GSMA Comments on the ECC Draft recommendation (17) 04

"Numbering for eCall"

Brussels, 23 August 2017

General Comments

The GSMA welcomes the ECC recommendation «Numbering for eCall» and the opportunity that it provides to contribute to this important aspect of eCall. On the subject matter of numbering, the GSMA has adopted a number of high-level principles, which are relevant in the context of eCall.

Notably:

Ensuring flexibility of numbering resources for eCall
It is important that regulators and numbering administrators maintain a flexible approach towards numbering resources to be used for eCall and refrain from assigning dedicated numbering resources specifically for this service.

Maintaining a neutral approach towards the various numbering resources
Choosing to use national or global (supra-national) numbers is ultimately a choice that service providers will undertake based on a number of factors such as scale, footprint and type of service, such as for eCall. It is important that regulators and numbering administrators maintain a neutral approach towards the various numbering approaches without unduly favouring one over another.

Implementing an EU-wide harmonised approach
To promote a smooth and efficient eCall implementation it is important that all national numbering administrators adopt the same numbering approach and rules across Europe to ensure maximum harmonization and transparency of the entire process.

Using national numbers outside national borders (Extra-territorial use) for IoT services and eCall
The use of national numbers on a permanent extra-territorial basis is particularly relevant to IoT services and eCall as such. The GSMA welcomes CEPT's approach in explicitly permitting the use of extra-territorial numbering resources also for eCall. This is fully in line with the draft provision at Art. 87(4) of the Electronic communication code that allows the use of non-geographical numbering resources for electronic communication services other than interpersonal communication services.

Maintaining a neutral approach towards provisioning models for eCall
Over-the-air (OTA) provisioning enables IoT service providers to select the connectivity provider at a later stage in the product lifecycle, i.e. when the service reaches the customer. It was developed specifically for those IoT use cases where it can be challenging to provision connectivity from the outset, or when deployed devices have a long lifetime and/or are deployed in locations where physical SIM replacement is not practical.

While it is important that CEPT recognizes the role that OTA provisioning can play in deploying eCall, it is crucial that numbering administrators maintain a flexible approach towards the various provisioning models for eCall. Once again, the ultimate choice will depend on a number of factors, such as scale, end-users' needs, availability of additional services, type of service (basic vs. third party eCall). The GSMA believes that all parties should have the flexibility to select a model that best suits their needs and no specific provisioning model should be promoted or imposed by regulatory action.

Furthermore, GSMA considers that the recommendation should state that the role of mobile operators in the management and use of numbering resources remains central and that the functional and operational elements of the SIM/eUICC strictly lie within mobile networks under the responsibility of the operator who provides the mobile service, including the management of the numbering resource usage.

Life cycle management and use of numbering resources

GSMA has actively participated in the work of the eCall Life Cycle Management Task Force under the European Commission's European eCall Implementation Platform (EeIP) and supports those recovery mechanisms that are least complex and more efficient to manage. Two solutions are especially attractive; either defining a set duration for the eCall SIM from the outset, or renewing the duration for a set time at regular vehicle testing. These are detailed as option 1 and 2 in the Life Cycle management report (see extract in appendix ii).

Proposals related to the ECC Deliverable

Comment number	Section number/ Clause	Type of comment (General/ Technical/Editorial)	COMMENTS	Proposed change
GSMA/1	Recitals (k) and (l)	General	The terminology in the recitals on extra-territorial use and roaming should be aligned with that used in Recommendation 5. The term used in Recommendation 5 is "extra-territorial use or roaming". The word "temporary" before "roaming" was deleted from Recommendation 5 in an earlier draft of the document (WG NaN Document No. NaN(2017-05)010_rev1 refers: https://cept.org/ecc/groups/ecc/wg-nan/client/meeting-documents/file-history/?fid=36587). This change will also avoid confusion that extra-territorial use of national numbers in a permanent roaming mode might otherwise be excluded.	Remove "temporary" (from "extra-territorial use or temporary roaming")
GSMA/2	Recommendation 2	General	In accordance with the principle set out above on OTA the GSMA believes the implementation of OTA should be considered together with alternative provisioning models, but not necessarily promoted or encouraged by numbering administrators. It should be left to it to industry to identify the more efficient and cost effective approach for eCall. The functional and operational elements of the SIM/ eUICC that strictly lie within mobile networks should remain under the responsibility of the operator who provides the mobile service, and this includes numbering resources.	Remove "implement" replace with "consider eUICC and alternative provisioning models"
GSMA/3	Recommendation 4	General	GSMA welcomes CEPT's positioning on permitting national authorities to allow the extra-territorial use of their respective national numbering resources for eCall. Allowing the extraterritorial use of numbering resources for M2M/IoT purposes is already foreseen in the Commission's proposed draft European Electronic Communications Code (Code) currently being debated, and would also entail allowing permanent roaming for M2M-based services. This practice should equally be allowed for eCall.	

