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cc: Home Office

Further letter to communication providers: the importance of complying with your obligations regarding emergency calls

On 31 October 2025, Ofcom opened a compliance programme to assess whether communications providers are meeting a number of their obligations concerning emergency calls. We also published an open letter to remind providers of those obligations.[1]

As explained in that letter, providers are required to take all necessary measures to ensure uninterrupted access to emergency organisations as part of any voice communications services they offer.[2] They must also ensure that accurate and reliable information about the caller's location is provided for all calls to emergency numbers, to the extent it is technically feasible.[3] It is of vital importance that consumers across the UK can contact emergency services whenever they may need to and that any call is accompanied by accurate location information.

Last year, we concluded two enforcement investigations into failures affecting access to emergency services. [4] These cases highlighted the importance of providers having appropriate measures in place to meet their obligations. We therefore opened this compliance programme - and analysed information from a range of providers - to assess whether providers across the sector have such measures in place. The observations we have made in this compliance programme will be considered, alongside all other relevant factors, when assessing what measures providers have taken to comply with their regulatory obligations.

This letter sets out our findings and highlights a number of measures that support compliance with providers' obligations, and which we consider will ensure the continued resilience of networks providing access to 999 and 112 services. Our expectation is that providers should take steps to ensure these measures are in place where it is appropriate and proportionate to do so. These expectations apply, whether as individual measures or as a combination of measures, as part of complying with their regulatory obligations to take all necessary measures to ensure uninterrupted access to emergency organisations and to provide accurate and reliable caller location information.

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[1] Ofcom, Open letter to telecoms providers: the importance of complying with your obligations regarding emergency calls
[2] GC A3.2(b) Ofcom, General Conditions
[3] GC A3.5 and A3.6
[4] Ofcom, Investigation into Gigaclear Limited's compliance with General Conditions A3.5 and A3.6(a); and Investigation into Vonage's compliance with emergency calls access rules.

Findings

We have not identified specific issues that warrant a targeted investigation using our formal enforcement powers at this time. While this is a positive indicator, it remains essential that providers continue to prioritise compliance with their obligations given the critical role that communications networks and services play in facilitating access to the emergency services.

Providers' responses described a range of approaches to managing emergency calls, reflecting differences in network design and operational practices. Based on our review, we have identified a number of measures that providers should look to take to support the ongoing resilience of 999 services. These are set out below.

Measures to support compliance and resilience

1. Monitoring and escalation of emergency call issues

We have found that providers take different approaches to monitoring emergency calls and escalating complaints related to them. Through previous investigations we know some resilience incidents impact only emergency calls,[5] and may not be picked up by wider monitoring. It is therefore important that emergency calls are effectively monitored to ensure that providers can act swiftly when issues arise to prevent interruptions to services.

As such, we would expect providers to have specific monitoring in place to identify issues affecting emergency calls, including having in place continuous, real-time monitoring or alert systems that can identify outages impacting emergency calls, rather than relying on general network alarms.

Complaints can also be a crucial channel for identifying potential problems impacting emergency calls, and appropriate complaint-handling processes can reduce the impact of incidents.[6] As such, where feasible all providers should ensure they have clear policies and procedures in place for the prioritisation and escalation of customer complaints that relate to emergency calls.

2. Use of test calls to verify emergency calling connectivity

Our analysis found that, while all network providers conduct some form of test call to establish whether emergency calls are working as expected, not all providers make regular end-to-end test calls.[7]

Test calls are quick and easy method to reassure providers that emergency calls are being connected and that accurate location information is provided. While certain test call simulations can confirm that a network is able to initiate emergency calls, end-to-end test calls provide additional assurance by verifying that calls are correctly routed to BT's Call Handling Centre and that accurate caller location information is provided.

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[5] Ofcom, Investigation into Gigaclear Limited's compliance with General Conditions A3.5 and A3.6(a); and Investigation into Vonage's compliance with emergency calls access rules.

[6] Our two previous investigations demonstrated that opportunities were missed to identify the respective incidents due to not utilising the information acquired from complaint handling data. Ofcom, Investigation into Gigaclear Limited's compliance with General Conditions A3.5 and A3.6(a); and Investigation into Vonage's compliance with emergency calls access rules.

[7] There are different ways to conduct emergency test calls, for example providers can carry out an end-to-end test call by dialing 999 or 112 to BT's Call Handling Agent, or call simulations that check a network's ability to make test calls without connecting to the CHA. Both can identify whether an emergency call can be made, but only end-to-end testing ensures that the call can connect to the CHA and check the call quality and the accuracy of the location information at the same time.

We have seen in recent investigations that disruption to services could have been reduced if regular end-to-end test calls had been made.[8]

As such, we would expect to see providers conducting end-to-end test calls to proactively test the resilience of emergency calls on the network. As part of test call arrangements, we would expect all providers to:

- conduct end-to-end test calls in a manner that is proportionate to the scale of the network – whether those are scheduled routine test calls and/or specific test calls as part of network changes; and
- schedule test calls with the BT 999 Call Handing Centre to ensure there is no impact on the live 999 service.[9]

3. Assessment and testing of network changes with potential impact on emergency calls

We found that providers take a range of approaches to managing the impact of network changes on emergency calls. Some providers carry out testing of emergency calling functionality as part of their change management processes, while others place greater reliance on post-implementation testing where it has been identified that a change may affect emergency calls.

