



EUROPEAN UNION OF THE DEAF

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

INTRODUCTION

The European Union of the Deaf (EUD), representing deaf people across the European Union through a network of National Associations of the Deaf from 31 countries, welcomes the Digital Networks Act (DNA) Proposal issued by the European Commission on 21 January 2026, aimed at replacing the European Electronic Communications Code (EECC). However, the DNA Proposal does not create new rights for end-users with disabilities compared to the EECC, and its provisions relating to persons with disabilities, including deaf people, remain excessively vague. They continue to leave significant room for interpretation by Member States, which risks perpetuating, rather than remedying, the uneven implementation that characterised the EECC, especially regarding the equivalent access to electronic communications for end-users with disabilities.

In 2025, the EUD published a [report on the implementation of the EECC](#), and submitted its recommendations through to the [Call for Evidence on the DNA](#). The EUD deplores that these were not adequately taken into account, as shared in its [feedback on the DNA Proposal](#) (2026).

Shortcomings in the DNA Proposal

As currently drafted, the DNA Proposal:

- does not introduce any explicit, unconditional obligation to provide Total Conversation services natively, keeping the EECC's conditional “where necessary” approach;
- confines universal service and equivalent access to a fixed location, with no obligation at a non-fixed location, leaving deaf consumers without access to conversational communications at a non-fixed location;
- confines universal service and equivalent access to a fixed location, leaving deaf consumers without the modality that makes their access equivalent precisely when away from home;
- contains no enforceable 24/7 obligation or harmonised minimum standards for relay services, despite most Member States providing them only during limited weekday hours;

- does not extend accessible emergency communications to number-independent interpersonal communications services, through which deaf end-users increasingly communicate, nor beyond '112' to national emergency numbers;
- makes no reference to the accessibility of public warning systems in national sign languages; and
- conflates free access with accessible access for the missing children hotline and other 116 helplines (Art. 111), and gives the EUDI Wallet no accessibility reference for deaf users.

Positive advancements for deaf people

The DNA Proposal does contain positive elements: it references the UNCRPD and European Accessibility Act regarding accessibility for persons with disabilities, incorporates functional equivalence for emergency communications services, and reinforces 112 access while roaming. New Article 106 also reinforces PSAP routing, potentially extending to sign language-equipped PSAPs per Recital 290.

AMENDMENTS

Recital 230:

Proposal for a Digital Networks Act	Proposed amendments
A fundamental requirement of universal service is to ensure that all consumers have access at an affordable price to an adequate internet access and voice communications services at a fixed location. Where there are limitations for access Member States may also consider to ensure affordability of adequate internet access and voice communications services other than at a fixed location, where they consider that this is necessary to ensure consumers' full social and economic participation in society. Particular attention should be paid to ensuring that consumers with disabilities have equivalent access at a fixed location. There should be no limitations on the technical means by which the adequate internet access and voice communications services at a fixed location are provided, allowing for wired or wireless technologies in a technologically neutral way, nor any limitations on which undertakings provide part or all of universal service obligations.	A fundamental requirement of universal service is to ensure that all consumers, including those with disabilities, have equal access at an affordable price to an adequate internet access and voice conversational communications services at a fixed location. Where there are limitations for access Member States may also consider to ensure affordability of adequate internet access and voice communications services other than at a fixed location, where they consider that this is necessary to ensure consumers' full social and economic participation in society. Particular attention should be paid to ensuring that consumers with disabilities have equivalent access at a fixed location and non-fixed location. There should be no limitations on the technical means by which the adequate internet access and voice communications services at a fixed location are provided, allowing for wired or wireless technologies in a technologically neutral way, nor any limitations on which undertakings

	provide part or all of universal service obligations.
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Justification: Universal service must be suitable for all users, including persons with disabilities, on an equal footing with others. Communication is established by means other than voice such as video-based calls which sign language users rely on. Universal service obligations for persons with disabilities should also include the possibility to provide equivalent access at a non-fixed location.

