



Europe

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Juhani Jaaskelainen
Head of Unit
Directorate-General Information Society and Media
European Commission
200 Rue de la Loi
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Brussels, 4 October 2010

Dear Mr Jaaskelainen,

Thank you for providing stakeholders with the opportunity to comment on the eCall initiative via the online consultation. On this occasion the GSMA has decided not to respond directly to the questionnaire as we believe it is geared more towards consumer respondents. Nevertheless we look forward to continuing our work with the European Commission and other stakeholders to help make eCall a reality.

The GSMA and its members remain fully engaged in the process of contributing to the achievement of a pan-European eCall service as evidenced through our signature of the eCall Memorandum of Understanding and our active participation in the European eCall Implementation Platform. We are also involved in eCall related discussions in ETSI MSG and 3GPP and, as you are aware, are in regular contact with your services to provide input and information.

We look forward to continuing this collaboration and would just take this opportunity to re-emphasise some points we have made previously with regards to the implementation of eCall:

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.



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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. 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.

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.

Please do not hesitate to get back to us if you have any questions or require further explanations on the points set out above. We look forward to continued collaboration with you and your team.

Yours sincerely,

A handwritten signature in black ink, appearing to be 'M Whitehead', written over a horizontal line.

Martin Whitehead
Director GSMA Europe