



ECC Report **264**

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

Approved 31 May 2017

0 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 questionnaire¹, 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.

¹ The second questionnaire was only sent to the respondents of the first questionnaire.

- 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.

TABLE OF CONTENTS

0	Executive summary	2
1	Introduction	7
2	Background	8
3	Expected Support from European Emergency Services Stakeholders	9
3.1	Responses from the first questionnaire	9
3.1.1	Levels of support for, and anticipated benefits of, PSAP-DIR	9
3.1.2	Operational and logistical implications of operating PSAP-DIR	10
3.1.3	The potential implications to the existing practices of PSAPs	12
3.1.4	General remarks and willingness to participate in drafting specifications	12
3.1.5	Summary of responses to the first questionnaire	12
3.2	Responses from the second questionnaire	12
3.2.1	Summary of responses to the second questionnaire	13
3.3	Summary and analysis of responses from both questionnaires	13
3.3.1	Areas of agreement or general consensus	13
3.3.2	Areas for which further analysis may be required	14
4	Current EENA Directory	15
4.1	History	15
4.2	Contents of the EENA Directory	15
4.3	Conditions to be fulfilled by Designated Focal PSAPs	16
4.4	Access to the Directory and Security	16
4.5	Responsibility and Liability	16
5	Remit of CEPT/ ECC in Emergency Services Communications	17
5.1	ECC Strategic Plan 2015-2020	17
5.2	WG NaN Terms of Reference	17
5.3	Role of the ECO	18
5.4	Arguments for and against PSAP-DIR	18
6	Technical and Administrative Considerations for PSAP-DIR	20
6.1	PSAP-DIR Participation	21
6.2	Fields/Columns in PSAP-DIR	21
6.2.1	Data Entry and Maintenance	22
6.2.2	Protocol for Use and Contingency Plans	22
6.2.3	Membership Management - Designated Focal PSAP Contact Points	23
6.2.4	Membership Management - PSAP operatives	23
7	Legal structure	24
7.1	Contractual basis	24
7.2	Elements in the contract	24
8	Risk assessment	26
8.1	Risk of legal actions against ECO For Alleged Failure To Fulfil Contractual Obligations	26
8.1.1	Description	26
8.1.2	Probability and impact	26
8.1.3	Mitigating measures	27
8.2	Physical Damage caused by Natural Events	27
8.2.1	Description of risk	27
8.2.2	Probability and impact	27

8.2.3	Mitigating measures.....	28
8.3	Unauthorised access to The online version of PSAP-DIR	28
8.3.1	Description of risk	28
8.3.2	Probability and impact.....	28
8.3.3	Mitigating measures.....	28
8.4	Technical failure.....	29
8.4.1	Description of risk	29
8.4.2	Probability and impact.....	29
8.4.3	Mitigating measures.....	29
8.5	Unauthorised Access to an Offline Version of PSAP-DIR.....	29
8.5.1	Description of risk	29
8.5.2	Probability and Impact	29
8.5.3	Mitigating measures.....	30
8.6	Political and reputational risk - National Level and ECO.....	30
8.6.1	Description	30
8.6.2	Probability and impact.....	30
8.6.3	Mitigating measures.....	30
9	IMPACT ASSESSMENT	32
9.1	Impact on CEPT/ECC administrations (national NRAs/Ministries).....	32
9.2	Impact on the ECO	32
9.3	Impact on Participating PSAPs.....	32
9.4	Impact on PSAPs Not Participating	32
9.5	Impact on the provision of emergency services in Europe	33
10	Summary of Main Findings	34
	ANNEX 1: EENA Letter	36
	ANNEX 2: Results of Questionnaires	38

1 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 countries².

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.

² Austria, Belgium, Bulgaria, Croatia, Czech Republic, Estonia, Finland, Hungary, Iceland, Ireland, Latvia, Lithuania, Luxembourg, Netherlands, Poland, Romania, Slovak Republic, Sweden and UK

2 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.

3 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.

3.1 RESPONSES FROM THE FIRST QUESTIONNAIRE

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

3.1.1 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 15³ 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.

³ At the time the questionnaire was published, there were PSAPs from 15 participating countries. Since then Austria, Luxembourg, Netherlands and Poland have joined.

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 indicated 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.

3.1.2 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.

3.1.3 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.

3.1.4 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.

3.1.5 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.

3.2 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.

3.2.1 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 countries⁴.
- 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).

3.3 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.

3.3.1 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

⁴ Swedish PSAP and BAKOM also answered 'yes', but they had indicated 'no preference' to question 1.

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.

3.3.2 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.

4 CURRENT EENA DIRECTORY

4.1 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 document⁵ 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.

4.2 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.

⁵ http://www.eena.org/uploads/gallery/files/operations_documents/3-5-4-1_transnationalemergencycalls.pdf

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

Country	Emergency Service Name	Type of PSAP (Fire; Emergency Medical Services; Police)	Region	City	Geographical area covered	Geographical areas covered by other services that you can pass emergency calls to	24 hour emergency contact number (to be called from a foreign country)	Spoken languages	Website
Belgium	CS 100-112 Bruxelles, HC 100-112 Brussel,	Fire & rescue Medical	Brussels capital + Brabant Wallon	Brussels	Brussels city and a part of the province (Brabant Wallon)	All Belgium	+32.....	French Dutch English	
Bulgaria	National 112 Emergency System	all	Entire country	Entire country	National scale	all Bulgaria	+359.....	English	http://www.mes.government.bg
Denmark	National 112 Emergency System	all	Entire country	Entire country	National scale	all Denmark	+45.....	English German (+ 50%)	
Estonia	Häirekeskus (Emergency Response Center)	Fire & rescue Medical (possibility to pass the emergency call on the police)			National scale	all Estonia	+372....	Estonian English Russian	www.rescue.ee

4.3 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."

4.4 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.

4.5 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."

5 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](#)) and for Air-Ground-Air (AGA) ([ECC Decision \(06\)05](#)) 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](#) on establishing criteria for the accuracy and reliability of the caller location information in support of emergency services and [ECC Report 255](#) 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 communications⁶.

As far back as 1972, the CEPT also published [CEPT Recommendation T/ SF1](#) 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.

5.1 ECC STRATEGIC PLAN 2015-2020

The [ECC Strategic Plan for the period 2015-2020](#) 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"*.

5.2 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*

⁶ [ECC Report 074](#) - Access to emergency calls based on Voice over IP. [ECC Report 143](#) - Practical improvements in handling 112 emergency calls: caller location information. [ECC Report 193](#) - Emergency calls in VoIP environment: compilation of recent studies.

aspects of emergency services communications and cooperate with European emergency services stakeholders on regulatory matters where appropriate".

5.3 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](#), [SEAMCAT](#) and the [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.

5.4 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.

6 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.

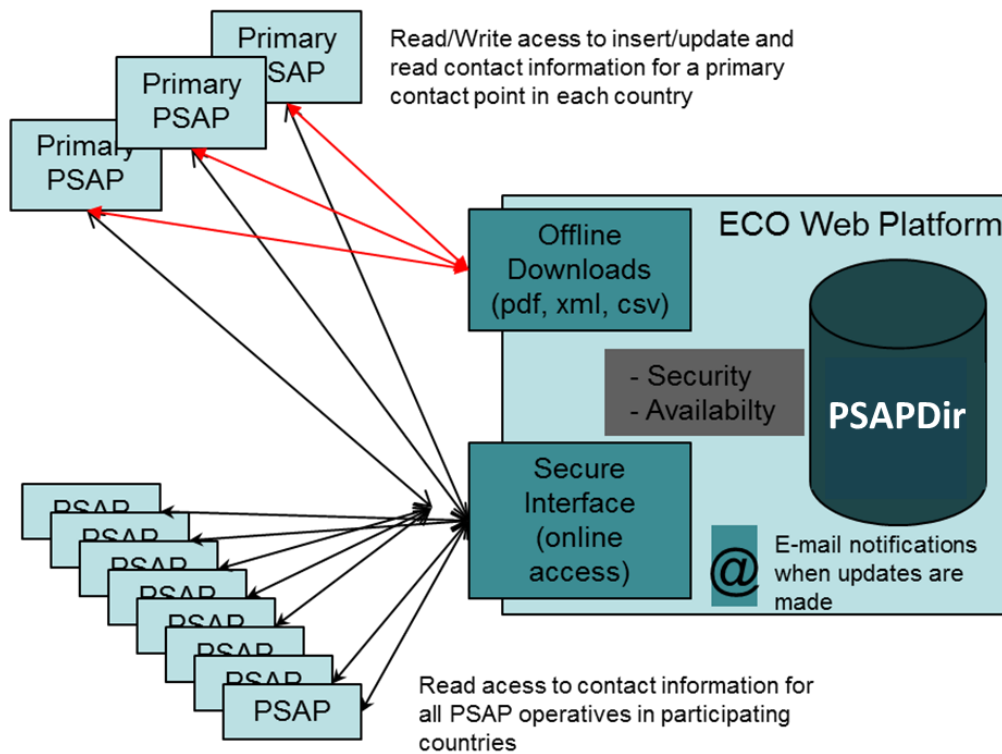


Figure 1: Proposed Structure of PSAP-DIR

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.

6.1 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.

6.2 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.

6.2.1 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"

6.2.2 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.

6.2.3 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.

6.2.4 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.

7 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.

7.1 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.

7.2 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)

8 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.

8.1 RISK OF LEGAL ACTIONS AGAINST ECO FOR ALLEGED FAILURE TO FULFIL CONTRACTUAL OBLIGATIONS

8.1.1 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.

8.1.2 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 submit 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**

8.1.3 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 B⁷. 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.

8.2 PHYSICAL DAMAGE CAUSED BY NATURAL EVENTS

8.2.1 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.

8.2.2 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**

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>

8.2.3 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.

8.3 UNAUTHORISED ACCESS TO THE ONLINE VERSION OF PSAP-DIR

8.3.1 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.

8.3.2 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**

8.3.3 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.

8.4 TECHNICAL FAILURE

8.4.1 Description of risk

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

8.4.2 Probability and impact

The ECO's raison d'être 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**

8.4.3 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.

8.5 UNAUTHORISED ACCESS TO AN OFFLINE VERSION OF PSAP-DIR

8.5.1 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.

8.5.2 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**

8.5.3 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.

8.6 POLITICAL AND REPUTATIONAL RISK - NATIONAL LEVEL AND ECO

8.6.1 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.

8.6.2 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**

8.6.3 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.

9 IMPACT ASSESSMENT

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

9.1 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.

9.2 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.

9.3 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.

9.4 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**.

9.5 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**.

10 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 questionnaire⁸, 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.

⁸ The second questionnaire was only sent to the respondents of the first questionnaire.

- 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.

ANNEX 1: EENA LETTER



**Mr. Johannes Vallesverd,
Chairman, CEPT/ECC Working
Group Numbering and Networks.
Mr. Florin Dragomir, Chairman
CEPT/ECC/WG NaN Project Team
Emergency Services.
c/o The European Communications
Office
Nyropsgade 37, 4
1602 København V
Denmark**

Brussels, 10 April 2015

Re: Database of European PSAP E.164 numbers

Dear Sirs

I refer to the previous correspondence regarding the establishment of a secure database of E.164 numbers of all the European Public Safety Answering Points (PSAPs) to support transnational emergency calls.

During normal PSAP operations situations arise when a citizen in country A needs to alert the emergency services in country B in order to seek assistance for a family member/colleague who lives in country B. If the citizen dials 112 (or whatever national emergency number pertains) his/her emergency call will be handled by the emergency services in his/her own country (country A). The emergency services in country A are unable to reach the emergency services in country B because they do not know the "connect to" number (a standard E.164 telephone number) in country B¹.

In response to this gap and at the explicit request of the emergency services in Europe, EENA established a database in 2011 and currently has 15 countries (Belgium, Bulgaria, Croatia, Czech Republic, Estonia, Finland, Hungary, Iceland, Ireland, Latvia, Lithuania, Romania, Slovak Republic, Sweden, UK) involved in the initiative. Despite some countries such as Austria pledging support for the concept, they are unable to participate because EENA, as the database host, is a non-governmental organisation and these countries would prefer that the database is hosted by an appropriate public European body with relevant expertise and experience to provide the service. In doing so they readily recognise the benefits to the emergency services and the citizens which is that the emergency services can now refer emergency calls between Member States and increase the effectiveness of the response they can offer to citizens who are in distress, even if the caller is in another country. Until now, EENA has successfully managed this database but the time has come to place it on a more formal footing.

