*Question 1:*

*1.1 Is Ofcom correct in focusing its attention on ECLI for mobile emergency calls (as opposed, for example, to fixed-line or VoIP calls) at this time?*

*EENA Response: EENA agrees with this approach. The overwhelming majority (approximately two-thirds) of all emergency calls originate from mobile networks. In general, the fixed line originating calls are presented with the civic/geodetic address and so there are normally no issues here.*

*However, one area within the fixed line originating calls that does need to be looked at are those which originate from campus/business networks i.e. from companies with many offices/premises, universities. In this circumstance, only the number and address of the "Head Office" is provided and not the local branch number. Call-backs are not allowed because the callers' number is not provided. It is estimated that c14% of emergency calls originate from these campus/business networks EENA would also encourage Ofcom to consider this in its workstream.*

*Nevertheless, Ofcom should focus its attention also to VoIP calls in the near future. Currently the number of VoIP is increasing in Europe. The present situation of inaccuracy of ECLI should not be repeated for VoIP CLI.*

*1.2 Are there, in your view, any concerns associated with the current provision of mobile ECLI in terms of a) accuracy and b) reliability? If so, what are these concerns?*

*EENA Response: In general, the current provision of mobile ECLI allows for just cell-id with some timing advance information. As a result the variables are too wide leaving the emergency service without an accurate address. This increases the address verification process time and results in a longer intervention time. The consequences of such incomplete information could be fatal for the caller.*

*Establishing the exact place of the call helps emergency services to decide upon the resources needed to provide assistance. This is the main reason why location should be as accurate as possible. Information about how to access the location of the emergency can reduce radically the time of the intervention. Medical research indicates that one minute reduction in response time improves the odds of survival by 24%[1].*

*In addition, the reliability of the information is not always accurate and therefore the location information should be continually capable of sending updates if necessary.*

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[1] See Colin O'Keeffe, Jon Nicholl, Janette Turner, Steve Goodacre, "Role of ambulance response times in the survival of patients with out-of-hospital cardiac arrest" *Emerg Med J* doi:10.1136/emj.2009.086363 (available at emj.bmj.com/content/early/2010/08/25/emj.2009.086363.abstract)

*Question 2:*
*Do you agree that network-based approaches could offer solution to tackle the potential issues regarding reliability and accuracy of mobile ECLI?*

*EENA Response: EENA does not believe that network-based solutions offer the solution on their own and rather that it be used in combination with handset-based ECLI.*

*Question 3:*
*To what extent would the provision of such solutions be reliant on the deployment of LTE networks and what would be the likely timescales for implementing such solutions?*

*EENA Response: EENA does not believe that the provision of solutions has a direct dependency on the availability of LTE networks. Meaningful and accurate ECLI is available currently in countries where LTE has not yet been rolled out. EENA believes that the accuracy and reliability targets should be technology-neutral and therefore the obligated parties should be given a specific target to meet along with the obligation to independently prove that they are being met.*

*Question 4:*
*Could these solutions offer the same benefits to Limited Service State ('LSS') callers and internationally registered callers as for domestic end-users using their 'home' network?*

*EENA Response: The principle of 112 is that it is a pan-European emergency number and there should work seamlessly between countries. Roamers should be afforded the same service as "native" callers as a result. "Off net" callers should also be afforded the same quality of service as "on net" callers particularly where their own network is unable to carry their emergency call.*

*Therefore any solutions should bear this provision in mind.*

*Question 5:*
*5.1 Do you think that handset based approaches (e.g. Apps) could offer a cost-effective and dependable means to tackle potential problems linked to accuracy and/or reliability in mobile location information? If so, what are the likely costs to all parties involved in the end to end support of handset-based approaches?*

*EENA Response: Third-party solutions, such as Apps, are not a sustainable solution to the issue of ECLI although their presence can add value to the location information availability and accuracy. Currently, Apps are being developed as a substitute for the inaction by the competent regulatory authorities in setting accuracy targets. Because of the lack of standardisation, some Apps will only work in their "home" country and therefore are not compatible with the intention of a pan-EU emergency number.*

*Handset-based solutions however are the solution as a hybrid with network-based solutions (see Question 2 response).*

*EENA would also refer Ofcom to the existing legislation regarding eCall and location accuracy and urge it replicate the same accuracy requirements for 999/112 emergency calls that exists for eCalls.*

*5.2 Do you see solutions such as Apps as a long-term alternative to network-based approaches?*

*EENA Response: No, they will be seen more as a support rather than a replacement or alternative, for the reasons stated above.*

*Question 6:*
*What are the changes that EAs would suggest in order to address potential issues regarding accuracy and reliability of mobile ECLI?*

*EENA Response: It is well known that the two issues that are pertinent are the accuracy of the location information and the elapsed time in receiving the information and whatever updated information is available.*

*To that end, the EAs would require the information to be available at the time the call is presented to them as well as the confirmation that the information has been "sense checked" by the presenting network. Location information that has not been verified for whatever reason should be identified and flagged accordingly.*

*Question 7:*
*What would be the potential costs implications for EAs if such changes were to be implemented?*

*EENA Response: It depends on the current technologies being deployed and the method chosen to pass the caller location information to the EA. However, any investment would be incremental and should be supported by the Member State and viewed as a long-term investment in the safety and security of its citizens.*

*Question 8: Are there ways in which tackling potential issues regarding the accuracy and/or reliability of mobile call ECLI could adversely affect consumers, and could these be mitigated?*

*EENA Response: Some consumer could be concerned about data privacy. However, as legislated for already, the caller relinquishes his/her right regarding the data privacy once an emergency call is made. Location information is only presented to the emergency service for the purposes of handling an emergency call and administering the assistance that is needed.*

*Question 9:*
*If Ofcom was to consider setting further criteria for the accuracy and reliability of ECLI, should these be independent of the technology used by a CP?*

*EENA Response: It is EENA's belief that the criteria for accuracy and reliability should be carrier neutral. By this we mean that the targets should be set and it should be up to the carrier to achieve this target based on whatever technology and infrastructure that they use or plan to use. Most carriers wish to receive "regulatory certainty" and by setting targets, they are free to implement whatever technical solution they choose.*

*However, what is crucial is that there be a monitoring programme put in place by Ofcom to ensure that the carriers are meeting their obligations.*

*Finally, it is suggested that Ofcom could set a "glide path" of increased accuracy and reliability over time by setting stricter targets in the coming years.*