Recital 242: Relay services

Proposal for a Digital Networks Act	Proposed amendments
Relay services refer to services which enable two-way communication between remote end-users of different modes of communication (for example text, sign, speech) by providing conversion between those modes of communication, normally by a human operator. Real time text is defined in accordance with Directive (EU) 2019/882. Where a Member State decides to compensate the undertakings providing basic tariff options or packages, for example when the provision results in unfair financial burden, it should ensure the compatibility of such a measure with the internal market, including competition rules.	Relay services refer to services which enable two-way communication between remote end-users of different modes of communication (for example text, sign, and speech) by providing conversion between those modes of communication, normally by a human operator. Those include text relay services, video relay services and speech-to-speech relay services. Real time text is defined in accordance with Directive (EU) 2019/882. Where a Member State decides to compensate the undertakings providing basic tariff options or packages, for example when the provision results in unfair financial burden, it should ensure the compatibility of such a measure with the internal market, including competition rules.

Justification: Recital 242 currently describes relay services only in generic terms, without identifying the specific service types it covers. Explicitly naming text relay services, video relay services and speech-to-speech relay services ensures consistency with the new definitions proposed in Article 2 and removes any ambiguity as to which services benefit from the obligations set out in Articles 88 and 111.

Recital 292:

Proposal for a Digital Networks Act	Proposed amendments
Member States should take specific measures to ensure that emergency services, including the single European emergency number '112', are equally accessible to end-users with disabilities, in particular deaf, hearing-impaired, speech-	Member States should take specific measures to ensure that emergency services, including the single European emergency number '112', are equally accessible to end-users with disabilities, in particular deaf, hard of hearing hearing-

impaired and deaf-blind end-users and in accordance with Directive (EU) 2019/882. The principle of equivalence implies that end-users with disabilities should be able to access emergency services through emergency communications in a functionally equivalent manner to that in which other end-users access emergency services, in particular by calling the '112' number via voice-based services.	impaired , speech-impaired, and deaf-blind end-users and in accordance with Directive (EU) 2019/882. The principle of equivalence implies that end-users with disabilities should be able to access emergency services through emergency communications in a functionally equivalent manner to that in which other end-users access emergency services, in particular by calling the '112' number and other national emergency numbers via communication voice -based services, including through relay services and total conversation interoperable with networks across the EU.
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Justification: "Hearing-impaired" is a deficit-based term inconsistent with the UNCRPD; "hard of hearing" is the established term. The Act must recognise that communication is established by means other than voice such as video-based calls, which sign language users rely on. Furthermore, accessible access must not end at '112', since many Member States operate national emergency numbers alongside it. Naming relay services and total conversation gives the equivalence principle operative content, and interoperability across Union networks is required for end-users travelling in another Member State.

Article 2 (36) and new (51) to (54): Definitions

Proposal for a Digital Networks Act	Proposed amendments
(36) 'total conversation service' means a multimedia real-time conversation service that provides bidirectional symmetric real-time transfer of motion video, real-time text and voice between users in two or more locations;	(36) 'total conversation service' means a multimedia real-time conversation service that provides bidirectional symmetric real-time transfer of motion video, real-time text and voice between users in two or more locations, enabling deaf and hard-of-hearing users to communicate in real time using sign language. (51new) 'Relay service' is an electronic communication service which enables real-time bidirectional communication between remote end-users of different modes of communication; (52new) 'Real time text' means a form of text conversation in point to point situations or in multipoint conferencing where the text being entered is sent in such a way that the

	communication is perceived by the user as being continuous on a character-by-character basis; (53 new) 'video relay service' means a service that enables communication between sign language users and voice communication users by providing real-time interpretation between sign language and spoken language; (54 new) 'text relay service' means a electronic communications service that enables users of user equipment with RTT capabilities and users of user equipment with voice capabilities to interact by providing conversion between the two communication modalities in substantially real time;
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Justification: The current definition of total conversation service is framed in purely technical terms and does not clarify that its video component is intended to enable communication in sign language. Furthermore, the DNA Proposal repeatedly refers to "relay services" in Articles 88, 104 and 111 and in Recital 242, yet nowhere defines the term or distinguishes between its different forms. This absence of legal certainty risks divergent national interpretations of the scope of the obligation. Introducing precise definitions of relay service, real time text, Video Relay Service and text relay service, aligned with ETSI ES 202 975¹ and the harmonised standard EN 301 549², ensures that the obligations attached to these services can be applied consistently and cannot be narrowed by Member States through interpretation.