To that end EENA has identified CEPT/ECC as an appropriate European body that could host the database and it would kindly request CEPT/ECC to consider the possibility of doing so. In EENA's view CEPT/ECC, and especially WG NaN and its Project Teams, has the requisite expertise to develop a formal and sustainable framework for the database. To support this, EENA would provide CEPT/ECC with the information and support necessary to affect the takeover and act as conduit for any communication or user requirements that may be needed with the PSAPs. EENA is available at all times to help with any further requests.

¹ See http://www.eena.org/uploads/gallery/files/operations_documents/3-5-4-1_transnationalemergencycalls.pdf



We remain at your disposal for any further queries.

Yours sincerely,

Gary Machado
Executive Director

Tony O'Brien
Deputy Executive Director

ANNEX 2: RESULTS OF QUESTIONNAIRES

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



ECC Report 264 – Annex 2

Summary of Responses to Two Questionnaires on an
ECO-hosted directory of E.164 numbers to facilitate
contact between PSAPs in different European countries

Questionnaires prepared by ECC/WG NaN/
Project Team Emergency Services (PT ES)

Approved 31 May 2017

TABLE OF CONTENTS

1. Introduction	3
2. Results of the First Questionnaire	4
2.1 Introduction	4
2.2 Potential use cases.....	4
2.3 Evidence of support from Public Safety Answering Points (PSAPs).....	6
2.4 Responding Organisations	7
2.5 Question 1.....	8
2.6 Question 2.....	10
2.7 Question 3.....	13
2.8 Question 4.....	15
2.9 Question 5.....	19
2.10 Question 6.....	21
2.11 Question 7.....	32
2.12 Question 8.....	38
2.13 Question 9.....	40
2.14 Question 10.....	40
2.15 Question 11.....	42
2.16 Question 12.....	44
3. Results of the Second Questionnaire.....	47
3.1 Introduction	47
3.2 Responding Organisations	47
3.3 Question 1.....	48
3.4 Question 2.....	49

1. INTRODUCTION

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 Annex.

- The first questionnaire was distributed on 24 June 2015 for response by 14 August 2015. 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. The second questionnaire was distributed on 9 March 2016 for response by 1 April 2016. 24 responses were received from administrations or emergency services organisations in 19 CEPT countries.

2. RESULTS OF THE FIRST QUESTIONNAIRE

2.1 INTRODUCTION

The European Emergency Number Association (EENA) currently hosts a database containing E.164 telephone numbers to allow Public Safety Answering Points (PSAPs) in different European countries to communicate with each other. The database was established in 2011 and PSAPs can share their phone numbers on a voluntary basis. EENA has published a document ([Transnational Emergency Calls](#)) which describes the processes and procedures on how the database is used.

EENA approached the Electronic Communications Committee (ECC) Working Group Numbering and Networks (WG NaN) and its Project Team Emergency Services (PT ES) requesting the ECC to consider the possibility of hosting this database. The EENA request states that *“until now, EENA has successfully managed this database but the time has come to place it on a more formal footing”*. The written EENA request is contained in Annex 1.

According to EENA *“PSAPs from 15 countries (Belgium, Bulgaria, Croatia, Czech Republic, Estonia, Finland, Hungary, Iceland, Ireland, Latvia, Lithuania, Romania, Slovak Republic, Sweden and UK) are currently involved in the initiative”*. EENA states in its letter that *“despite some countries such as Austria pledging support for the concept, they are unable to participate because EENA, as the database host, is a non-governmental organisation and these countries would prefer that the database is hosted by an appropriate public European body with relevant expertise and experience to provide the service”*. The EENA letter goes on to state that it has *“identified CEPT/ECC as an appropriate European body that could host the database and it would kindly request CEPT/ECC to consider the possibility of doing so”*.

The EENA letter describes how the database could be used to support transnational emergency calls. PT ES identifies other possible use cases where inadvertent roaming occurs or where calls originated on VoIP networks, or private corporate networks, are wrongly routed or TPS eCall. Having access to such a database would allow the PSAP receiving the call to seek assistance from a PSAP in another country if required.

WG NaN/PT ES would like to stress that:

- The organisation of emergency services is of the exclusive national competence of each CEPT Member State and the CEPT permanent office, the European Communications Office (ECO) and WG NaN/PT ES has no intention to interfere with it;
- The ECO, CEPT/ECC would not accept any responsibility or liability for the correctness of the information in the database, loss of confidentiality or any damage or loss caused by its use, or by any downtime that may happen on the access to the database;
- This questionnaire does not commit ECO, CEPT/ECC to go ahead with such a database;
- ECO, CEPT/ECC feels free to define terms and conditions, should the database project go ahead;
- This questionnaire is addressed to the national entities responsible for handling 112 emergency calls.

2.2 POTENTIAL USE CASES

This section describes possible call scenarios where the database could be used. The example cases presented here are not exhaustive. The database could also be relevant to other emergency call cases.

1) Emergency calls with transnational element

This is the use case described in the EENA letter and is illustrated in Figure 1 below:

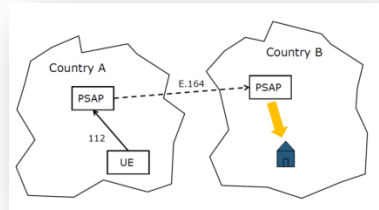


Figure 1

A caller in Country A makes a call to the emergency services in Country A requesting emergency assistance in Country B. The PSAP operator consults the database for the telephone number of the PSAP in Country B. The PSAP operator then places a call to the PSAP in Country B and requests emergency assistance on behalf of the caller. It has to be considered that there is no legal requirement or prohibition for this type of 112 emergency call in the European framework.

2) Emergency calls where network issues are experienced (inadvertent roaming)

This use case is illustrated in Figure 2 below:

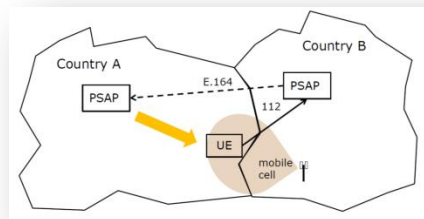


Figure 2

A caller in Country A intends to make a call to 112 in Country A, but is inadvertently roaming on a network in neighbouring Country B. This can happen in border areas, and the call is received by the PSAP in Country B. The PSAP operator in Country B consults the database for the telephone number of the PSAP in Country A. The PSAP operator then places a call to the PSAP in Country A and requests emergency assistance on behalf of the caller.

3) Wrongly routed emergency calls from nomadic VoIP services

In this case, a caller is travelling in a foreign country (Country B) and places a call to emergency services from a VoIP application. The call might be routed to the emergency services in the caller's home country (Country A), but the emergency assistance is required in Country B. The PSAP operator in Country A consults the database for the telephone number of the PSAP in Country B. The PSAP operator then places a call to the PSAP in Country B and requests emergency assistance on behalf of the caller. It has to be considered that the database of E.164 numbers for PSAP once established and officially maintained might be interpreted by VoIP service provider as an existing work-around to solve the routing problem for

emergency calls in nomadic use. Regulators, however, could argue that the database does not substitute national obligations for service providers.

4) Wrongly routed emergency calls originating on corporate networks

A corporate network may extend across the borders of two or more countries. If a call to emergency services is made from within the corporate network in one country (Country A), but call breaks out on to the public network in another country (Country B) it will terminate at the wrong PSAP. The PSAP operator in Country B consults the database for the telephone number of the PSAP in Country A. The PSAP operator then places a call to the PSAP in Country A and requests emergency assistance on behalf of the caller. It has to be considered that the database of E.164 numbers for PSAP once established and officially maintained might be interpreted as an existing work-around to solve the routing problem for emergency calls from corporate networks. Regulators, however, could argue that the database does not substitute national obligations for service providers.

5) TPS eCall

eCall will become mandatory in all cars in the EU from 2018. According to the legislation the service may be provided using pan-European eCall, where a 112 call is sent directly to the PSAP, or using TPS eCall, where an the call is conveyed to the PSAP through a Third Party Service call centre. TPS eCalls is a matter that still requires regulatory clarification.

The TPS call centre may serve multiple countries, and it is therefore possible that it will receive eCalls which require assistance in a different country than where the TPS call centre is located. The TPS call centre (or the PSAP cooperating with the TPS call centre) would need to be able to place calls to PSAPs in other countries where emergency assistance may be required.

NOTE: The purpose of the proposed database is to facilitate inter-PSAP communications. TPS call centres are not by definition PSAPs and any extension of the proposed database to TPS call centres would be a matter for European PSAPs to decide.

2.3 EVIDENCE OF SUPPORT FROM PUBLIC SAFETY ANSWERING POINTS (PSAPS)

PT ES recognises that the organisation of emergency services is of the exclusive national competence of each CEPT Member State and it has no intention to interfere with PSAP operations in any way.

PT ES examines the relevant issues associated with potentially taking over the database project from EENA. The information received in response to this questionnaire will inform a Feasibility Study. After gathering relevant information from PSAPs, the ECC will decide on whether or not to proceed.

The first step in developing a Feasibility Study is to ask whether there is support from European PSAPs for the initiative and to determine if the European PSAPs would provide and maintain an entry of their contact details in the database and use it.

If the ECC decides to proceed, PT ES envisages that:

- The database would be hosted by the European Communications Office (ECO) under the framework of an ECC Decision to provide the service.
- The use of the database by PSAPs would be on a voluntary basis.
- Each PSAP would be responsible for the provision and maintenance of the information contained in the database.

Your response to the following questions is kindly requested by Friday, 14 August 2015. Please send your response to Ms Susanne Have (Susanne.have@eco.cept.org) at the European Communications Office.

2.4 RESPONDING ORGANISATIONS

Organisation	Country
Ministry of the Interior	Austria
Federal Public Service Interiors – Direction 112	Belgium
Mol, Directorate National 112 System	Bulgaria
National Protection and Rescue Directorate	Croatia
General Directorate of Fire and Rescue Service	Czech Republic
Danish National police, Center for emergency communication Copenhagen Fire Brigade	Denmark
Estonian Emergency Response Centre	Estonia
Emergency Response Centre Administration	Finland
Experts group on emergency calls (Expertengruppe Notruf, EGN) *	Germany
General Secretariat for Civil Protection (GSCP)	Greece
Neyðarlínan ohf. 112	Iceland
ECAS	Ireland
State Fire and Rescue Service	Latvia
Emergency Response Centre (Bendrasis pagalbos centras)	Lithuania
National Rescue Agency (Administration des Services de Secours – ASS)	Luxembourg
Ministry for Home Affairs and National Security	Malta
National Police	The Netherlands
Police Shared Services (PSS) (The reply is not formally treated and approved by the national Police Directorate, only responded by Police Shared Services as product responsible for 112 solution, based on a technical evaluation)	Norway
Special Telecommunications Service	Romania
Ministry of Interior	Slovak Republic
Administration of the Republic of Slovenia for Civil Protection and Disaster Relief	Slovenia
Axencia Galega de Emerxencias	Spain
SEIB112 - Balearic Islands	Spain
112 Comunitat Valenciana (Valencian Region)	Spain
Spain - Centro Atención Urgencias y Emergencias 112 Extremadura	Spain
Junta de Castilla y León	Spain
112 Ceuta-Amgevesa - Consejeris Presidencia, Gobernación y Empleo – Ciudad Autónoma de Ceuta	Spain
Dirección de Atención de Emergencias y Meteorología	Spain
Ciudad Autónoma de Melilla	Spain
CECOP SOS Rioja	Spain
P. Asturias - 112 ASTURIAS	Spain
SOS Alarm Sverige AB	Sweden

*Reply from Germany (reply in German translated to English):

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.

2.5 QUESTION 1

Question 1 is addressed only to those organisations currently participating in the EENA database.

Does the EENA database help in your work? Please provide details in the “Remarks” field below.		
Country	Yes	No
Austria - Ministry of the Interior	N/A	
Belgium - Federal Public Service Interiors–Direction 112	Yes	
Bulgaria - Mol, Directorate National 112 System	Yes. Case 2.1- TIR drivers located abroad call 112 Bulgaria and asked help in country where TRUCK is located case 2.2 incidents on Bulgarian – Rumanian and Bulgarian- Greek borders	
Croatia - National Protection and Rescue Directorate		No. National protection and rescue directorate (NPRD) didn't receive any international emergency call so the EENA PSAPs Database wasn't used. On 27th July 2013. NPRD organised communication exercise in order to check procedures in case of Transnational Emergency Calls.
Czech Republic - General Directorate of Fire and Rescue Service	Yes	
Denmark - Danish National police, Center for emergency communication Copenhagen Fire Brigade	Yes partly We have already a database with relevant long numbers for Germany and Sweden	
Estonia - Estonian Emergency Response Centre	Yes. It is very useful in case of emergency calls with transnational element.	