GSMA/4	Recommendation 7	General	It is important to maintain a flexible approach towards numbering resources to be used for eCall and refrain from assigning dedicated numbering resources specifically for this service as it does not need dedicated numbering ranges, neither national nor supra-national.	Replace "Encourage" with "Permit" Add "allow for the use of other existing ranges" Remove "dedicated eCall"
GSMA/5	Recommendation 8	General	In accordance with the principle set out above, it is important to maintain a neutral approach towards the various numbering solutions	Remove the entire recommendation 8
GSMA/6	Recommendation 9	General	Recommendation 9 refers explicitly to E.164 numbers, the requirement to recover resources also applies to E.212 numbers. In accordance with the principle set out above. It is important to recover and recycle numbers in the most effective and efficient possible way. Either defining a set duration for the eCall SIM from the outset or renewing the duration for a set time at regular vehicle testing	Add "as well as E.212 numbers" Add "number recovery mechanisms should be cost effective, simple and implemented in a timely manner"

APPENDIX I –SUGGESTED AMENDMENTS

ECC draft recommendations as per draft ECC/REC (17)04 are reported with suggested amendments below for convenience (additions in **bold** deletions in bold and ~~strikethrough)~~

CEPT administrations, when considering E.164 and/or E.212 numbering resources for eCall, should:

1.   *Liaise with national stakeholders to facilitate the smooth introduction of eCall;*

2.   *In cooperation with relevant mobile network operators and service providers, encourage their national OEMs to ~~implement~~ **consider** eUICC and over-the-air **as well as alternative provisioning models** and technologies for eCall;*

3.   *Make available national numbering resources for eCall;*

4.   *Permit the extra-territorial use of their respective national numbering resources for eCall;*

5.   *Permit the use of global numbering resources (assigned by ITU TSB) or national numbering resources from another country (extra-territorial use or roaming) within the national territory for addressing eCall devices and encourage operators to provision these numbering resources in their networks to facilitate call-back from the PSAP to the vehicle Europe-wide;*

6.   *Where E.164 numbering resources for global services (assigned by ITU TSB) are used, assignees should be aware that they are responsible for ensuring that the numbers are diallable Europe-wide;*

7.   *~~Encourage~~ **Permit** the use of existing E.164 national M2M numbering ranges, **allow for the use of other existing ranges** or introduce ~~new~~ **new** ~~dedicated eCall~~ numbering ranges where there is a risk of exhaustion in national mobile numbering ranges;*

8.   *~~in cooperation with relevant mobile network operators and service providers, encourage the vehicle importing companies to work together with national service providers to assign national numbering resources for imported vehicles for eCall by using over-the-air provisioning where possible;~~*

9.   *Ensure that E.164 numbers **as well as E.212 resources** are recovered and recycled after a vehicle reaches end-of-life. **Number Recovery mechanisms should be cost-effective, simple and implemented in a timely manner***

APPENDIX II- eCall LIFE CYCLE MANAGEMENT REPORT

Abstract from chapter 3

Proposed end-of-life trigger options

Option 1: Define a set duration: The eCall SIM subscription is made active for a set number of years after which it automatically expires, unless it is re-activated before the end of its life, for another set period of time. The advantage of this solution is that it is relatively simple to implement. Once the eCall SIM life time is defined, there is no need for any interventions or change during the vehicle lifetime, either on the network or on the vehicle authorities' side. However, if the vehicle is scrapped or sold outside the EU before the expiration date, then the eCall SIM would still be provisioned up until the pre-set expiry date. If a vehicle is still in use after the expiration of the SIM subscription, an eCall should still be possible but without the possibility of call-back (as there will be no network registration and no calling line identity). The disadvantage is that it would make the eCall full service dependent on a "re-activating action" after the established period of time and leave out of the scope all vehicles which do not take that action. According to eCall type approval Regulation [Regulation (EU) 2015/758] the public 112-based eCall service has to be guaranteed throughout the lifetime of the vehicle. Therefore, it is necessary to analyse the legal implications of this option in order to verify whether it complies with that requirement of lifetime durability or a legal derogation is needed[1].

In some Member States the average life of vehicles is significantly high[2], therefore it is recommended to select an appropriate starting duration.

Option 2: Renew duration at regular vehicle testing: The Vehicle Type Approval legislation on eCall (2015/758) states that "uniform testing regime should be developed to ensure the longevity and durability of the 112-based eCall in-vehicle system," and this may form part of periodic vehicle tests. If the mandatory vehicle road worthiness tests dictated by Member States' Ministry of Transports include an eCall test call using a live network, the eCall SIM would register on the network, thus indicating that it (and the vehicle) is still in use. If an eCall or test call, a hence network registration, is not made for a pre-defined period of time, the car can be considered to be no longer in use. The advantage of this solution is that it allows for more frequent checks than the approach above, and reduces unnecessary use of network resources beyond the life of the vehicle. However, it does require definition of a process and mechanism for periodic eCall tests (this is being studied in the EeIP Periodic Technical Inspection task force) and it would leave out of the scope vehicles circulating without valid PTI, despite regular vehicle checks being mandatory in all Member States.

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[1] Regulation (EU) 2015/758, recital 13: "(…) In order to ensure continuity of the public 112-based eCall service in all Member States throughout the lifetime of the vehicle and to guarantee that the public 112-based eCall service is always automatically available, all vehicles should be equipped with the public 112-based eCall service, regardless of whether or not a vehicle owner opts for a TPS eCall service".

[2] In Spain the average age of vehicles involved in mortal accidents is 13,6 years old and private cars between 7 and 15 years old represent 47% of the total fleet, while private cars over 15 years old represent 27%.