

ETNO Expert Contribution commenting on EGEA Committee “Operational Needs for Access to Emergency Services”

ETNO is pleased to present its comments on document “Operational Needs for Access to Emergency Services” EGEA07 -02 v1.3, issued following the 18 December 2007 Expert Group on Emergency Access (EGEA) meeting.

EGEA 07-02 - Part 1

ETNO has no specific comments on Part 1 but agrees that it's very useful to have a set of common and supplementary operational needs to guide standards development and provide clarity for those communication providers (network and service providers) connecting to PSAPs.

EGEA 07-02 - Part 2

Section 2: Terminology

We note that the definition of PATS may change in line with the 2007 EU e-Communications Regulatory Review and so this section should also show the proposed new set of definitions.

The list of Emergency Response Organisations (ERO) should include the Coastguard. In the UK for instance, the Coastguard is responsible for coastal rescue missions at sea or on cliffs. They have their own rescue boats and also dispatch lifeboat crews. The Coastguard services operate eighteen 24-hour ECCs and are the fourth emergency service in the country.

Section 4: Operational Needs for Interface 2

4.1 Common Operational needs

4.1.1.2 This should more accurately reflect Article 23 of the USD, i.e. ETNO proposes to reword as follows “**Network and Service Providers must take all reasonable steps to ensure uninterrupted access to the PSAP**”.

4.1.1.3 and 4.1.1.5 The resiliency of a PSAP/ECC as well as its contingency plan, in a liberalised telecommunication environment can only really be the

responsibility of the PSAP/ECC. A PSAP/ECC may choose a number of different network providers to provide its communication links, for example copper, fibre and microwave options may all exist and be provided by different network providers to a given PSAP. Similarly, a PSAP/ECC's contingency plan may involve diverting calls to a neighbouring PSAP/ECC, which it will select. Having said that, network and service providers need to assist with such plans to make sure that separation and diversity of links help avoid single points of failure within access networks (which may share ducts or switch/server buildings). ETNO would propose following wording to reflect this, which also attempts to clarify the difference between resiliency and contingency:

Revised 4.1.1.3 PSAP/ECC should take all reasonable steps (assisted by Network and Service providers) to provide sufficient resiliency to ensure 7-days a week, 24 hours a day availability of the communication links to the PSAP from the community it serves.

Revised 4.1.1.5 PSAPs (assisted by Network and Service Providers) need to provide a contingency plan. This will describe the set-up used by a PSAP/ECC to ensure continuity of service for the community it serves in the event of a major failure/event causing a PSAP to be unable to receive calls (for example evacuation of a PSAP)

4.1.4.1 The sentence about more precise location available through terminals should be changed for consistency with location derived from network/service information, and moved nearer to the end of this section after the sentence stating the section is a requirement of European Law (provision of terminal based location is not part of European Law). Proposed sentence is:-

If more precise location is available through the terminal equipment this information should also be provided to the PSAP, if technically feasible.

4.1.4.3 Second paragraph is proposed to become :

It must also be possible to reroute to (a) secondary PSAP(s) automatically (through normal network facilities), on manual initiation from the first PSAP, or by a request to the Network/Service Provider(s) (e.g. in case of an imminent emergency in the primary PSAP). This secondary PSAP may be located in a neighbouring country.

This reflects range of diversion facilities available in networks from service providers.

4.1.5 Mechanisms for prioritisation of emergency calls are not yet clearly available within IP based networks so we should modify this to :

Network and Service providers should ensure that emergency calls should be accorded priority over all other calls to the extent technically feasible.

4.1.7 This needs to be clarified, both from point of view of National Legislation and technical possibilities. Proposed new para is as follows:

Where National legislation explicitly requires this possibility, Network and Service providers shall provide the means for emergency operators at PSAPs/ECCs to interrupt ongoing non-emergency calls if technically feasible, for example to obtain neighbour's assistance to open doors, contact emergency personnel, translators etc.

4.1.8 The second paragraph needs slight clarification as follows:-

In order to prevent abuse and in accordance with national legislation, a PSAP/ECC may request Network and Service providers to stop conveying calls or messages from a particular source (based on CLI or telephone number) to a particular PSAP. In cases where such requests are legally made, Network and Service providers shall stop conveying calls to a particular PSAP from that source.

4.1.10 This section will need to be subject to future amendment as the Universal Service Directive review progresses and the work of INCOM and possibly the Total Conversation project is advanced. However for the moment, in keeping with the fact that 112 is a voice based service to which reasonable adjustments need to be made for those with hearing or speech impairments, and also the useful division into common and supplementary needs, this section should be amended as follows below. Services relying on video calling functions (such as signing or subtitles) should not be required in this section while international standards for interoperable terminals and public networks are yet to be widely agreed or implemented. For the present this could be a Supplementary Operational Need for countries where PSAPs may have special arrangements. A fax service also belongs in the supplementary needs section.

Network and Service providers should be able to deliver emergency calls coming from alphanumeric terminals transmitting real time text over the voice channel to PSAPs capable of processing them, or to an intermediary platform with text relay facilities as a means of facilitating access to all PSAPs for users with hearing or speech impairments.

Network and Service providers should work closely with standards bodies to ensure that services introduced into NGNs capable of multimedia calls support the emergency communication needs of those with disabilities, such as real time text, sign language, speech support, subtitled voice and related relay services.

4.1.11 This paragraph is not needed since this document sets out need for a common interface "2" to be used by all network/service providers and needs of interface "3", eCall and real time text are covered elsewhere.

4.2 Supplementary Operational Needs

4.2.1 Language support - This has to be the responsibility of the PSAP and its own private switch should have the required conferencing facilities.

4.2.3 Dealing with overflows – The wording needs to change as follows to reflect how this would be done in practice

Network and Service providers should ensure that, when certain network conditions (such as all links busy) are met from links to PSAPs, it is possible to change to which PSAP calls of a specific location and type (police, ambulance, fire, etc) are routed according to rules previously agreed with the normal PSAP. In case of overflow of the amount of calls for a specific PSAP, routing to alternative PSAPs must be possible. Security systems to guarantee unaltered routing information should be in place.

4.2.5 and 4.2.7 These are not the responsibility of network and service providers and it's not clear why these organisations are mentioned.

4.2.6 The location, session identifier and registration functions should all be qualified by "where technically feasible" as these are not necessarily available through methods based on international and interoperable standards.

EGEA 07-02 - Annexes

Annex 1: The references section needs updating with, for example, the latest IETF references.

Annex 2: The reform of the regulatory framework means this should at least include the proposed changes alongside existing regulation.