Finland - Emergency Response Centre Administration	Yes. We have constant cooperation with Estonian and Swedish PSAPs	
Greece - General Secretariat for Civil Protection (GSCP)	Yes	
Iceland - Neyðarlínan ohf. 112	Yes. Once as far as I know Remark: We have been able to send response to a suicide of an Icelander abroad	
Ireland - ECAS	Yes. It is considered useful to have such international contact information available however the need for such information has not arisen to date (1 known case in last 5 years handled by Ambulance service)	
Latvia - State Fire and Rescue Service	Yes. The EENA database was used more than once to communicate with several countries PSAPs.	
Lithuania - Emergency Response Centre	Yes. Each year Emergency Response Centre (ERC) receives some 20-30 emergency calls about the need of urgent assistance in other country. In most of cases emergency calls come when Lithuanian person is in danger outside Lithuania and can't communicate with 112 PSAP of a country of his/her presence due to lingual reasons. Therefore he/she calls someone him/her knows in a home country and explains his/her problems. Then the person that received a call in Lithuania calls 112 and is put through to ERC. ERC then hears the problem and tries to contact appropriate PSAP in the country of emergency. To this end ERC call taker addresses PSAP database maintained by EENA. Some calls are also received from 112 PSAPs of other countries trying to respond to the emergency in Lithuania.	
Luxembourg – National Rescue Agency	Yes. Translation in case of need.	
Malta - Ministry for Home Affairs and National Security	N/A	
Romania - Special Telecommunications Service	Yes. Since the EENA database establishment until now, the Romanian PSAPs have been initiating/receiving calls to/from other European PSAPs for various emergencies, which helped improve the intervention process.	
Slovak Republic - Ministry of Interior	Yes. We are often contacted by foreign PSAPs with calls concerning incidents in our territory	
Slovenia - Administration of the Republic of Slovenia for Civil	Yes	

Protection and Disaster		
Spain - Axencia Galega de Emerxencias	Yes	
Spain - Junta de Castilla y León	N/A	
Spain - SEIB112 - Balearic Islands	Yes, not using it right now	
Spain - 112 Comunitat Valenciana (Valencian Region)		We currently do not use the database. We're a regional PSAP and do not share borders with other Member States. Our use case is with neighbor regions (Catalunya, Aragón, Murcia, Castilla La Mancha) and all of us have the mutual contact list, including also not-neighbor regions of Spain.
Spain - Centro Atención Urgencias y Emergencias 112 Extremadura	Do not have the database, we cannot comment	
Spain - Dirección de Atención de Emergencias y Meteorología		No
Spain - Ciudad Autónoma de Melilla	Yes. From our location and taking into account that most of the citizens travel from central European countries for holidays to their home countries, we think it should be a good tool to help us in order to improve our service	
Spain - CECOP SOS Rioja		No
Spain–P.Asturias - 112 Asturias	Ok. But surrounding countries are not necessarily, EU, with 112 operating centers.	
Sweden - SOS Alarm Sverige AB	Yes. SOS Alarm connected the caller on the emergency number 112 with a PSAP in another country in 457 cases during 2014, according to statistics. The number would almost certainly have been higher if numbers were accessible to more/all European countries.	

2.6 QUESTION 2

Are you, in principle, supportive of the idea of the ECC assuming administration of the database from EENA, maintained by the ECO, under a framework set by ECC for use by European PSAPs on a voluntary basis?.		
Country	Yes	No
Austria - Ministry of the Interior	Yes	
Belgium - Federal Public Service Interiors–Direction 112	Yes	
Bulgaria - Mol, Directorate National 112 System	Yes	
Croatia - National Protection and Rescue Directorate	Yes. In 2012, NPRD support EENA PSAPs Database project and NPRD also support the idea of the ECC	

	assuming administration of the database from EENA.	
Czech Republic - General Directorate of Fire and Rescue Service	Yes	
Denmark - Danish National police, Center for emergency communication Copenhagen Fire Brigade		No. General we cannot support that organizations like the ECO maintain these types of information about our PSAP.
Estonia - Estonian Emergency Response Centre	Yes. It might extend the range of PSAPs providing their contact numbers, which is necessary to provide better 112 service to citizens.	
Finland - Emergency Response Centre Administration	Yes	
Greece - General Secretariat for Civil Protection (GSCP)	Yes	
Iceland - Neyðarlínan ohf. 112	Yes	
Ireland - ECAS	Yes	
Latvia - State Fire and Rescue Service	Yes	
Lithuania - Emergency Response Centre	Yes. We are satisfied by work done by EENA. However, if a transfer of a PSAP database maintenance to ECC would enlarge number of countries participating in the database, we would be more than happy as this will increase the potential of saving even more lives. Therefore, the answer is a firm YES.	
Luxembourg – National Rescue Agency	Yes	
Malta - Ministry for Home Affairs and National Security	Yes N/A	
The Netherlands - National Police	Yes. Improvement of services in a fast growing complex technological infrastructure.	
Norway - Police Shared Services (PSS)	Yes. Need to cover geographical routing to correct PSAP in receiving country based on zip-code/a-number information. We would also prefer that the database lookup to "country B"s PSAP is done automatically from Norway's National Reference Database (NRDB) as part of the 112 call setup and then provided as a new field in the communication string from NRDB to Central integration point for police together with the other Indication of Origin information. We don't want to manually having to lookup in a database (which we probably haven't started before the actual need is there. 112 calls from a foreign number is not happening every hour..) typing in the proper A-number (10-16 digits...).	
Romania - Special	Yes. We are supportive of the idea	

Telecommunications Service	that the database should be administered by a European public body.	
Slovak Republic - Ministry of Interior	Yes. The database should be handled by European body. It might also encourage more states to join the database.	
Slovenia - Administration of the Republic of Slovenia for Civil Protection and Disaster	Yes	
Spain - Axencia Galega de Emerxencias	Yes	
Spain - SEIB112 - Balearic Islands	Yes	
Spain - 112 Comunitat Valenciana (Valencian Region)	Yes	
Spain - Centro Atención Urgencias y Emergencias 112 Extremadura	Yes	
Spain - Junta de Castilla y León	Yes	
Spain - 112 Ceuta-Amgeveciesa-Consejeris Presidencia, Gobernación y Empleo–Ciudad Autónoma de Ceuta		No
Spain - Dirección de Atención de Emergencias y Meteorología	Yes	
Spain - Ciudad Autónoma de Melilla	We don't have enough information about it. Otherwise we think the right option must allow the best administration of the database. So, we can get the best service from that.	
Spain - CECOP SOS Rioja	Yes	
Spain–P.Asturias - 112 Asturias	Yes	
Sweden - SOS Alarm Sverige AB (PTS Remark to this question)	<p>Yes. It becomes more and more important in our global world where people are travelling between countries more frequent than ever, that it is possible to handle calls where the actual help is needed. It is therefore important that someone has the responsibility for maintaining a database and it is appropriate that this is done by a official entity since this obviously is essential for the participation of many countries. What we can see, ECC would be a suitable host for the database.</p> <p>Added reply from: PTS will wait for the results of the analysis described below before taking position for yes or no to this question.</p> <p>On the last meeting in ECC it was decided to start an analysis on whether the database would fall within the responsibility of ECC/WG NaN/PT ES according to their terms of reference. The legal issues associated with the transfer of the database, including its terms,</p>	

	<p>conditions and costs, as well as the need to understand the level of support (including from the European Commission) for this initiative were also raised. The legal issues will be addressed in the "Feasibility Study" carried out by WG NaN. ECC also tasked WG NaN to examine whether the hosting of such a database would fall within its terms of reference as part of its analysis.</p>	
--	--	--

2.7 QUESTION 3

If yes to Question 2 and considering the additional costs for your PSAPs, would you consider participating in the database project, which means getting access to the database and sharing your contact details with other PSAPs?		
Country	Yes	No
Austria - Ministry of the Interior	Yes	
Belgium - Federal Public Service Interiors–Direction 112	Yes. Assuming the additional costs stay within reasonable limits.	
Bulgaria - Mol, Directorate National 112 System	Yes	
Croatia - National Protection and Rescue Directorate	Yes. NPRD is interesting in participating in this database project.	
Czech Republic - General Directorate of Fire and Rescue Service	Yes	
Estonia - Estonian Emergency Response Centre	Yes	
Finland - Emergency Response Centre Administration	Yes. We would be ready to cover our own costs that arise from using the database.	
Greece - General Secretariat for Civil Protection (GSCP)	Yes. In principle, we agree with participating in the database project, although this might entail some costs for the PSAPs, as we believe that the database project will facilitate transnational cooperation in handling emergency calls.	
Iceland - Neyðarlínan ohf. 112	Yes. The charges for occasional forwarding to a foreign number will not offset our operation.	
Ireland - ECAS	Yes	
Latvia - State Fire and Rescue Service	Yes	
Lithuania - Emergency Response Centre	Yes. Our costs of our present participation in PSAP database maintained by EENA are very insignificant and our personnel are already trained to handle transnational cases. Therefore the answer is a firm YES.	
Luxembourg – National Rescue Agency	Yes	
Malta - Ministry for Home Affairs and National Security	Yes. In principle we agree, but this is subject to ongoing discussion	

	between the different stakeholders.	
The Netherlands - National Police	Yes	
Norway - Police Shared Services (PSS)	Yes but potential additional costs need to be estimated and Police Shared Services (PSS) need to get this project approved (and registered) by (from) our Police Directorate. The participation in this project would be co-ordinated by PSS, but it would technically also be handled by our integration team towards our national NRDB provider (department in Police ICT services).	
Romania - Special Telecommunications Service	Yes. As the takeover by ECO of the database administration does not change its current use by the PSAPs, we are bearing the costs incurred from using the international call numbers.	
Slovak Republic - Ministry of Interior	Yes. We consider our participation as natural enhancement European emergency number services.	
Slovenia - Administration of the Republic of Slovenia for Civil Protection and Disaster	Yes	
Spain - Axencia Galega de Emerxencias	Yes. Nowadays, CAE112 Galicia collaborates with Portugal (ARIEM project) managing together cross-border emergencies. So the idea of a common European database seems perfect. CAE112 Galicia will be happy to collaborate in it.	
Spain - SEIB112 - Balearic Islands	Yes	
Spain - 112 Comunitat Valenciana (Valencian Region)	Yes	
Spain - Centro Atención Urgencias y Emergencias 112 Extremadura	Yes	
Spain - Junta de Castilla y León	Yes	
Spain - 112 Ceuta-Amgeveciesa - Consejeris Presidencia, Gobernación y Empleo–Ciudad Autónoma de Ceuta		No
Spain - Dirección de Atención de Emergencias y Meteorología	Yes It depends on the costs.	
Spain - Ciudad Autónoma de Melilla	We must know the main costs before having an answer	
Spain - CECOP SOS Rioja		No. I haven't expected such expenses.
Spain–P.Asturias - 112 Asturias	Ok but it is not a problem to participate and provide data, in the event of additional costs should be assessed for approval.	
Sweden - SOS Alarm Sverige AB	Yes. Sweden is already part of the EENA database and would certainly continue to participate.	

NOTE TO QUESTION 3: The cost of developing and maintaining the database would be incurred by the ECO. Access to the database would be provided to European PSAPs free of charge. However, other costs may arise from using the database (cost of long distance calls to other countries, training of PSAP operators etc.)

2.8 QUESTION 4

Could such a database help to carry out the duties of PSAPs more effectively? If yes, what use cases do you envisage? Please provide further information in the "Remarks" field below.		
Country	Yes	No
Austria - Ministry of the Interior	Yes. Cases where relatives of affected persons that are in different countries than the affected one, have information and make an emergency call in "their" country, where that PSAP has to call the responsible PSAP in another country, where the affected person resides. Note: Cases of "Roaming in the wrong network in border areas" are solved with bilateral agreements between Austria and its neighboring countries.	
Belgium - Federal Public Service Interiors–Direction 112	Yes	
Bulgaria - Mol, Directorate National 112 System	Yes	
Croatia - National Protection and Rescue Directorate	Yes. Such database could provide effective information management between PSAPs on international level.	
Czech Republic - General Directorate of Fire and Rescue Service	Yes All use cases provided above	
Denmark - Danish National police, Center for emergency communication Copenhagen Fire Brigade	Yes. We already use similar information in our cooperation with German and Swedish PSAPs. In the majority of cases due to the routing in the mobile network (figure 2.). Few cases because the caller needs to get in contact with foreign authorities.	
Estonia - Estonian Emergency Response Centre	Yes. It helps to help people on best possible way, e.g. emergency calls with transnational elements.	
Finland - Emergency Response Centre Administration	Yes. Emergency calls with transnational (Sweden, Estonia) element like illustrated in Figure 1	
Greece - General Secretariat for Civil Protection (GSCP)	Yes. The use of the database would facilitate effective handling of emergency calls in the categories mentioned above (e.g. inadvertent roaming, calls with a transnational element etc.).	

