

National Policing Data Communications Group (DCG)

Additional comments:

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?:

Yes. Ownership and access to mobile devices capable of making emergency calls continues to increase. This growth has inevitably resulted in a rise of mobile device 999 / 112 emergency calls. Location is always the most important piece of information when trying to respond to emergency incidents. Due to added complexities we feel it is correct to address VoIP telephony separately, but in the near future. Fixed-line location remains generally accurate and reliable

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?:

Yes - Reliable and accurate location information is essential when responding to emergency situations. Any delay in arrival at critical incidents can result in the most serious of consequences. The general accuracy of location information solely reliant on cell site information is too vague to ensure a prompt response. If the caller is unable to provide their location emergency services are reliant on other information or calls from other members of the public.

999 / 112 calls from mobile devices roaming from abroad, and UK devices roaming (due to lack of network coverage) can result in inaccurate or missing location information. .

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

The solution will probably require a combination of approaches to develop a system that is both reliable and future proof. The rapid growth of technology and speed of change would probably be ineffective if undertaken in isolation. An effective and long term solution may benefit from the collaborative working of networks, device manufacturers and application service providers. To gain maximum benefit GPS data would form part of the location information solution.

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?:

The introduction of LTE networks offers both risk and opportunity to 999 / 112 location services. The refresh of networks could allow additional location functionality to be deployed, however is the ability to influence this already too late? The mixture of 2G / 3G / 4G technology invariably will result in a wide variance in purely network based 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?:

Further to my answer in Question 2 We feel any effective solution to this issue would involve a combination of companies.

The number of users now using 999 / 112 who are unable to provide accurate location information continues to increase. This may be as a result of being unfamiliar with their surroundings, being unable to speak English or unable to communicate through illness or injury. Accurate location information is key in providing assistance.

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?:

Many mobile devices will contain location information that could provide enhanced accuracy to emergency services. Many common Apps routinely collect GPS, Wi-Fi and network information to provide fast time location based services. If this information could be passed to the emergency services in tandem with the 999 / 112 text or voice call it would ensure the best data was available. The importance of any App based solution would be the maintenance of the product and compatibility with all operating systems. Any solution would inevitably require the involvement of global companies such as Apple, Samsung, Google and others

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

A combination of solutions would be the most effective method.

The DCG are currently supporting the BT 999 / 112 App trial to evaluate the accuracy and benefits.

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

The accurate visualization of any location information is vital to gain maximum benefit from any additional data. The emergency services in partnership with 999 / 112 CHA must ensure the creation and transmission of information is reliable and effective. Emergency services must ensure they make maximum use of existing technology to benefit from any enhanced information.

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

Any additional necessary expenditure on police front line technology should be offset by savings through efficiency and effectiveness. The ability to respond swiftly and successfully

to genuine 999 / 112 calls is key to maintaining public confidence and ensuring police are able to achieve its primary objective to protect life.

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?:

There is an expectation from consumers that emergency services should promptly respond to any 999 / 112 call. Any owner of a smartphone who can instantly see accurate location displayed on their device would struggle to understand why this information would not be used to assist them in time of need. When a user dials 999 the expectation of privacy is secondary to the emergency services to effectively responding. Any solution that is identified and deployed will have an associated cost and no doubt will at some stage filter through to the subscriber through higher mobile phone bills, increased hardware costs or taxes. Any consumer who has dialed 999 in a life at risk situation will know the importance of a swift response

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?:

Maximum benefit should always be derived by the technology used by communications providers. However we feel the combination of CP, device manufacturers, and application service provider solutions will provide the best solution both in terms of accuracy and future proofing. The key will be the ability to ensure these three entities work together. This may of course require additional national and international collaboration.