Article 88 (4) and new (7): Provision of affordable universal service

Proposal for a Digital Networks Act	Proposed amendments
2. Where Member States establish that, in light of national conditions, retail prices for the services referred to in Article 87(1) are not affordable, because consumers with low income or special social needs are prevented from accessing such services, they shall take measures to ensure affordability for such consumers of adequate internet access service and voice communications services at least at a fixed location.	2. Where Member States establish that, in light of national conditions, retail prices for the services referred to in Article 87(1) are not affordable, because consumers with low income or special social needs are prevented from accessing such services, they shall take measures to ensure affordability for such consumers of adequate internet access service and voice conversational communications

¹ ETSI ES 202 975, "Human Factors (HF); Requirements for relay services."

² ETSI EN 301 549, "Accessibility requirements for ICT products and services."

4. Member States shall provide support, as appropriate, to consumers with disabilities and take other specific measures where appropriate, with a view to ensuring that related terminal equipment and specific equipment and services that enhance equivalent access, including where necessary total conversation services and relay services, are available and affordable.	services at least at a fixed and non-fixed location. 4. Member States shall provide support, as appropriate, to consumers with disabilities and take other specific measures where appropriate, with a view to ensuring that related terminal equipment and specific equipment and services that enhance equivalent access, including where necessary total conversation services and relay services, are continuously available and affordable. (new) 7. By [24 months after the date of entry into force of this Regulation], BEREC shall, after consulting stakeholders, and in close cooperation with the Commission, issue guidelines to support the definition of total conversation services and relay services referred to in paragraph 4 and the specification of the relay services quality requirements necessary for equivalent access of persons with disabilities to electronic communications. The guidelines shall be updated regularly to reflect technological advances and changes in consumer usage patterns.
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Justification: Paragraph 2 should refer to conversational rather than voice communications services, since conversation is equally established through sign language video, and should also extend affordability to a non-fixed location in line with suggested amendment for Recital 230. Article 88(4), as currently drafted, conditions the availability of Total Conversation and relay services on the vague caveat “where necessary”, allowing Member States to opt out of providing them without any burden of proof. Given that most terminal equipment and providers of electronic communications already support video functionality, and given the persistent and well-documented failure of most Member States to provide relay services beyond limited weekday hours, this amendment removes the caveat and requires continuous availability, in line with the equivalence obligation under Article 111 and the universal service obligation under Article 88. The new paragraph 7 mandates BEREC to issue guidelines, including updated quality requirements building on standards such as ETSI ES 202 975, so as to prevent divergent interpretation by Member States and competent authorities.

Article 104: Missing children hotline ‘116000’

Proposal for a Digital Networks Act	Proposed amendments
1. Providers of number-based interpersonal communications services shall ensure free of	1. Providers of number-based interpersonal communications services shall ensure free of

charge access for end-users, including end-users with disabilities, to the service operating a hotline to report cases of missing children. When travelling within the Union, end-users shall have free of charge access to the visited country's service. The hotline shall be available on the number '116000'. 2. Member States shall take appropriate measures to ensure that the authority or undertaking to which the number '116000' has been assigned allocates the necessary resources to operate the hotline. 3. Member States and the Commission shall ensure that end-users are adequately informed of the existence and use of services provided under the numbers '116000' and, where appropriate, '116111'.	charge access for end-users, including end-users with disabilities, to the service operating a hotline to report cases of missing children, including through total conversation and relay services. When travelling within the Union, end-users shall have free of charge access to the visited country's service. The hotline shall be available on the number '116000'. 2. Member States shall take appropriate measures to ensure that the authority or undertaking to which the number '116000' has been assigned allocates the necessary resources to operate the hotline. Member States shall ensure that the authority or undertaking operating the hotline guarantees accessible means of communication for end-users with disabilities, including through total conversation services and relay services, in compliance with Directive (EU) 2019/882. 3. Member States and the Commission shall ensure that end-users are adequately informed, in accessible formats and in compliance with Directive (EU) 2019/882, of the existence and use of services provided under the numbers '116000' and, where appropriate, '116111'.
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Justification: The DNA Proposal, in its current form, only guarantees free access to the missing children hotline for persons with disabilities, which is insufficient. Free access does not equate to accessible access: a service that cannot be reached in national sign language, or only through a relay service that is itself unavailable outside business hours, remains in practice inaccessible to deaf people, particularly in urgent situations such as reporting a missing child. This amendment requires that these services be reachable through Total Conversation and relay services, and that end-users be informed of their existence in accessible formats.

Article 106 (2) and (8): Emergency communications and European Digital Identity Wallet

Proposal for a Digital Networks Act	Proposed amendments
1. Member States may mandate access to emergency services through emergency communication from number-independent interpersonal communications services as long as the national PSAP system allows for routing to	1. The European Commission may mandate access to emergency services through emergency communication from number-independent interpersonal communications services as long as the national PSAP system

the most appropriate PSAP and receipt of caller location information.

2. No later than 24 months after the adoption of the delegated act referred to in paragraph 8, Member States shall ensure that end-users can originate emergency communication by means of a mobile application coupled with the European Digital Identity Wallets issued under Regulation (EU) 910/2014.

5. Providers referred to in paragraph 1 shall ensure that access for end-users with disabilities to emergency services is available through emergency communication and is equivalent to that enjoyed by other end-users, including by complying with Directive (EU) 2019/882.

When mandating means of access to emergency services through emergency communication for end-users with disabilities, Member States shall ensure that, subject to technical feasibility, the following functional equivalence requirements are met:

(a) emergency communication enables two-way interactive communication between the end-user with disabilities and the PSAP;

8. The Commission may adopt delegated acts in accordance with Article 198 supplementing paragraphs 1, 2, 3, 5 and 6 of this Article by laying down the measures necessary to ensure effective emergency communication in the

allows for routing to the most appropriate PSAP and receipt of caller location information. **In order to provide access to the single European emergency number 112, number-independent interpersonal emergency communications shall comply with the accessibility requirements laid down in Annex I of Directive (EU) 2019/882.**

2. No later than 24 months after the adoption of the delegated act referred to in paragraph 8, Member States shall ensure that end-users, **including end-users with disabilities**, can originate emergency communication by means of **an accessible** mobile application coupled with the European Digital Identity Wallets issued under Regulation (EU) 910/2014, **in compliance with Directive (EU) 2019/882.**

5. Providers referred to in paragraph 1 shall ensure that **access to emergency services available to end-users through emergency communication is equivalent for end users with disabilities, including by complying with Directive (EU) 2019/882.**

When mandating means of access to emergency services through emergency communication, ~~for end-users with disabilities~~, Member States shall ensure that, **subject to technical feasibility**, the following functional equivalence requirements are met **in order to be equivalent for persons with disabilities:**

(a) emergency communication enables two-way interactive communication between the end-user with disabilities and the PSAP; **including through Total Conversation and the availability of relay services 24 hours a day and on any calendar day.**

8. The Commission may adopt delegated acts in accordance with Article 198 supplementing paragraphs 1, 2, 3, 5 and 6 of this Article by laying down the measures necessary to ensure effective emergency communication in the Union with regard to technical specifications to allow the origination of emergency

Union with regard to technical specifications to allow the origination of emergency communication by means of a mobile application coupled with the European Digital Identity Wallets, caller location information solutions, harmonised European caller location criteria, equivalent access for end-users with disabilities and routing to the most appropriate PSAP.	communication by means of a mobile application coupled with the European Digital Identity Wallets, caller location information solutions, harmonised European caller location criteria, equivalent access for end-users with disabilities, including through total conversation and relay services , and routing to the most appropriate PSAP.
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Justification: Accessible access to emergency communications must equally cover number-independent interpersonal communications services, through which deaf end-users increasingly communicate, and include total conversation and relay services available 24 hours a day and on any calendar day as means of reaching emergency services. The DNA Proposal envisages the use of the EUDI Wallet, issued under Regulation (EU) 910/2014, as an additional channel for originating emergency communications, without any reference to its accessibility for deaf users or other persons with disabilities. This amendment requires that the Wallet and its coupled mobile application comply with the European Accessibility Act, so that this new channel does not create barriers where none previously existed.