Iceland - Neyðarlínan ohf. 112	Yes, if effectiveness is a measure of service. Better service to the distressed caller is the aim of the business, although the emergency may be located elsewhere.	
Ireland - ECAS	Yes. We consider that the database could be effectively used to deal with incorrectly routed emergency calls resulting from Nomadic VoIP operation as well as incorrectly configured corporate networks. In addition we consider that this information would be useful in dealing with calls made in country on behalf of someone in another country where the communication between the caller and person in need of assistance was by other means (e.g. internet based direct messaging).	
Latvia - State Fire and Rescue Service	Yes. Any cases when people who is in other country right now, need to contact with PSAPs in their country of residence (health problems to relatives, other emergency situations, cases when it is impossible to find most spoken languages of communication with the caller to use the national PSAP as the translator.).	
Lithuania - Emergency Response Centre	Yes. There might be cases described in section 2 of this questionnaire when direct contact with foreign PSAPs would help to quicken the response. Another potential case is that PSAPs may use database to contact each other for a translation service, e.g. when person in Lithuania calls 112, but him/her can't speak Lithuanian, Russian, Polish, or English (languages ERC can handle). In this case Lithuanian ERC can call callers home country PSAP and ask for help to translate the problem the person faced.	
Luxembourg – National Rescue Agency	Yes	
Malta - Ministry for Home Affairs and National Security	Yes. Considering that Malta is an island state, this might be very useful in scenarios related to accidents at sea.	
The Netherlands - National Police	Yes. The database provides an operational network instead of the used more administrative network of the Department of Foreign Affairs of the Member States.	
Norway - Police Shared Services (PSS)	Yes. Don't think the database to access correct PSAP is the only important task here. Indication of Origin information of the caller (A-number) is equally important to retrieve (and forward somehow when calling	

	Country B PSAP, typically as a CLIP/COLP input or as part of data transfer from National database for Emergency calls). Use case is to achieve necessary information about the caller from the Country that holds this information, and to provide good service to the caller who needs assistance.	
Romania - Special Telecommunications Service	Yes. The use cases we envisage are: <ul style="list-style-type: none"> - Calling a European PSAP to announce from Romania the occurrence of an emergency on the territory of the respective state - Receiving international calls from European PSAPs which report emergencies occurred on the Romanian territory - Receiving/Transmitting calls originating from the border area between two states, calls which are taken by the mobile networks within the neighboring state (inadvertent roaming). 	
Slovak Republic - Ministry of Interior	Yes. Cases when caller is requesting assistance for relatives in another country or wrongly routed mobile calls are frequent. The database would allow handling these calls with greater efficiency.	
Slovenia - Administration of the Republic of Slovenia for Civil Protection and Disaster	Yes Examples from Chapter 2, 2.3 and 2.4.	
Spain - Axencia Galega de Emerxencias	Yes. A common European database would help CAE112 Galicia in those emergencies where a person in Galicia asks for help not for him/her but for another person who, in that particular moment, is in other European country having an emergency.	
Spain - SEIB112 - Balearic Islands	Yes, regarding the touristic.	
Spain - 112 Comunitat Valenciana (Valencian Region)	Yes Cases already described in the introduction.	
Spain - Centro Atención Urgencias y Emergencias 112 Extremadura	Yes. Border areas is very important (Extremadura-Portugal); Accidents with victims from different countries Europe, Emergency calls in other countries.	
Spain - Junta de Castilla y León	Yes, it could be useful for transmitting information and / or emergency situation status between different PSAPs.	
Spain - 112 Ceuta-Amgevecisa-Consejeris Presidencia, Gobernación y Empleo-Ciudad Autónoma de Ceuta	Yes. Not only more effectively, but necessary in a lot of situations. However, this database, in our opinion, would be official, and should contemplate the operational operation,	

	before the adoption.	
Spain - Dirección de Atención de Emergencias y Meteorología	Yes. It is more effective to do mobilization of necessary effectives to act in the emergency.	
Spain - Ciudad Autónoma de Melilla	Yes. Obviously, working with a European emergency numbers database of all countries, we must be able to reach the right option to solve the event wherever it takes place.	
Spain - CECOP SOS Rioja	Yes	
Spain–P.Asturias - 112 Asturias	Ok but yes, any further information "Reliable" is useful for emergencies, the problem are the procedures and training.	
Sweden - SOS Alarm Sverige AB	<p>Yes. The use cases of the ones mentioned in chapter 2 above that we envisage and in several cases also already experienced is mostly emergency calls with transnational element, emergency calls where network issues are experienced and occasionally, wrongly routed emergency calls from nomadic VoIP service. Wrongly routed emergency calls originating on corporate networks appear is more seldom. It should though be noted that we have no statistics on this.</p> <p>Important to note is the fact that such PSAP numbers also could be used for "internal" communication concerning crisis communication between PSAPs in different countries. A brilliant example on this is when the thunderstorm Derecho on the 8th of August 2010 hit Latvia, then moved on through Estonia and then hit Finland, this during a time span of just three hours. The consequences for Estonia and Finland would probably been lesser as they would have been given time to prepare. Now this heavy storm came as a surprise to all three countries. With accessible numbers to PSAPs in those countries, Latvia could have forewarned Estonia which in turn could have warned Finland.</p>	

2.9 QUESTION 5

Correctness of Information in the database: PT ES envisages that any such database would be provided with a protected interface to allow each PSAP the possibility to log in, enter and maintain its own contact information thereby placing the responsibility for the correctness of the information with each individual PSAP or a nominated PSAP within each country. The ECC or the ECO would not accept any responsibility for the correctness of the information in the database.

Do you agree with such an approach? If not, please provide your reasons in the "Remarks" field below.		
Country	Yes	No
Austria - Ministry of the Interior	Yes	
Belgium - Federal Public Service Interiors–Direction 112	Yes	
Bulgaria - Mol, Directorate National 112 System	Yes	
Croatia - National Protection and Rescue Directorate	Yes	
Czech Republic - General Directorate of Fire and Rescue Service	Yes	
Denmark - Danish National police, Center for emergency communication Copenhagen Fire Brigade	Yes	
Estonia - Estonian Emergency Response Centre	Yes. It sounds reasonable since it should assure that the information is up-to-date, since numbers may change and it is the fastest way to update the information.	
Finland - Emergency Response Centre Administration	Yes	
Greece - General Secretariat for Civil Protection (GSCP)	Yes. In principle, we agree with the approach the ECC not to bear the responsibility for the correctness of the information provided in the database by the national PSAPS. However, a central updating procedure might be foreseen by the ECC, so as to ensure that the information contained is sufficiently updated and reliable for use.	
Iceland - Neyðarlínan ohf. 112	Yes. Remarks: In today's fluid environment it is hard to see anything else work in the long run, you might want to include a periodic reminder to a contact in each country to re-verify the content for their PSAP.	
Ireland - ECAS	Yes	
Latvia - State Fire and Rescue Service	Yes	
Lithuania - Emergency Response Centre (Bendrasis pagalbos centras)	Yes. ERC agrees that correctness of the contact information is a responsibility of participating PSAPs. We also agree that ECC	

	(ECO) is a provider of a unified platform for placing PSAP contact information.	
Luxembourg – National Rescue Agency	Yes	
Malta - Ministry for Home Affairs and National Security	Yes N/A	
The Netherlands - National Police	Each Member state/PSAP has its own IT organization, responsible for the maintenance of the used national databases. The task as mentioned above is similar to that work.	
Norway - Police Shared Services (PSS)	Yes. Agree, but how to route calls to correct PSAP within a Country needs to be described in the solution.	
Romania - Special Telecommunications Service	Yes. Each database user (PSAP) should assume the correctness of the introduced data	
Slovak Republic - Ministry of Interior	We agree with the proposed division of duties and responsibilities.	
Slovenia - Administration of the Republic of Slovenia for Civil Protection and Disaster Relief	Yes	
Spain - Axencia Galega de Emerxencias	Yes	
Spain - SEIB112 - Balearic Islands	Yes	
Spain - 112 Comunitat Valenciana (Valencian Region)	Yes	
Spain - Centro Atención Urgencias y Emergencias 112 Extremadura	Yes, but it is important obligation of the PSAP, to maintain properly updated, and we checkups by the ECO compliance report PSAP (semiannual checkups).	
Spain - Junta de Castilla y León	Yes	
Spain - 112 Ceuta-Amgevecesa - Consejeris Presidencia, Gobernación y Empleo–Ciudad Autónoma de Ceuta	Yes We would prefer a nominated PSAP within each country.	
Spain - Dirección de Atención de Emergencias y Meteorología	Yes	
Spain - Ciudad Autónoma de Melilla	Yes	
Spain - CECOP SOS Rioja	No	
Sweden - SOS Alarm Sverige AB	Yes. It is only natural that each PSAP takes responsibility for leaving correct information and to update it if necessary. A wish is that a regular reminder to update is emailed to the contact person for each country/PSAP. It is also important that all PSAPs are notified as soon as a change is made in the database so that we can update action plans in our	

	operational system. The Swedish PSAPs doesn't actually use the EENA list today. The data in it is instead implemented in a plan in the operational system since it is here where all contacts/phone numbers is gathered.	
--	--	--

2.10 QUESTION 6

Use cases: Please refer to the use cases described in Section 2 above. The responses to this question will be considered when determining the terms and conditions for accessing and using the database.

Do you envisage that such a database could be beneficial in cases of:		
1) Emergency calls with transnational element?		
Country	Yes	No
Austria - Ministry of the Interior	Yes	
Belgium - Federal Public Service Interiors – Direction 112	Yes	
Bulgaria - Mol, Directorate National 112 System	Yes	
Croatia - National Protection and Rescue Directorate	Yes	
Czech Republic - General Directorate of Fire and Rescue Service	Yes	
Denmark - Danish National police, Center for emergency communication Copenhagen Fire Brigade	Yes Perhaps very few cases.	
Estonia - Estonian Emergency Response Centre	Yes	
Finland - Emergency Response Centre Administration	Yes	
Greece - General Secretariat for Civil Protection (GSCP)	Yes	
Iceland - Neyðarlínan ohf. 112	Yes. Remarks: As citizens become more used to the 112 as the only number in case of emergency, this may actually get even more use cases. For example concerned citizens over missing tourists, needing to get a hold of a local SAR/Police in a foreign country.	
Ireland - ECAS	Yes. While this is considered to be a very rare requirement, should the situation arise every effort should be made to appropriately route the call as quickly and efficiently as possible. Such a database will assist PSAPS in routing the call as quickly as possible.	
Latvia - State Fire and Rescue Service	Yes	
Lithuania - Emergency	Yes	

Response Centre (Bendrasis pagalbos centras)		
Luxembourg – National Rescue Agency	Yes	
Malta - Ministry for Home Affairs and National Security	Yes	
The Netherlands - National Police	Yes	
Norway - Police Shared Services (PSS)	Yes	
Romania - Special Telecommunications Service	Yes	
Slovak Republic - Ministry of Interior	Yes	
Slovenia - Administration of the Republic of Slovenia for Civil Protection and Disaster	Yes. We already have agreements in place with neighbouring countries (AT, IT, HR, HU).	
Spain - Axencia Galega de Emerxencias	Yes	
Spain - SEIB112 - Balearic Islands	Yes	
Spain - 112 Comunitat Valenciana (Valencian Region)	Yes	
Spain - Centro Atención Urgencias y Emergencias 112 Extremadura	Yes	
Spain - Junta de Castilla y León	Yes	
Spain - 112 Ceuta-Amgeveciesa - Consejeris Presidencia, Gobernación y Empleo–Ciudad Autónoma de Ceuta	Yes	
Spain - Dirección de Atención de Emergencias y Meteorología	Yes	
Spain - Ciudad Autónoma de Melilla	Yes	
Spain - CECOP SOS Rioja	Yes	
Spain–P.Asturias - 112 Asturias	Yes	
Sweden - SOS Alarm Sverige AB	Yes. It occurs quite regularly that a person calling from within Sweden is seeking help for another person abroad. For example we have had a person talking to his father by phone when his father, living abroad, suddenly gets unconscious. If we can't connect the caller to a PSAP in the concerned country this might be fatal.	
2) Emergency calls where network issues are experienced (inadvertent roaming)		
Country	Yes	No
Austria - Ministry of the Interior	Yes, but Austria has bilateral agreements with its neighbor countries already.	
Belgium - Federal Public Service Interiors–Direction	Yes. Bilateral agreements already exit.	

