



EUROPEAN UNION OF THE DEAF

A European Non-Governmental Organisation in official liaison with
European Parliament, European Commission and the Council of Europe

EUD report on the European Electronic Communications Code Summarised version

In 2018, the European Commission adopted the European Electronic Communications Code (EECC), establishing legal obligations for electronic communications networks and services across Member States. While the EECC ensures access to telecom services for all consumers, it lacks specific provisions addressing the needs of deaf people, particularly regarding access to voice communications and services in national sign languages. Although the EECC references relay services as part of universal service access, it fails to grant actionable rights to deaf people.

As the only supranational organisation representing all deaf people before the European Union through a network of National Associations of the Deaf from 31 countries, the European Union of the Deaf (EUD) has produced this report assessing the EECC's impact on approximately 1 million deaf people in the EU and the EEA. The report evaluates the obligations related to universal service, accessibility, affordability, and quality of service for deaf people, among others, that Member States should comply with. It further identifies key shortcomings in its implementation and offers recommendations to strengthen the EECC's obligations, ensuring equal access to telecom and internet-based services for all deaf people. As the EU prepares to review the EECC by December 2025, the EUD urges the Commission to address these gaps and enhance accessibility for deaf people in the upcoming revision. Our recommendations aim to ensure the full inclusion of deaf people in the digital communications landscape and promote access to services in national sign languages.

EUD recommends the EU:

- to include explicit provisions that address the broadband needs of deaf people with data usage and video quality requirements ensuring that the use of video calls, relay services and sign language video messages is effective and affordable for any deaf person;
- to ensure that Real-Time Text (RTT) services are natively integrated into devices and networks across all Member States both domestically and while roaming and to monitor its deployment beyond emergency communications;

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- to strengthen the obligations towards Member States in providing Total Conversation services for deaf people, both in emergency communications and in non-emergency contexts;
- to introduce a clear and enforceable obligation within the EECC for Member States to ensure the provision of 24/7 video relay services and to establish harmonised legal and technical frameworks setting common minimum standards and functional requirements of video relay services in the EU;
- to expand the scope of application of Article 96 to national helplines (i.e. suicide helpline, helpline for victims of human trafficking) and EU wide numbers (i.e. emotional support helpline, helpline for victims of violence against women) and ensure their accessibility for deaf people.
- to mandate the BEREC to encourage the development and implementation of Quality of Service (QoS) standards for relay services, including RTT and TC, across all Member States;
- to take immediate action to enforce the implementation of Total Conversation (TC) services in emergency communications, both for the 112 and the national emergency numbers, across all Member States through policy design, monitoring, funding, and support for Member States;
- to accelerate the standardisation of interoperability and roaming for emergency communication apps and networks, ensuring seamless integration of Total Conversation (TC) services across Member States;
- to leverage European funding to extend a Pan-European interoperability framework enabling the widespread implementation of TC services and ensuring that deaf persons can access emergency communications in their national sign languages while roaming;
- to establish clear and unified guidelines for « equivalent access » among Member States, ensuring they guarantee access to 24/7 video relay services, including Total Conversation in National Sign Languages;
- to broaden the formats of public warnings to include videos in national sign languages and ensure that their transmission remains uninterrupted, even in the event of catastrophic network breakdowns or force majeure situations;

EUD recommends Member States:

- to implement broadband policies that recognise the unique communication needs of deaf people, ensuring affordable and high-quality internet access, regardless of income, through specific measures such as fixed-price, all-inclusive packages or reduced tariffs;
- to enforce telecom service providers and companies to accelerate the implementation of native RTT beyond emergency communications into devices and networks;
- to adopt additional measures that enable the use of Total Conversation across a wide range of communications services, beyond just number-based services;
- to mandate national regulatory authorities to enforce telecom providers' universal service obligation to ensure that high quality and reliable video relay services are available 24/7;

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- to address the accessibility of the 116000 Missing Children hotline in close consultation with National Associations of the Deaf (NADs) to ensure its full 24/7 accessibility in National Sign Language for all deaf people;
- to ensure that telecom and internet providers comply with the EECC's requirement to provide information in National Sign Language for deaf persons on their services, tariffs and customer support;
- to leverage the transition to packet-switched technologies in emergency communications to ensure that Public Safety Answering Points (PSAPs) are equipped with video capacity, enabling the implementation of TC services for emergency communications;
- to invest in building the capacity of PSAPs to receive video calls for 112 and other national emergency numbers in national sign languages through infrastructure upgrade, training to operators, and 24/7 national sign language access;
- to enforce telecom providers to comply with specific requirements on equivalent access to their services for deaf people, including the provision of 24/7 video relay services;
- to engage with NADs in the development of emergency preparedness plans and ensure the use of diverse communication platforms to disseminate alerts and critical information in NSL, ensuring every deaf person receives timely and accessible emergency information.

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