and may or may not reflect the views of the majority of CEPT members.
* Many respondents agreed that PSAP-DIR would offer advantages to PSAPs for a number of relevant use cases. Very few respondents believed that the operation of PSAP-DIR would interfere negatively with the operation of PSAPs.
* The level of interest and support from European PSAPs in an ECO-hosted PSAP-DIR justifies the need for preparing a Feasibility Study on this subject.
* Some respondents expressed concern that PSAP-DIR could interfere with existing and well-functioning bilateral agreements between countries. For the avoidance of doubt, the proposal set out in this Report would not seek to replace such existing processes. Rather, it is envisaged to be an additional resource available to PSAPs to take advantage of when necessary.
* Reflecting the views of respondents, it is proposed that responsibility to ensure that information in PSAP-DIR is accurate and up to date lies exclusively with a designated focal PSAP in each country. The specific requirements (regarding the security levels, the different levels of access privileges etc.) would need to be determined, after consultation with emergency services organisations, during the implementation stage.
* PSAP-DIR is proposed to be used by PSAPs to respond to a variety of use cases. There were significant diverging views regarding the case of third party services (TPS) eCall. Having carefully considered the responses, the ECC is of the view that TPS eCall is not an appropriate use case for PSAP-DIR to cater for and TPS eCall service providers will not be granted access to PSAP-DIR.
* The existence of PSAP-DIR should not allow operators providing services to multi-site corporate networks or nomadic VoIP services to avoid their current statutory obligations for the conveyance and routing of emergency calls to the correct PSAP.
* The number of contact numbers per country remains an open question. A single contact number that is able to route to fall-back PSAPs for resilience purposes could be achieved or a small number of contacts could be available. The specific approach would need to be agreed between the emergency services organisations if PSAP-DIR is implemented by the ECO.
* Practical and operational issues raised in response to the questionnaires such as how to deal with SIM-less, hoax and malicious calls are a matter for the involved PSAPs. Such matters are not anticipated to affect the viability PSAP-DIR. PSAP-DIR could contain additional information on whether SIM-less calls or emergency calls without Calling Line Identification (CLI) are allowed.
* A key issue raised was whether the PSAP-DIR should be mandated or voluntary for EU Member States. Four respondents from two countries (Spain (3) and Germany (1)) have called for a mandated approach and have indicated that they would not support a voluntary scheme. Others have either supported a voluntary approach or, if supporting a mandated approach, would still participate in a voluntary scheme. It should be noted that the proposal from CEPT/ECC is for a voluntary approach and it does not have any legal requirement for mandating any requirements on CEPT countries. Mandating any such solution for EU Member States is a matter for the EU.
* A transfer of responsibility for PSAP-DIR from EENA to the ECO would reset the participation to zero. In each case an agreement would have to be concluded between the concerned party and the ECO which would recognise the rights and responsibilities of both parties.
* The financial consequences for ECO are not covered in this report. The ECO Council is the appropriate entity to consider this and it is being addressed internally.
* It has not been settled whether hosting PSAP-DIR is a relevant activity for the ECC and hence is within the ECO's remit.
* The outcome of this Feasibility Study will be considered along with an internal assessment of the estimated costs of developing and maintaining PSAP-DIR. Subject to the decision from the ECC Plenary and the approval by the ECO Council, the ECO may develop and maintain PSAP-DIR.
1. EENA Letter





1. Results of Questionnaires

This Annex is contained in a separate accompanying document entitled – “ECC Report 264 – Annex 2”

1. The second questionnaire was only sent to the respondents of the first questionnaire. [↑](#footnote-ref-2)
2. Austria, Belgium, Bulgaria, Croatia, Czech Republic, Estonia, Finland, Hungary, Iceland, Ireland, Latvia, Lithuania, Luxembourg, Netherlands, Poland, Romania, Slovak Republic, Sweden and UK [↑](#footnote-ref-3)
3. At the time the questionnaire was published, there were PSAPs from 15 participating countries. Since then Austria, Luxembourg, Netherlands and Poland have joined. [↑](#footnote-ref-4)
4. Swedish PSAP and BAKOM also answered ‘yes’, but they had indicated ‘no preference’ to question 1. [↑](#footnote-ref-5)
5. http://www.eena.org/uploads/gallery/files/operations\_documents/3-5-4-1\_transnationalemergencycalls.pdf [↑](#footnote-ref-6)
6. [ECC Report 074](http://www.erodocdb.dk/doks/filedownload.aspx?fileid=3160&fileurl=http://www.erodocdb.dk/Docs/doc98/official/pdf/ECCREP074.PDF) - Access to emergency calls based on Voice over IP. [ECC Report 143](http://www.erodocdb.dk/doks/filedownload.aspx?fileid=3627&fileurl=http://www.erodocdb.dk/Docs/doc98/official/pdf/ECCREP143.PDF) - Practical improvements in handling 112 emergency calls: caller location information. [ECC Report 193](http://www.erodocdb.dk/doks/filedownload.aspx?fileid=3947&fileurl=http://www.erodocdb.dk/Docs/doc98/official/pdf/ECCREP193.PDF) - Emergency calls in VoIP environment: compilation of recent studies. [↑](#footnote-ref-7)
7. Convention for the Establishment of the European Communications Office (ECO) - <http://www.cept.org/files/1050/ECO/About%20ECO/ECO%20Convention/ECO%20Convention%20-%20English.pdf> [↑](#footnote-ref-8)
8. The second questionnaire was only sent to the respondents of the first questionnaire. [↑](#footnote-ref-9)