112		
Bulgaria - Mol, Directorate National 112 System	Yes	
Croatia - National Protection and Rescue Directorate	Yes	
Czech Republic - General Directorate of Fire and Rescue Service	Yes. There should be some mutual agreements of cooperation already in place.	
Denmark - Danish National police, Center for emergency communication Copenhagen Fire Brigade	Yes	
Estonia - Estonian Emergency Response Centre	Yes. Usually it means the cooperation between neighbor countries. In case there isn't agreement between them how to deal with such calls and they haven't shared contact details, the database would be extremely useful. (However, in Estonia we have agreements with our neighbor countries and effective cooperation with their PSAPs).	
Finland - Emergency Response Centre Administration	Yes	
Greece - General Secretariat for Civil Protection (GSCP)	Yes	
Iceland - Neyðarlínan ohf. 112	Yes. Remarks: This is of course not the case here in Iceland.	
Ireland - ECAS		<p>No. Inadvertent roaming (or just roaming) will only occur in cases where mobile networks and countries share a border. In such cases it is expected that the responsible PSAPs in the respective countries will have a bilateral agreement in place including the use of Dedicated e.164 numbers for such roaming calls.</p> <p>The use of dedicated e.164 numbers for this specific and limited case of inadvertent roaming (can only occur with adjacent countries) is preferable to the PSAP as it allows them to specifically identify (including for reporting and investigation purposes) such calls and implement the process agreed between the respective PSAPs for the handling of such calls.</p>
Latvia - State Fire and Rescue Service	Yes	
Lithuania - Emergency Response Centre	Yes	
Luxembourg - National Rescue Agency		No

Malta - Ministry for Home Affairs and National Security	Yes	
The Netherlands - National Police	Yes. In most cases, direct cross-border traffic and communication is already implemented between PSAPs of neighbouring countries.	
Norway - Police Shared Services (PSS)	Yes. Transfer call to Country B and provide COLP to Country B needed	
Romania - Special Telecommunications Service	Yes	
Slovak Republic - Ministry of Interior	Yes	
Slovenia - Administration of the Republic of Slovenia for Civil Protection and Disaster	Yes	
Spain - Axencia Galega de Emerxencias	Yes	
Spain - SEIB112 - Balearic Islands	Yes	
Spain - 112 Comunitat Valenciana (Valencian Region)	Yes. But not for us, we have not border with another countries.	
Spain - Centro Atención Urgencias y Emergencias 112 Extremadura	Yes	
Spain - Junta de Castilla y León	Yes	
Spain - 112 Ceuta-Amgevicesa - Consejeris Presidencia, Gobernación y Empleo–Ciudad Autónoma de Ceuta	Yes	
Spain - Dirección de Atención de Emergencias y Meteorología	Yes	
Spain - Ciudad Autónoma de Melilla		No
Spain - CECOP SOS Rioja	Yes	
Spain–P.Asturias - 112 Asturias	Yes	
Sweden - SOS Alarm Sverige AB	Yes. We already have calls coming to SOS Alarm in Sweden but originating from our neighbouring countries as described in figure 2 and therefore a cooperation with these countries.	
3) Wrongly routed emergency calls from nomadic VoIP services		
Country	Yes	No
Austria - Ministry of the Interior	Yes	
Belgium - Federal Public Service Interiors–Direction 112	Yes. However, this database should only be used in a last resort. Care should be taken that VOIP services providers continue to follow existing national obligations to deliver correct routing and identification even if manual routing by operators becomes possible.	
Bulgaria - Mol, Directorate National 112 System		No. PSAP's in Bulgaria cannot receive VoIP calls.
Croatia - National Protection	Yes	

and Rescue Directorate		
Czech Republic - General Directorate of Fire and Rescue Service	Yes	
Denmark - Danish National police, Center for emergency communication Copenhagen Fire Brigade	Yes	
Estonia - Estonian Emergency Response Centre	Yes	
Finland - Emergency Response Centre Administration	Yes	
Greece - General Secretariat for Civil Protection (GSCP)	Yes	
Iceland - Neyðarlínan ohf. 112	Yes	
Ireland - ECAS	Yes. This use case is expected to become more common in the future with the continued adoption of third party VoIP services.	
Latvia - State Fire and Rescue Service	Yes	
Lithuania - Emergency Response Centre	Yes	
Luxembourg - National Rescue Agency	Yes	
Malta - Ministry for Home Affairs and National Security	Yes	
The Netherlands - National Police	A new phenomenon expected to grow rapidly with increasing use of On Top Services and IP-telephony at very low pricing. (Holiday-traffic).	
Norway - Police Shared Services (PSS)	Yes. Which input (A-number, IP-address, name) to access from where? To forward Country B?	
Romania - Special Telecommunications Service	Yes. We have not identified such cases yet, but we consider the database would be beneficial for dealing with such cases.	
Slovak Republic - Ministry of Interior	Yes	
Slovenia - Administration of the Republic of Slovenia for Civil Protection and Disaster	Yes	
Spain - Axencia Galega de Emerxencias	Yes	
Spain - SEIB112 - Balearic Islands	Yes	
Spain - 112 Comunitat Valenciana (Valencian Region)		No
Spain - Centro Atención Urgencias y Emergencias 112 Extremadura	Yes	
Spain - Junta de Castilla y León	Yes	
Spain - 112 Ceuta-Amgevicesa - Consejeris	Yes	

Presidencia, Gobernación y Empleo–Ciudad Autónoma de Ceuta		
Spain - Dirección de Atención de Emergencias y Meteorología	Yes	
Spain - Ciudad Autónoma de Melilla		No
Spain - CECOP SOS Rioja	Yes	
Spain–P.Asturias - 112 Asturias	Yes	
Sweden - SOS Alarm Sverige AB	Yes. This happens not so often but might increase with time.	
4) Wrongly routed emergency calls originating on corporate networks		
Country	Yes	No
Austria - Ministry of the Interior	Yes, but low probability, as this would require transnational corporate networks, which are quite rare.	
Belgium - Federal Public Service Interiors–Direction 112	However, this database should only be used in a last resort. Care should be taken that VOIP services providers continue to follow existing national obligations to deliver correct routing and identification even if manual routing by operators becomes possible.	
Bulgaria - Mol, Directorate National 112 System	Yes. Till now, there are not received such type of calls.	
Croatia - National Protection and Rescue Directorate	Yes	
Czech Republic - General Directorate of Fire and Rescue Service	Yes	
Denmark - Danish National police, Center for emergency communication Copenhagen Fire Brigade	Yes	
Estonia - Estonian Emergency Response Centre	Yes. If those kinds of cases are possible, then yes.	
Finland - Emergency Response Centre Administration	Yes	
Greece - General Secretariat for Civil Protection (GSCP)	Yes	
Iceland - Neyðarlínan ohf. 112	Yes	
Ireland - ECAS	Yes	
Latvia - State Fire and Rescue Service	Yes	
Lithuania - Emergency Response Centre	Yes	
Luxembourg – National Rescue Agency	Yes	
Malta - Ministry for Home Affairs and National Security		No
The Netherlands - National Police	Yes. More likely to happen in smaller corporate networks with a minimal maintenance organization and lack of knowledge on specific aspects.	
Norway - Police Shared	Yes. Not a huge user group? Would	

Services (PSS)	any corporate network route calls outgoing from another country?	
Romania - Special Telecommunications Service	Yes. We have not identified such cases yet, but we consider the database would be beneficial for dealing with such cases	
Slovak Republic - Ministry of Interior	Yes	
Slovenia - Administration of the Republic of Slovenia for Civil Protection and Disaster	Yes. We already have agreements in place with neighbouring countries.	
Spain - Axencia Galega de Emerxencias	Yes	
Spain - SEIB112 - Balearic Islands	Yes	
Spain - 112 Comunitat Valenciana (Valencian Region)		No
Spain - Centro Atención Urgencias y Emergencias 112 Extremadura	Yes	
Spain - Junta de Castilla y León	Yes	
Spain - 112 Ceuta-Amgevicesa - Consejeris Presidencia, Gobernación y Empleo–Ciudad Autónoma de Ceuta	Yes	
Spain - Dirección de Atención de Emergencias y Meteorología	Yes	
Spain - Ciudad Autónoma de Melilla		No
Spain - CECOP SOS Rioja	Yes	
Spain–P.Asturias - 112 Asturias	Yes	
Sweden - SOS Alarm Sverige AB	Yes. We have no knowledge of if this is a problem today between countries, although it is a problem inside Sweden. If a corporate network isn't properly configured, a 112 call is registered coming from another part of Sweden (where the switchboard is situated) than where the caller is made from. But this might be a future problem also transnational.	
5) Third Party e-Call		
Country	Yes	No
Austria - Ministry of the Interior	Yes, Austria has already several agreements with operators of "e-Call-like" proprietary services; including Third Party Call Centres can be considered on a contractual basis with definition of confidentiality rules, etc.	
Belgium - Federal Public Service Interiors–Direction 112		No. Legislation requires third party registration. After registration they will receive a

		direct PSAP number.
Bulgaria - Mol, Directorate National 112 System	Yes. eCall service in Bulgaria is now at development. We are participants in HeERO 2 and HeERO 3 projects.	
Croatia - National Protection and Rescue Directorate	Yes	
Czech Republic - General Directorate of Fire and Rescue Service		No. Third parties will not be able to access the database nor will be included in database.
Denmark - Danish National police, Center for emergency communication Copenhagen Fire Brigade		No. All third party companies need to have an agreement with the Danish PSAP before getting the our long number for the PSAP.
Estonia - Estonian Emergency Response Centre		No. TPS eCall always need an agreement between 112 service provide and TPS. Our opinion is that this database cannot cover the TPS eCall topic.
Finland - Emergency Response Centre Administration	Yes	
Greece - General Secretariat for Civil Protection (GSCP)	Third Party eCall Centers need for their normal operation to have access to such a database, so as to communicate with the appropriate PSAPs in each country. However, taking into consideration the current status of the TPS in Europe and the fact that they are not considered PSAPs by definition, we have the opinion that any decision about including them as users in the database should be made at a later stage.	
Iceland - Neyðarlínan ohf. 112	Yes. Remarks: In a way this is already happening with f-ex OnStar.	
Ireland - ECAS		No. We consider that specific agreements should be in place between national PSAPs and TPSP eCall services. This is to ensure that appropriate processes are developed for call handling and that such calls can be measured (quality) and reported on by the PSAP. The use of specific agreements and processes between TPSPs and PSAPS suggests that it is more appropriate to use individual and dedicated e.164 numbers for the TPSP to route calls to each PSAP than general e.164 international access numbers as would be contained in the database.
Latvia - State Fire and Rescue Service	Yes	
Lithuania - Emergency Response Centre	Yes	
Luxembourg – National Rescue Agency		No
Malta - Ministry for Home Affairs and National Security	Yes	
The Netherlands - National Police	Yes. Only used as a fall-back infrastructure. Member States have to ensure that TPS communication is well embedded in the national PSAP	

	infrastructure-interface.	
Norway - Police Shared Services (PSS)	Yes	
Romania - Special Telecommunications Service		No. The TPSP eCalls have to comply with the applicable standards which assume the automatic transmission of the MSD simultaneously with the voice call. Therefore we deem necessary that the relation TPSP-PSAP responsible for the intervention should be decreed by cooperation agreements which should include the compulsory transmission of the MSD. As this procedure lacks, the use of a PSAP acting as intermediary results in the increase of the reaction time if the MSD information has been sent only via voice call.
Slovak Republic - Ministry of Interior	Yes	
Slovenia - Administration of the Republic of Slovenia for Civil Protection and Disaster	Yes. We need a signed agreement with third parties beforehand	
Spain - Axencia Galega de Emerxencias	Yes	
Spain - SEIB112 - Balearic Islands	Yes	
Spain - 112 Comunitat Valenciana (Valencian Region)		No
Spain - Centro Atención Urgencias y Emergencias 112 Extremadura	Yes	
Spain - Junta de Castilla y León	Yes	
Spain - 112 Ceuta-Amgevicesa - Consejeris Presidencia, Gobernación y Empleo-Ciudad Autónoma de Ceuta	Yes	
Spain - Dirección de Atención de Emergencias y Meteorología	Yes	
Spain - Ciudad Autónoma de Melilla	Yes. We don't have experience about this option, but if this is the final option, it'll be right.	
Spain - CECOP SOS Rioja	Yes	
Spain-P.Asturias - 112 Asturias	Yes	
Sweden - SOS Alarm Sverige AB		No. We do not see that this database would be used for TPS services since we want to regulate this service by agreements with the concerned Third Party Service providers and thus giving them specific long

		numbers to the PSAPs. This gives us a possibility to see already in the number presentation which TPS are calling and adapt specific action plans for the TPS.
6) Other cases (Please describe your use case in the “Remarks”)		
Country	Yes	No
Austria - Ministry of the Interior		No
Bulgaria - Mol, Directorate National 112 System		No
Croatia - National Protection and Rescue Directorate		No
Estonia - Estonian Emergency Response Centre	Yes. In some cases it could help in translation questions.	
Iceland - Neyðarlínan ohf. 112	Yes. See the top bullet, If the community of PSAPs is really committed to service, other cases will emerge.	
Ireland - ECAS	<p>Yes. Roaming SMS</p> <p>While SMS to 112 is effectively still unregulated at an EU level, it is now widely available across the EU. The fundamental limitation of SMS to 112 is that SMS messages sent by a subscriber while roaming are always transported by the SMSC on their “home” network which will be configured to forward SMS messages to the “home” PSAP.</p> <p>This means when a roaming user sends an SMS to 112 this will be received by the PSAP in their home network country and not in the country where they are roaming.</p> <p>Once the PSAP operator in the “home” country establishes that the texter is in fact roaming in another country, these messages could be effectively handled by their home country PSAP operator setting up a voice relay to the PSAP in the callers roaming country using the appropriate e.164 number from this database.</p>	
Latvia - State Fire and Rescue Service	Yes	
Lithuania - Emergency Response Centre	Yes. As mentioned above in Q.4 – translation of a problem.	
The Netherlands - National Police	Consultation/conference call: in case of a multilingual misunderstanding or complex emergency call to get the right information for an effective handling of the emergency.	
Malta - Ministry for Home Affairs and National Security	N/A	
Romania - Special Telecommunications Service		No
Slovak Republic - Ministry of Interior		No
Slovenia - Administration of the Republic of Slovenia for	Yes. Relatives or friends calling in the name of the person in need.	

Civil Protection and Disaster		
Spain–P.Asturias - 112 Asturias	Yes. Question 2 and 4	
Sweden - SOS Alarm Sverige AB		No. It is also important to stress that this should be numbers only available to the PSAPs for connecting emergency calls from the public. There are more and more commercial actors, mostly different kinds of alarm centers, that are situated in one country but handling customers in another. We here see that it not would be suitable to use the database for such regular business which might bring costs for the PSAP organization that rather should be regulated in agreements between the PSAP and the company. SOS Alarm has for example had a dialogue with .two such companies in this matter during 2014.

2.11 QUESTION 7

Would you prefer that the Database consists of: (Please choose and explain why in the “Remarks” field)		
1) Only one “primary PSAP” per country?		
Country	Yes	No
Austria - Ministry of the Interior	Yes	
Belgium - Federal Public Service Interiors–Direction 112	Yes. It has to be clear which languages is spoken in the PSAP.	
Czech Republic - General Directorate of Fire and Rescue Service	Yes. It is not possible for operator to determine area of responsibility of PSAP in foreign country. There should be one contact point for country that handles intra-national information forwarding.	
Denmark - Danish National police, Center for emergency communication Copenhagen Fire Brigade		No
Finland - Emergency Response Centre Administration	Yes. Content on 112-call can concern multiple emergency authorities and can be called from anywhere in a foreign country. It would be impossible to figure out the right PSAP to get contact to.	
Greece - General Secretariat for Civil Protection (GSCP)	Greece has only one 112 PSAP operating	
Iceland - Neyðarlínan ohf. 112	Yes. The local organizations can be very complex, and we need to keep this simple.	
Ireland - ECAS	Yes. Provided that that PSAP has the capability to handle and route emergency calls for any region in the country.	
Latvia - State Fire and Rescue Service	Yes	
Lithuania - Emergency Response Centre		No
Luxembourg – National Rescue Agency	Yes	
Malta - Ministry for Home Affairs and National Security	Yes. Malta has only one primary PSAP and not others are envisaged.	
The Netherlands - National Police	Yes. Geographical complexity hinders effectiveness.	
Norway - Police Shared Services (PSS)		No. We use geographical routing, and responsibility of resources (and logging the task) are local within a district. If only one (or one plus backup) shall be the solution we need to address this to the police directorate and run it through them (organizational not how we operate, employees unions to agree etc.).
Romania - Special Telecommunications Service	Yes. The 112 operators using the database should not choose a certain PSAP located in the respective state, they should use a	

	single number. We consider that it is the responsibility of the respective state to set forth its internal rules and operational procedures to deal with this type of emergency reporting.	
Slovak Republic - Ministry of Interior		No. Disagree, there always should be a “backup”, to be prepared f.e. : power outage, no connection etc.
Slovenia - Administration of the Republic of Slovenia for Civil Protection and Disaster	Yes Due to organizational structure.	
Spain - Axencia Galega de Emerxencias	Yes. Since in Spain there are 17 PSAPs and each one has its own area of coverage, from a foreign country it will be difficult to know which of them would be responsible for handling the emergency call. For this reason, the most effective solution is to have only one primary PSAP per country. This PSAP must meet their inter-PSAP communications needs. The challenge is to choose the primary PSAP. We think that the primary PSAP must be Madrid because it is the capital and also the most important PSAP of Spain.	
Spain - SEIB112 - Balearic Islands		No
Spain - 112 Comunitat Valenciana (Valencian Region)		No In Spain there are now 19 PSAP
Spain - Junta de Castilla y León		No
Spain - 112 Ceuta-Amgevecesa - Consejeris Presidencia, Gobernación y Empleo–Ciudad Autónoma de Ceuta	Yes	
Spain - Dirección de Atención de Emergencias y Meteorología		No
Spain - CECOP SOS Rioja	Yes	
Spain–P.Asturias - 112 Asturias	Ok. What is the difference (see 7.4)	
Sweden - SOS Alarm Sverige AB	Yes. Preferably since this makes it easy to connect an emergency call to another country without having to consider geographical area that a specific PSAP covers which can be impossible to identify.	
2) One primary PSAP plus one back-up PSAP per country?		
Country	Yes	No
Austria - Ministry of the Interior	Yes. How many backup PSAPs are possible depends on the database structure (up to 10 backup PSAPs).	
Belgium - Federal Public Service Interiors–Direction 112	Yes. It has to be clear which languages is spoken in the PSAP.	
Bulgaria - Mol, Directorate National 112 System	Yes	
Croatia - National Protection	Yes. The database could provide	

and Rescue Directorate	effective information management.	
Czech Republic - General Directorate of Fire and Rescue Service		No
Denmark - Danish National police, Center for emergency communication Copenhagen Fire Brigade	Yes. Single point of contact and you have a back-up solution.	
Estonia - Estonian Emergency Response Centre	Since 112 systems all over Europe are different and it is not easy task for call-takers to be aware of every geographical detail of other country (which PSAP serves which area and where exactly is the scene of accident etc.), it is easier to have one main contact from each country (and back-up if this PSAP is not available).	
Finland - Emergency Response Centre Administration		No
Iceland - Neyðarlínan ohf. 112		No
Ireland - ECAS	Yes. An additional backup number should be available for reasons of availability, redundancy and resilience however this does not necessarily have to be a separate PSAP organization and should be subject to the same availability requirements as for emergency calls places from anywhere in that country.	
Latvia - State Fire and Rescue Service	Yes	
Lithuania - Emergency Response Centre	Yes. We prefer this model, however we aware that it would be complicated for larger countries to have only primary and back-up PSAP for a whole country. But this model would be preferable.	
Luxembourg – National Rescue Agency		No
Malta - Ministry for Home Affairs and National Security	N/A	
The Netherlands - National Police	Yes. Always beneficial to have a back-up.	
Norway - Police Shared Services (PSS)		No. We use geographical routing, and responsibility of resources (and logging the task) are local within a district. If only one (or one plus backup) shall be the solution we need to address this to the police directorate and run it through them (organizational not how we operate, employees unions to agree etc.)
Romania - Special Telecommunications Service		No
Slovak Republic - Ministry of Interior	Yes. It is a relevant safety measure.	

Spain - SEIB112 - Balearic Islands		No
Spain - 112 Comunitat Valenciana (Valencian Region)		No
Spain - Junta de Castilla y León		No
Spain - Dirección de Atención de Emergencias y Meteorología		No
Spain - Ciudad Autónoma de Melilla	Yes	
Spain - CECOP SOS Rioja		No
Sweden - SOS Alarm Sverige AB		No. The best solution is to one PSAP number. This number could in turn be handled in two or more PSAPs. In Sweden is for example the 13 PSAPs handling emergency calls interconnected and divided into three regions where emergency calls in that region is handled by all the PSAPs situated there. Another solution could be an automatic rerouting of the number to a secondary PSAP in case of a disturbance in the primarily. If there is one primarily number and a secondary, it is hard to know how long you should be waiting for answer before using the secondary.
3) As many PSAPs that each country wants to register?		
Country	Yes	No
Austria - Ministry of the Interior		No. It seems to be somewhat impossible to identify the geographically or organizationally responsible PSAP of a foreign country. (example: How could a 112-caller from Austria identify, which of the maybe 100 PSAP's in France is the correct one?)
Belgium - Federal Public Service Interiors–Direction 112		No. It is impossible for an operator to understand the emergency legislation and organization in all participating countries, so as to always select the right PSAP to call. This option should therefore be excluded.
Czech Republic - General Directorate of Fire and Rescue Service		No
Denmark - Danish National police, Center for emergency communication Copenhagen Fire Brigade		No. See above
Finland - Emergency Response Centre Administration		No
Iceland - Neyðarlínan ohf. 112		No
Ireland - ECAS	Yes. For access to the database only but not as the primary contact PSAP.	

Latvia - State Fire and Rescue Service		No
Lithuania - Emergency Response Centre	Yes. This one is better than nothing, however might cause wrong dials (addresses) due to unawareness of receiving country's PSAP system.	
Luxembourg – National Rescue Agency		No
Malta - Ministry for Home Affairs and National Security	N/A	
The Netherlands - National Police		No. Geographical complexity hinders effectiveness.
Norway - Police Shared Services (PSS)	Yes. We use geographical routing, and responsibility of resources (and logging the task) are local within a district. If only one (or one plus backup) shall be the solution we need to address this to the police directorate and run it through them (organizational not how we operate, employees unions to agree etc.).	
Romania - Special Telecommunications Service		No
Slovak Republic - Ministry of Interior		No. There should be one primary contact point per state to avoid confusion among 112 call takers when routing the calls.
Slovenia - Administration of the Republic of Slovenia for Civil Protection and Disaster	Yes To allow flexibility	
Spain - SEIB112 - Balearic Islands	Yes, It would be a more complicated approach in terms of the data and mechanisms needed to precisely locate the target PSAP, but once addressed this approach would permit a more direct and effective access to the target PSAP which is very important in emergency management.	
Spain - 112 Comunitat Valenciana (Valencian Region)		No
Spain - Junta de Castilla y León	Yes	
Spain - Dirección de Atención de Emergencias y Meteorología	Yes	
Spain - CECOP SOS Rioja		No
Sweden - SOS Alarm Sverige AB		No. One PSAP is strongly preferred since it is hard to consider geographical area that a specific PSAP covers and in certain cases also which kind of PSAP (police, EMS, Fire rescue service, carabinieri etc.) who is responsible. Though risk that possible demand to register no more than one PSAP could be an obstacle for certain countries for

		participating in the database. The conditions differ for PSAPs in each European country.
4) Only PSAPs handling 112 calls		
Country	Yes	No
Austria - Ministry of the Interior	Yes	
Czech Republic - General Directorate of Fire and Rescue Service		No
Denmark - Danish National police, Center for emergency communication Copenhagen Fire Brigade	Yes	
Finland - Emergency Response Centre Administration	Yes	
Greece - General Secretariat for Civil Protection (GSCP)	Yes. Since the 112 model structure varies in Europe, each country should primarily allowed to register in the database all PSAP information it considers necessary, however the whole designing of the database should be done with the view to ultimately facilitate the correct routing of the 112 call to the most appropriate PSAP in a different country.	
Iceland - Neyðarlínan ohf. 112		No
Ireland - ECAS	Yes	
Latvia - State Fire and Rescue Service		No
Lithuania - Emergency Response Centre		No
Luxembourg – National Rescue Agency	Yes	
Malta - Ministry for Home Affairs and National Security	N/A	
The Netherlands - National Police		No. All relevant PSAPs and TPSs for effective communication.
Norway - Police Shared Services (PSS)	Yes. We use geographical routing, and responsibility of resources (and logging the task) are local within a district. If only one (or one plus backup) shall be the solution we need to address this to the police directorate and run it through them (organizational not how we operate, employees unions to agree etc.).	
Romania - Special Telecommunications Service	Yes	
Slovak Republic - Ministry of Interior	Yes. Only 112 calls or calls to national emergency numbers should be routed via database.	
Spain - SEIB112 - Balearic Islands	Yes. In fact this would depend on the particular implementation of 112 services in each country.	