Where providers rely on assessments of likely impact to determine whether testing is required, the quality and robustness of those assessments is critical. A failure to identify the potential impact of a network change can result in appropriate testing not being carried out.

In our recent investigation into Vonage, shortcomings in the provider's internal assessment processes meant that a change with the potential to affect emergency calls was not identified as such, and post-implementation testing was therefore not conducted. This contributed to the failure of its emergency calling service.[10]

Therefore, we would expect providers to:

- work from a default assumption that any significant network change may impact emergency calls unless there is a credible basis for concluding otherwise;
- conduct all necessary testing where network changes may impact emergency calls; and
- where providers rely on post-implementation testing, we would expect there to be robust procedures and processes in place, with appropriate oversight and checks, to minimise the risk of errors in assessing whether a network change could affect emergency calling services.

4. Accuracy of location information

Location information helps emergency services locate the caller and GC A3.6 sets out a number of requirements to follow in order to ensure accurate and reliable information. Based on our analysis, we consider there are three ways in which providers could improve how they provide location information:

Provider assurance of location information accuracy

To demonstrate compliance with the obligation to provide accurate caller location information to the extent technically feasible, providers need to have appropriate assurance over the accuracy and

[8] Ofcom, Investigation into Gigaclear Limited's compliance with General Conditions A3.5 and A3.6(a); and Investigation into Vonage's compliance with emergency calls access rules.
[9] See Telecoms industry guidance, 999 Test Call Handling Procedures
[10] Ofcom investigation into Vonage's compliance with emergency calls access rules

reliability of the location information associated with emergency calls made from their network or service.

Providers generally appear to rely on reports provided by BT's CHA to identify errors in location information. Many providers do not collect their own data about location information errors.

Whilst BT's reports are helpful, providers should be aware that not all the errors associated with location information will be identified and fed back to BT and so may not be included in the reports.

Therefore, to reduce the potential for errors, providers should compile their own data to identify and analyse any issues with location information.

Use and management of proxy location data

We believe that some providers are using proxy location data. This is a substitute number or code that providers use when the original location data is corrupted in some way.[11]

The use of this proxy data ensures that the emergency call can be put through to the emergency Call Handling Centre. However, it also means that the location information provided on these calls is not always correct, which could impact the response from the emergency services.

There may be circumstances where providers need to use proxy data. However, given the potential risks to callers, we would encourage providers to identify and analyse where proxy data is used and take proactive steps to minimise its usage.

Also, we would encourage providers to make BT aware of any standard proxy data that they regularly use. This would help emergency services identify if and when location information provided is possibly incorrect.

Sustained accuracy of address information

Finally, we noted that there was some variability in the frequency of how often address information is updated for the Emergency Services Database ("ESDB") and that providers audit this information at different frequencies. The ESDB is a central system used to pass caller location information from landline telecoms networks to emergency services. If this information is not updated regularly, it increases the likelihood that an out-of-date address may be used in an emergency.

We recognise that the volume and frequency of updates will vary by the size of each organisation. However, we would encourage all providers to update the ESDB in a matter of days or weeks of an address being added or changed. To ensure address information remains accurate over time, we would also expect providers to carry out audits of ESDB data at least annually, or more frequently where appropriate.

Next Steps

In this letter we have set out a range of measures that providers should look to take to support compliance with regulatory obligations and the continued resilience of emergency calling services.

In addition, Ofcom is planning to:

- begin monitoring the volume of test calls made to BT's CHA; and
- gather and review additional information from BT's CHA regarding the accuracy of providers' location information.

[11] Mobile Network Operators (MNOs) may use a dummy zone code, and fixed operators may use a default network number in these circumstances. See paragraph 6.3 of Ofcom's guidance - CLI Guidance: Guidance on the provision of Calling Line Identification facilities and other related services

We continue to keep under review our Resilience Guidance, as it relates to emergency calls, to determine whether further clarity is necessary regarding our expectations on providers. [12]

Additionally, we encourage all providers to proactively take note of any Ofcom publications relating to the protection of emergency calling services, as well as signing up for regular Ofcom updates. [13]

While it remains for individual providers to determine the measures that are appropriate and proportionate to take to protect access to these services, providers are reminded of their obligation in GC A3.2(b) to take all necessary measures.

Ofcom will draw on the observations from this compliance programme as part of its ongoing assessment of how providers are meeting their obligations in relation to emergency calling, taking into account the specifics of each provider's arrangements. We will also discuss the measures above as part of our regular engagement meetings and ongoing supervision of CPs.

Given the importance of these critical services, we remain prepared to use our formal enforcement powers to investigate where we identify concerns with provider compliance.

Finally, we would like to thank the providers involved in this programme for their positive engagement and the measures they already take in the interests of safe and reliable access to emergency services.

Yours faithfully

George Lusty

[12] Statement: Network and Service Resilience Guidance
[13] Ofcom Email Updates: Subscribe to email updates