

Question 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?:

NHS England is of the opinion that Ofcom is correct in focusing its attention on ECLI for mobile emergency calls.

Question 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?:

NHS England is concerned that the current mobile ECLI provided to emergency services is not adequate. In some rural areas the accuracy of the caller's location can be no better than within a 1 mile radius.

In dense urban area such as London the location can be pinpointed to within a radius of 200 meters. However, if the particular emergency service is on the other side of a canal, river or rail tracks without a nearby bridge this can increase the time it takes for the emergency service to respond. As a result, the first question asked of a mobile phone caller by emergency dispatch is 'what is your location' rather than 'is the patient breathing' as it is for a landline caller (where the address is prepopulated on the screen using BT's database). This can lead to an approximate 30-40 second delay in some cases, and longer in others: critical if a patient is in a life threatening condition.

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

NHS England is in favour of any reasonable technology that will improve the accuracy and timeliness of ECLI.

Question3: 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?:

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?:

Question 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?:

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

NHS England would support any reasonable measure to improve the accuracy and timeliness of the location information available from an emergency mobile phone call, and imagine that smartphone technology (“apps”) will assist in this (since smartphones are currently able to pinpoint their location with a high degree of accuracy).

Regulatory changes should support a mechanism whereby when an emergency call is made the exact location of the mobile phone is made immediately available to the receiving emergency service.

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

NHS England supports accurate and timely ECLI communication for mobile callers that is equivalent to the current system for landline callers.

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

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?:

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?: