



ETNO and GSMA response to the consultation on the Commission's Delegated Regulation amending Regulation (EU) 2015/758 of the European Parliament and of the Council as regards the standards relating to eCall

22 November 2023

ETNO and GSMA represent the telecoms sector in Europe and worldwide. Our members are the companies responsible for deploying next generation connectivity, with the aim of meeting the European Commission's digital decade connectivity targets, and in parallel, making important progress on the twin green-digital transformation.

As operators of mobile networks, which carry eCall communications, we have long engaged with the European Commission, national governments, and regulators to discuss the future of eCall, knowing that the phasing-out of 2G/3G networks is already done in many parts of the world and well underway in Europe. We therefore welcome the Commission's consultation on the draft Delegated Regulation.

We would like to emphasize that the subsequent early adoption and entry into force of the Delegated Acts impacting both car manufacturers and PSAPs is of great importance for many reasons, resource efficiency, innovation transformation and in relation to spectrum. Indeed, spectrum currently used in legacy networks is refarmed for 4G/5G mobile networks, meeting increasing demand for high-speed connectivity and IoT solutions.

Draft Delegated Regulation amending Regulation (EU) 2015/758

We support the proposed approach where new vehicles, placed on the market after 1st January 2027 will be considered in conformity with the regulation where they comply with the technical specifications for packet-switched eCall.

In this regard, we also express our strong support for the voluntary option for early adopters to be considered in compliance with the regulation should they decide to place new vehicles on the market supporting eCall in packet-switched networks after 1st January 2025.

Immediate use of new standards

The utmost priority of the forthcoming Delegated Act is for the standards and technical specifications cited therein to be made applicable as soon as possible. This is a key objective of the act and should



therefore not be delayed by the additional requirement for standards to be transposed into national legislation before being able to be applied. We are therefore highly concerned about the proposal to defer the date of application of such standards in recital 7.

Rather, we encourage the Commission and the Council to ***enable the immediate application of the cited standards and technical specifications upon entry into force of the Delegated Act***, in the understanding that these standards have already been developed, approved and published for use in the EU internal market.

This is also critical for the voluntary adoption from certain manufactures as well (as mentioned in our point above) which demand such predictability and assurance at the earliest possible.

Long-term solution to eCall

ETNO and GSMA have engaged in thorough discussions with relevant stakeholders, including the European Commission, since several years now to raise our concerns on the current eCall solution. The priority for all the participants in the ecosystem is on ensuring that new vehicles will be supporting packet-switched eCall in 4G/5G networks as soon as possible. With the current proposals for Delegated Acts well underway, we anticipate this to be solved urgently.

Following the conclusion of this urgent task, which benefits everyone involved and the European citizens, a long-term solution for eCall should be anticipated and planned for in the Commission's future mandate from October 2024.

ETNO, the European Telecommunications Network Operators' Association, represents Europe's telecommunications network operators and is the principal policy group for European e-communications network operators. ETNO's primary purpose is to promote a positive policy environment allowing the EU telecommunications sector to deliver best quality services to consumers and businesses.

The GSMA is a global organisation unifying the mobile ecosystem to discover, develop and deliver innovation foundational to positive business environments and societal change. Our vision is to unlock the full power of connectivity so that people, industry, and society thrive. Representing mobile operators and organisations across the mobile ecosystem and adjacent industries, the GSMA delivers for its members across three broad pillars: Connectivity for Good, Industry Services and Solutions, and Outreach.