Article 107: Public warnings

Proposal for a Digital Networks Act	Proposed amendments
1. Providers of mobile number-based interpersonal communications services shall transmit public warnings to the end-users concerned, via the technology mandated by the Member States where they provide the service, in the geographic areas potentially being affected by imminent or developing major emergencies and disasters during the warning period, as determined by the competent authorities. 2. The Commission may adopt implementing acts laying down technical provisions concerning the transmission of public warnings by means of	1. Providers of mobile number-based interpersonal communications services shall transmit public warnings to the end-users concerned via the technology mandated by the Member States where they provide the service, in the geographic areas potentially being affected by imminent or developing major emergencies and disasters during the warning period, as determined by the competent authorities. Member States shall take appropriate measures to ensure that public warnings are accessible to end-users with disabilities, including through accessible terminal equipment and the provision of warning videos in sign language. 2. The Commission may adopt implementing acts laying down technical provisions concerning the transmission and accessibility of public warnings by means of a mobile application coupled with the European Digital Identity

a mobile application coupled with the European Digital Identity Wallets issued under Regulation (EU) 910/2014 to all end-users concerned, including roaming end-users. Those implementing acts shall be adopted in accordance with the procedure referred to in Article 199(3). 3. Member States shall ensure that one year after the first implementing act adopted under paragraph 3 of this Article, public warnings are also transmitted to all end-users concerned by means of a mobile application coupled with the European Digital Identity Wallets issued pursuant to Regulation (EU) 910/2014.	Wallets issued under Regulation (EU) 910/2014 to all end-users concerned, including roaming end-users and end-users with disabilities. Those implementing acts shall be adopted in accordance with the procedure referred to in Article 199(3). 3. Member States shall ensure that one year after the first implementing act adopted under paragraph 3 of this Article, public warnings are also transmitted to all end-users, including end-users with disabilities, concerned by means of a mobile application coupled with the European Digital Identity Wallets issued pursuant to Regulation (EU) 910/2014.
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Justification: The DNA Proposal makes no reference to the accessibility of public warning systems in national sign languages, leaving deaf people, who cannot access audio-based or text-only alerts, without any guaranteed access to life-saving information in emergency situations. This amendment requires Member States to ensure that public warnings are accessible, including through sign language video formats, and extends this obligation to the mobile application coupled with the EUDI Wallet, ensuring that deaf people are not excluded from life-critical information regardless of the channel used to transmit it.

Article 111: Equivalent access and choice for end-users with disabilities

Proposal for a Digital Networks Act	Proposed amendments
1. Providers of publicly available electronic communications services shall ensure that end-users with disabilities: (a) have access to electronic communications services, including the related contractual information provided pursuant to Article 95, equivalent to that enjoyed by the majority of end-users; 2. In taking the measures referred to in paragraph 1 of this Article, competent authorities shall encourage compliance with the	1. Providers of publicly available electronic communications services shall ensure that end-users with disabilities: (a) have access to electronic communications services, including the related contractual information provided pursuant to Article 95, equivalent to that enjoyed by the majority of end-users, including access to relay services 24 hours a day and on any calendar day for users with disabilities; 2. In taking the measures referred to in paragraph 1 of this Article, competent authorities shall encourage compliance with the

relevant standards or specifications laid down in accordance with Article 187.	relevant standards or specifications laid down in accordance with Article 187. (new) 3. Member States shall ensure that relay services are provided free of charge to end-users who are deaf, hard-of-hearing or with speech disabilities, and that providers of such services receive adequate and sustainable compensation for their net costs.
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Justification: The equivalence obligation in Article 111 does not explicitly reference relay services, leaving room for Member States to consider more limited measures sufficient. This amendment makes explicit that equivalent access includes uninterrupted provision of relay services. The new paragraph 3 further ensures that relay services are provided free of charge to deaf, hard-of-hearing and speech-disabled end-users, while providers receive adequate and sustainable compensation for their net costs, in line with Recital 28 of the European Accessibility Act, which recognises that Member States should be able to determine the relay service provider used by persons with disabilities.