	Taking into account how 112 services are implemented in Spain I would rather prefer this option.	
Spain - 112 Comunitat Valenciana (Valencian Region)	Yes	
Spain - Centro Atención Urgencias y Emergencias 112 Extremadura	Yes. For consistency with the model established in Spain, it is necessary to level of Spain, set one for each Autonomous Community, 19.	
Spain - Junta de Castilla y León	Yes. Since there is a Centre in Spain for each region, the ideal would be to have a database for each of the existing centers, but only those that support 112 calls.	
Spain - Dirección de Atención de Emergencias y Meteorología	Yes	
Spain - CECOP SOS Rioja		No
Spain-P.Asturias - 112 Asturias	What is the difference (see 7.1).	
Sweden - SOS Alarm Sverige AB	Yes. It should be a database exclusively for official PSAPs (see answer on question 6, "Other cases").	

NOTE ON QUESTION 7: For the purposed of designing the database it is important to understand if the database should contain a primary PSAP in each country or information on all PSAPs. The current EENA solution contains only a primary PSAP in each country. It is a matter for the PSAPs to advise on the most effective solution to meet their inter-PSAP communications needs. PT ES recognises the operational challenges that might be involved with having too many entries for each country in the database. This is related to the determination of the correct PSAP which has to be done in the destination country and by its rules. PT ES is seeking feedback in response to Question 8 on how best to address those challenges.

2.12 QUESTION 8

The PT ES recognises that the organisation of emergency services is of the exclusive national competence of each CEPT Member State and it has no intention to interfere with PSAP operations in any way. Do you think that the ECC, by hosting such a database, interferes in a negative way with the operation of the emergency services in your country?		
Country	Yes	No
Austria - Ministry of the Interior		No
Belgium - Federal Public Service Interiors–Direction 112		No
Bulgaria - Mol, Directorate National 112 System		No
Croatia - National Protection and Rescue Directorate		No
Czech Republic - General Directorate of Fire and Rescue Service		No
Denmark - Danish National police, Center for emergency communication Copenhagen Fire Brigade	Yes	
Estonia - Estonian Emergency Response Centre		No
Finland - Emergency Response Centre Administration		No

Greece - General Secretariat for Civil Protection (GSCP)		No
Iceland - Neyðarlínan ohf. 112		No. That is probably the only way to get all states to comply.
Ireland - ECAS		No
Latvia - State Fire and Rescue Service		No
Lithuania - Emergency Response Centre		No. This doesn't interfere with our operations as ECC wouldn't perform any PSAP operation by only maintaining a database of PSAP telephone numbers.
Luxembourg – National Rescue Agency		No
Malta - Ministry for Home Affairs and National Security		No N/A
The Netherlands - National Police		No. The PT ES provides a tool for effective transnational communication, free to use. Each member state has to implement relevant legislation on the aspects of responsibility, continuity, performance, privacy etc.
Norway - Police Shared Services (PSS)		No. But if Norway is to participate we need to be ok with the solution for example how we access the database (automatic/manual access to information and transfer possibilities), and how we route calls based on geographical information available.
Romania - Special Telecommunications Service		No
Slovak Republic - Ministry of Interior		No
Slovenia - Administration of the Republic of Slovenia for Civil Protection and Disaster		No. However, calls transferred like described in Chapter 2 will automatically have lesser priority to direct calls to 112 in country which means time delay.
Spain - Axencia Galega de Emerxencias		No
Spain - SEIB112 - Balearic Islands		No, Not negatively but indeed it will be needed to create internal protocols in each PSAP to use this database.
Spain - 112 Comunitat Valenciana (Valencian Region)		No
Spain - Centro Atención Urgencias y Emergencias 112 Extremadura	Depend on how the database is made, it must respect the model 112 implemented in each country	
Spain - Junta de Castilla y León		No
Spain - 112 Ceuta-Amgevesa - Consejeris Presidencia, Gobernación y Empleo–Ciudad Autónoma de Ceuta	Yes. Much responsibility without a clear and legal framework nor an operational situation organized and implemented.	
Spain - Dirección de Atención de Emergencias y Meteorología		No

Spain - Ciudad Autónoma de Melilla		No
Spain - CECOP SOS Rioja		No
Spain–P.Asturias - 112 Asturias		OK.....???
Sweden - SOS Alarm Sverige AB		No. Since the PSAP still will be responsible for the content this should not interfere in any way with the PSAP operation. This though presumes that the numbers is available only to other PSAPs dealing with 112.

2.13 QUESTION 9

Question 9 is addressed only to those PSAPs who, at this stage, consider that they will not participate in the database project.

Do you envisage that the implementation of a database, on a voluntary basis, will have an impact on your activities?		
Country	Yes	No
Austria - Ministry of the Interior		No. Not applicable, as Austria will most probably participate.
Belgium - Federal Public Service Interiors–Direction 112	N/A	
Denmark - Danish National police, Center for emergency communication Copenhagen Fire Brigade		No. We already operates with a similar DB.
Iceland - Neyðarlínan ohf. 112	Yes. Remarks: In the long run they will jump on, but not until after a few well publicized blunders.	
Luxembourg – National Rescue Agency	Yes	
Spain - SEIB112 - Balearic Islands		No
Spain - 112 Comunitat Valenciana (Valencian Region)		No
Spain - 112 Ceuta-Amgevecesa - Consejeris Presidencia, Gobernación y Empleo–Ciudad Autónoma de Ceuta	Yes. See remarks on question 8. Potential legal problems.	
Spain - CECOP SOS Rioja	Yes	

2.14 QUESTION 10

Would you be interested in participating in drafting the terms and conditions for access and use of such a database?		
Country	Yes	No
Austria - Ministry of the Interior		No
Belgium - Federal Public Service Interiors–Direction 112	Reviewing terms and conditions is advisable to ensure they are not in conflict with national legislation.	
Bulgaria - Mol, Directorate National 112 System	Yes	
Croatia - National Protection	Yes	

and Rescue Directorate		
Czech Republic - General Directorate of Fire and Rescue Service	Yes	
Denmark - Danish National police, Center for emergency communication Copenhagen Fire Brigade	Yes	
Estonia - Estonian Emergency Response Centre	Yes	
Finland - Emergency Response Centre Administration		No
Greece - General Secretariat for Civil Protection (GSCP)		No
Iceland - Neyðarlínan ohf. 112		No. Remarks: Not particularly, I am sure there are more capable and eager people out there. Just remember to have simplicity as a goal.
Ireland - ECAS	Yes	
Latvia - State Fire and Rescue Service		No
Lithuania - Emergency Response Centre	Yes	
Luxembourg – National Rescue Agency		No
Malta - Ministry for Home Affairs and National Security	Yes. Malta considers that the drafting of the terms and conditions for access and use of the said database is important. Thus, Malta would like to be involved and definitely be consulted on this issue.	
The Netherlands - National Police	Yes. The National Police is especially interested in the specifications about security of the database to prevent hacking and the authentication and authorisation of the specific users to prevent misuse.	
Norway - Police Shared Services (PSS)	Yes. Cost issue is unclear and it is a factor that needs to be estimated (also resource allocation/period).	
Romania - Special Telecommunications Service	Yes. We consider that the presence of STS (as PSAP administrator) is mandatory within the workgroup establishing the conditions for access and use of the database.	
Slovak Republic - Ministry of Interior	Yes. We would like to participate in drafting the terms and conditions for access.	
Slovenia - Administration of the Republic of Slovenia for Civil Protection and Disaster		No
Spain - Axencia Galega de Emerxencias		No
Spain - SEIB112 - Balearic Islands	Yes	

Spain - 112 Comunitat Valenciana (Valencian Region)	Yes	
Spain - Centro Atención Urgencias y Emergencias 112 Extremadura	Yes	
Spain - Junta de Castilla y León	Yes	
Spain - 112 Ceuta-Amgeveciesa - Consejeris Presidencia, Gobernación y Empleo–Ciudad Autónoma de Ceuta		No
Spain - Dirección de Atención de Emergencias y Meteorología	Yes	
Spain - Ciudad Autónoma de Melilla	Yes	
Spain - CECOP SOS Rioja		No
Spain–P.Asturias - 112 Asturias	?? In my opinion... should be an "open" format and in any case data should be able to be exported to a compatible format (MS office, BD Access, Excel products).	
Sweden - SOS Alarm Sverige AB		No

2.15 QUESTION 11

Considering that in some countries emergency caller are not identifiable (e.g. SIM-Less calls) how should cases of false alarms or fraud be treated? Please provide comments.	
Country:	Comments:
Austria - Ministry of the Interior	That is to be solved in the country (A) where the call occurs and not in the country (B) where the communicated emergency situation happens. The PSAP of country (B) should inform PSAP in country (A) that this was a false/fraud call.
Belgium - Federal Public Service Interiors–Direction 112	False alarms or fraud should be treated according to the procedures and possible legal actions of the country where the call is received.
Bulgaria - Mol, Directorate National 112 System	MNO In Bulgaria don't routed SIM-less calls to 112.
Czech Republic - General Directorate of Fire and Rescue Service	The question is not relevant to issue of PSAP number database hosting.
Denmark - Danish National police, Center for emergency communication Copenhagen Fire Brigade	As they are treated today in each country.
Estonia - Estonian Emergency Response Centre	It's too complicated question and the situations are too different.
Finland - Emergency Response Centre Administration	Cases of false alarms or fraud should be treated according to local legislation.
Greece - General Secretariat for Civil Protection (GSCP)	N/A
Ireland - ECAS	SIM-Less/No-CLI mobile calls can only be made from supporting mobile networks in country. Should a caller from such a device indicate that they require assistance in a different country this should be considered technically impossible and as a result the call should be handled locally as per the normal fraudulent call procedures. These calls should not be internationally routed by the PSAP under any circumstances.
Latvia - State Fire and Rescue Service	Latvian mobile Network operators ensure SIM-Less call to 112. In Latvia, we haven't special legislation concerning false calls, so we haven't comments on that.

Lithuania - Emergency Response Centre	There is always room for inappropriate calls. A number of such calls may be filtered out by first stage PSAP by evaluating caller's information, way of speaking, and awareness of the situation he knows. This however isn't 100 percent preventable.
Luxembourg – National Rescue Agency	Non beaurocratic-quick investigation by police an punished via legislation.
Malta - Ministry for Home Affairs and National Security	This depends on the legislation in vigore in the different Member States.
The Netherlands - National Police	Comments: Countering false alarms or fraud stays within the national jurisdiction and legislation of each member state. The handling of transnational emergency calls will be a non-standard procedure with extra care and attention. The risk of false alarms or fraud will not outweigh the benefits of the possibility of direct transnational communication for emergency services.
Norway - Police Shared Services (PSS)	IMEI number lookup in regards of positioning has been discussed in Norway and technically we should look into possibilities/implemented solutions in different Countries.
Romania - Special Telecommunications Service	In Romania it is not possible to make a call to 112 from SIM-Less devices, however there are pre-paid SIM cards which are not associated to a caller. If such a call is received, it would be treated in a similar manner to the calls for which the caller had been identified according to the existing procedures.
Slovak Republic - Ministry of Interior	Calls should be recorded and archived for future evaluation and as evidence in cases of felony as other emergency calls. Legal aspects of transnational false alarms and fraudulent calls warrant a legal research. The results of research should be made available to the participating states in form of recommendation.
Slovenia - Administration of the Republic of Slovenia for Civil Protection and Disaster Relief	SIM-Less calls are not possible in Slovenia.
Spain - Axencia Galega de Emerxencias	We don't understand the purpose of this question.
Spain - SEIB112 - Balearic Islands	Each PSAP handles false alarms with their own protocols and the indeed apply equally in trans-PSAP calls. In our service we receive non-identified calls and we will follow the same discrimination protocol independently of the destination or nature of the call.
Spain - 112 Comunitat Valenciana (Valencian Region)	With different local laws.
Spain - Centro Atención Urgencias y Emergencias 112 Extremadura	Obligation on all countries to identify long terminal 112 (e-mei), and administrative and / or penal sanction depending on the severity of the malicious call to the caller and / or owner of the terminal.
Spain - Junta de Castilla y León	It could be treated in the same way we do today. If you have the certainty that it is a false alarm or fraud, it would be classified as such, and no notice could be transmitted to the country PSAP. In case you have any doubt about the veracity of the call, it will be transferred to the PSAP affected, indicating that the call could be a false alarm or frauds call.
Spain - 112 Ceuta-Amgevicesa - Consejeris Presidencia, Gobernación y Empleo–Ciudad Autónoma de Ceuta	There should be a common mode of action or a system uniform of operation among all member countries of the EC to treat this type of calls, at least.
Spain - Dirección de Atención de Emergencias y Meteorología	We have rules about it. It is punished.
Spain - Ciudad Autónoma de Melilla	Only the same position in all Europeans countries in these cases, will give the answer. With actual situation (every country has its own position) we think it won't be possible.
Spain–P.Asturias - 112 Asturias	Only with the cooperation of the operators and legislate that it is forced to deliver data of the number caller - IMEI - SIM or any parameter identification; In addition to a geo localization more accurate (3 G / 4 G, allow it).

