



Europe

Position Paper

GSMA Europe Position Paper on eCall

27 August 2009

GSMA Europe and mobile network operators recognise eCall as a valuable and logical step forward in the European Commission's efforts to reduce fatalities on European roads. By becoming a signatory to the eCall Memorandum of Understanding, we formally express our support and commitment to collaborate with other stakeholders in realising the eCall service. The following key points emphasise our position.

1. Successful roll-out demands stakeholder collaboration and commitment

Though we are fully committed to implementation, mobile network operators are just one of the many stakeholders whose involvement is crucial for the successful deployment of eCall. Collaboration amongst the automotive industry and Member States or organisations responsible for the running of PSAPs is paramount, and we would strongly recommend to these stakeholders to commit publicly to the development of harmonised implementation plans.

2. Third Party Services supporting eCall are purely commercial offers

Pan-European eCall will be based on the single European emergency number 112, supplemented with the capability of sending emergency-related data (Minimum Set of Data) to the PSAPs. We consider any variations beyond "plain vanilla" eCall to be commercial offers and thus out of the scope of the eCall Memorandum of Understanding.

3. A single harmonised solution is necessary for interoperability and availability of service

We support a single harmonised solution as standardised by ETSI MSG and 3GPP since it is necessary to ensure interoperability and maximum availability of the eCall service.

4. SIM issuance should be voluntary and subject to commercial agreements

In order to achieve a truly Pan-European eCall service, the presence of a SIM card in the in-vehicle equipment is required. The issuance of SIM cards by mobile network operators should be done on a strictly voluntary basis and subject to standard commercial agreements and negotiations.



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5. Protecting users' privacy is key

In order to protect users' privacy, the eCall in-vehicle system should remain in a dormant state until an eCall has been activated.

6. Mobile network operators retain the same level of liability for placing eCalls as for existing emergency calls

Mobile network operators have the responsibility to process incoming eCalls in the same manner as they process normal emergency calls. Responsibility for processing eCalls and routing them to the correct PSAP always lies with the network serving the vehicle at the time of activation.

Further details on these points are provided in the following section.

About the GSMA in Europe

The **GSMA** in Europe represents 171 operators in 50 countries/areas in Europe and counts around 600 million subscribers. Globally, the GSM Association represents over 800 operators in over 200 countries and counts around 3.8 billion subscribers (www.gsmeurope.org).



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1. Successful roll-out demands stakeholder collaboration and commitment

GSMA Europe and mobile network operators have, and will, continue to support the European Commission in its objective to roll-out Pan-European eCall, which we recognise as a valuable and logical step forward in reducing road fatalities. Over the years, we have substantially contributed to the development of eCall through our contribution to the eCall Driving Group and our participation in standardisation bodies, including ETSI MSG and 3GPP, in the definition of technical specifications. By becoming a signatory to the eCall Memorandum of Understanding, we formally express our support and commitment to collaborate with other stakeholders in realising implementation of the service.

While it can now be safely assumed that technical standards relating to mobile networks are either in place or sufficiently stable, substantial work remains to be done in order to ensure that implementation can effectively fulfil the objectives of the eCall initiative. Though we are fully committed to roll-out, mobile network operators are just one of the many stakeholders whose involvement is crucial for the successful deployment of eCall. It certainly makes no sense to carry out the necessary investments in mobile networks (such as implementing the eCall flag) unless PSAPs are ready to handle eCalls from appropriately equipped vehicles. Collaboration amongst the automotive industry and Member States or organisations responsible for the running of PSAPs is paramount, and we would strongly recommend to these stakeholders to commit publicly to the development of harmonised implementation plans. In this context, the European eCall Implementation Platform serves as the key focal point where relevant parties can exchange views and assist the Commission in defining the necessary preconditions for making eCall a success.

2. Third Party Services supporting eCall are purely commercial offers

According to our understanding, pan-European eCall will be based on the single European emergency number 112, supplemented with the capability of sending emergency-related data (Minimum Set of Data) to the PSAPs. As with 112, eCall will be offered free of charge to the user.

GSMA Europe and its members consider any variations beyond “plain vanilla” eCall to be purely commercial offers and thus out of the scope of the eCall Memorandum of Understanding. Third Party Services (TPS) Emergency Calls are and can be provided by interested stakeholders on a commercial basis by using the in-vehicle equipment and mobile operators’ networks. However, they should not be confused with eCall and should be technically and strictly differentiated from an eCall emergency call by, for example, being based on a number other than 112.

3. A single harmonised solution is necessary for interoperability and availability of service

We support a single harmonised solution as standardised by ETSI MSG and 3GPP since it is necessary to ensure interoperability and maximum availability of the eCall service¹.

¹ Orange France Telecom Group believes that the relevant standardisation work should continue to study any potential impacts on PSAPs.



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4. SIM issuance should be voluntary and subject to commercial agreements

In order to achieve a truly pan-European eCall service, the presence of a SIM card in the in-vehicle equipment is required (as already required today by emergency services in a number of Member States). However, it should be noted that the issuance of SIM cards by mobile network operators should be done on a purely voluntary basis and subject to commercial negotiations and agreements.

5. Protecting users' privacy is key

Owing to the Opinion of the Article 29 Working Party on data protection and privacy implications in the eCall initiative², we believe it is necessary to keep the in-vehicle system in a dormant state until an eCall has been initiated. This will ensure that eCall users can only be traced at the moment when an eCall is activated.

6. Mobile network operators retain the same level of liability for placing eCalls as for existing emergency calls

Mobile network operators have the responsibility to process incoming eCalls in the same manner as they process normal emergency calls save for the additional task of evaluating the eCall flag. The eCall flag indicates i) whether an emergency call is in fact an eCall and ii) whether the call was initiated manually or automatically, and can be used to route calls to the correct PSAP. We would like to emphasise that the responsibility for processing eCalls and routing them to the correct PSAP always lies with the network serving the vehicle at the time of activation, which may or may not, for example in roaming cases, be the home network of the user placing the eCall.

² http://ec.europa.eu/justice_home/fsj/privacy/docs/wpdocs/2006/wp125_en.pdf