Sweden - SOS Alarm Sverige AB	It is always a problem to separate false calls from actual emergencies. Therefore all calls must be treated as actual emergencies. In this case the responding PSAP must do a first filtering and then connect calls to the PSAP abroad which then will make the final judgement and "second opinion".
-------------------------------	--

2.16 QUESTION 12

Do you have any other comments to the issue at hand? (If yes, please explain)		
Country:	Yes	No
Austria - Ministry of the Interior	Yes. Regulation needs to be established, that PSAPs are not allowed to pass numbers from the database to others than PSAPs or governmental organisations (e.g. embassies, etc.).	
Belgium - Federal Public Service Interiors–Direction 112	Yes - An email address of each PSAP in the database should also be included in the database. - A subscription to the database with automatic notification of telephone number/email address changes is necessary. - The database should not be obligatory to use by operators of a 112 PSAP, but should only be considered a useful tool for exceptional cases.	
Bulgaria - Mol, Directorate National 112 System		No
Croatia - National Protection and Rescue Directorate		No
Czech Republic - General Directorate of Fire and Rescue Service		No
Denmark - Danish National police, Center for emergency communication Copenhagen Fire Brigade		No
Estonia - Estonian Emergency Response Centre		No
Finland - Emergency Response Centre Administration	Yes. Such a database could help us to carry out the duties of PSAPs more effectively, assuming that the information in the database are up to date and consists only one "primary PSAP" per country. Also access to database should be reliable and easy, so that needed PSAP number would be available when needed in acute situation.	
Greece - General Secretariat for Civil Protection (GSCP)	N/A	
Iceland - Neyðarlínan ohf. 112		No
Ireland - ECAS	There is a wider or more general case of fraud/attack which must be considered when access to the PSAP is facilitated by internationally	

	<p>accessible E.164 numbers. Once the database is accessible to all PSAPS access is effectively uncontrolled as it only requires one disgruntled or mal-intentioned PSAP employee in one country to release the numbers to criminal or disruptive groups.</p> <p>Should these numbers fall into the wrong hands all national PSAPS are vulnerable to untraceable and difficult to control fraud and indeed attack in the form of:</p> <p>False information from individuals or groups claiming to be a national PSAP operator resulting in the misdirection of the local emergency services.</p> <p>TDOS (telephony denial of service) in the form of a flood of calls from another country which swamps the resources of the local PSAP and results in normal national emergency calls not being answered.</p> <p>PSAPS providing access to their services using internationally accessible E.164 numbers should be aware of these vulnerabilities and take appropriate steps to prevent and mitigate such attacks.</p>	
Latvia - State Fire and Rescue Service		No
Lithuania - Emergency Response Centre		No
Malta - Ministry for Home Affairs and National Security		No
Romania - Special Telecommunications Service	<p>Yes. We consider that the inter-PSAPs access to the database should be allowed only to 112 PSAPs and, according to the terms and conditions for the use of this database, the eCalls should be retransmitted with the associated MSD.</p> <p>Please provide us further details about the participation of the TPSP eCall centers in the establishment of and access to the database.</p>	
Slovak Republic - Ministry of Interior	<p>Yes. The database contains a sensitive information so we would like to be informed in detail about safety measures concerning the database.</p>	
Spain - Axencia Galega de Emerxencias		No
Spain - SEIB112 - Balearic Islands		No
Spain - Centro Atención Urgencias y Emergencias 112 Extremadura	<p>Yes</p> <p>It's a great initiative, all 112 of different countries should be involved, and must be interoperable data base with all emergency management systems and</p>	

	implemented various emergency 112.	
Spain - Junta de Castilla y León		No
Spain - Dirección de Atención de Emergencias y Meteorología		No
Spain–P.Asturias - 112 Asturias	Idem Q11. Operators (mobile and fixed) provide their users in a unique and open format B.D.; You should be required by the national body or competent EU. The format of user data is currently quite chaotic.	
Sweden - SOS Alarm Sverige AB	Yes It can be noted that the public expects a PSAP to be able to connect to PSAPs abroad if needed in an emergency. SOS Alarm regularly gets such views from the public. Therefore it is a natural and necessary step to exchange contact information between European PSAPs.	

3. RESULTS OF THE SECOND QUESTIONNAIRE

3.1 INTRODUCTION

On 24 June 2015, the Chairman of the CEPT/ECC Working Group Numbering and Networks (WG NaN) Mr. Johannes Vallesverd, circulated a questionnaire on the subject "Addressing transnational emergency calls in Europe". You responded to this questionnaire and WG NaN sincerely thanks you for your considered feedback.

32 responses to the questionnaire were received from 23 CEPT member countries and the vast majority of the responses were positive to the idea of the European Communications Office (ECO - the permanent office of the CEPT/ECC) hosting a database containing long form E.164 telephone numbers to facilitate inter-PSAP communications in Europe. Based on the information received, CEPT/ECC is now preparing a Feasibility Study on the matter.

One respondent stated, after coordination had taken place at the national level, that it has in principle a positive attitude towards such a database but certain conditions must be met before it would be in a position to participate including that the European Commission compulsively mandates the participation of all Member States via a European legislative process. One other respondent stated that there needs to be a proper legal basis for the database.

The CEPT/ECC proposal for the database is envisaged to be voluntary for the relevant PSAP administrations in any of the 48 CEPT member countries willing to participate. This voluntary approach is foreseen as CEPT/ECC has no mandate to oblige any private or public party to meet obligations defined by it. e.g. obliging PSAPs to participate. It should be noted however that CEPT/ECC does maintain a database containing frequency information ([EFIS](#)) which started out on a voluntary basis for all CEPT countries and participation was later mandated for EU Member States via an EC Decision.

As one respondent specifically raised this issue, we would be interested in collecting further opinions on this subject and therefore we would kindly ask you to respond to two additional questions which are supplementary to your original response. Your response is kindly requested by Friday 01 April 2016.

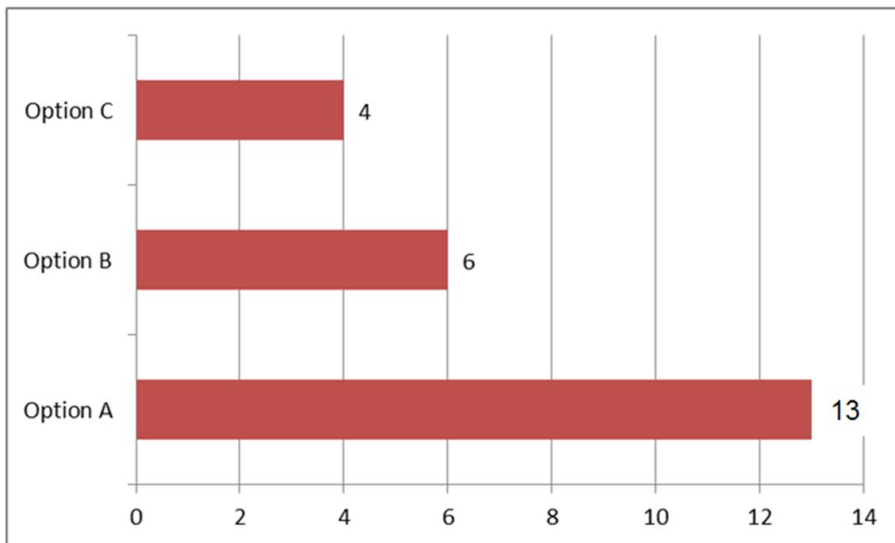
3.2 RESPONDING ORGANISATIONS

Organisation	Type	Country
Federal Ministry of Defence, Austria	Ministry	Austria
Ministry of the Interior	Ministry	Austria
Federal Public Service Interior	Ministry	Belgium
Communications Regulation Commission (CRC)	Admin	Bulgaria
Croatian post and electronic communications agency	PSAP	Croatia
Czech Telecommunication Office	Admin	Czech Republic
FICORA	Admin	Finland
Federal Network Agency, on behalf of Experten Gruppe Notruf (EGN)	PSAP	Germany
National Media and Infocommunications Authority Hungary	Admin	Hungary
Post and Telecom Administration of Iceland	Admin	Iceland
ComReg (Commission for Communications Regulation)	Admin	Ireland
Emergency Response Centre	PSAP	Lithuania
Communications Regulatory Authority of the Republic of Lithuania	Admin	Lithuania

Telecommunications Permanent Representation of Malta to the EU	Ministry	Malta
Netherlands Police	PSAP	Netherlands
Police Shared Services	PSAP	Norway
ANCOM	Admin	Romania
Agency for Communication Networks and Services of the Republic of Slovenia	Admin	Slovenia
CENTRO COORDINADOR DE EMERGENCIAS 112 - LA RIOJA	PSAP	Spain
1-1-2 de Castilla y Leon	PSAP	Spain
Generalitat Valenciana	PSAP	Spain
SOS Alarm Sverige AB	PSAP	Sweden
Federal Office of Communications (OFCOM)	Admin	Switzerland

3.3 QUESTION 1

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.



EGN (D)	A
ERC (LTU)	A
LA RIOJA (E)	A
CRC (BUL)	A
CTO (CZE)	C
Ministry of Interior (BEL)	A
HAKOM (HRV)	B
SOS Alarm (S)	C
Federal Ministry of Defence (AUT)	A
RRT (LTU)	B
Castilla y Leon (E)	A
Police Shared Services (NOR)	B
FICORA (FIN)	B
BAKOM (SUI)	C
ANCOM (ROU)	A
Valenciana (E)	A
PT (ISL)	B
AKOS (SVN)	A
NNMH (HNG)	A
Ministry of the interior (AUT)	B
ComReg (IRL)	A
EU PERM REP (MLT)	C
Netherlands Police	A

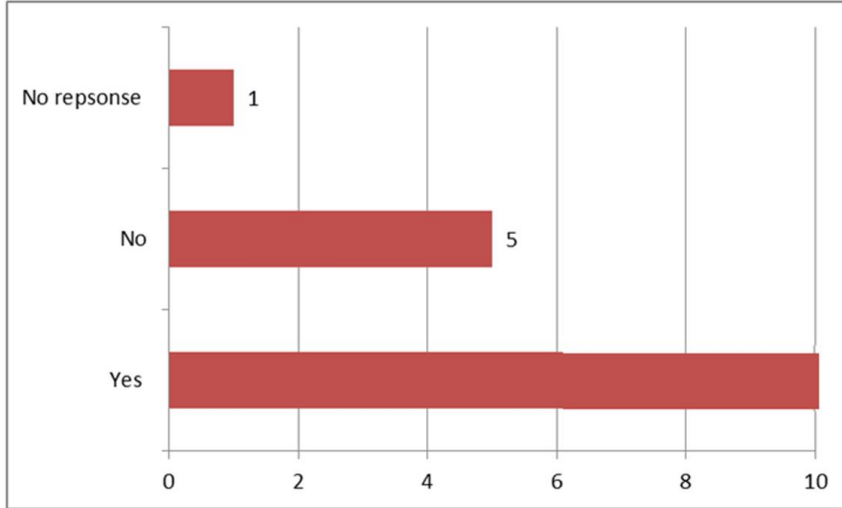
Option A: My organisation would prefer that the database solution to facilitate inter-PSAP communications, and participation in that database by EU Member States, be mandated by EU legislation, so that inter-PSAP communications is possible between PSAPs in all EU member states. (13 respondents from 11 countries including ERC LTU)

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. (6 respondents from 6 countries including RRT LTU)

Option C: My organisation has no preference. (4 respondents from 4 countries)

3.4 QUESTION 2

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?



- No response: SVN
- No: 5 responses from 2 countries
- Yes: 10 responses from 10 countries including SOS Alarm and BAKOM, who answered "Option C" to Q.1

EGN (D)	No
ERC (LTU)	Yes
LA RIOJA (E)	No
CRC (BUL)	Yes
CTO (CZE)	n/a
Ministry of Interior (BEL)	Yes
HAKOM (HRV)	n/a
SOS Alarm (S)	Yes
Federal Ministry of Defence (AUT)	Yes
RRT (LTU)	n/a
Castilla y Leon (E)	No
Police Shared Services (NOR)	n/a
FICORA (FIN)	n/a
BAKOM (SUI)	Yes
ANCOM (ROU)	Yes
Valenciana (E)	No
PT (ISL)	n/a
AKOS (SVN)	
NNMH (HNG)	Yes
Ministry of the Interior (AUT)	n/a
ComReg (IRL)	Yes
EU PERM REP (MLT)	n/a
Netherlands Police	Yes