

PSCE comments to BEREC guidelines on how to assess the efficiency of public warning systems transmitted by different means

Brussels, 31 January 2020

Public Safety Communication Europe is a permanent autonomous organisation, working to foster excellence in the development and use of public safety communication and information management systems by consensus building and bringing together public safety user organisations, industry and research institutes.

In order to provide comments on the draft guidelines, PSCE has consulted national public authorities in charge of delivering public warning messages to their population. Moreover, during 2019, PSCE has organised three dedicated workshops on the implementation of article 110 of the European Electronic Communication Code (EEC) in cooperation with the national authorities of Belgium, Finland and France, gathering the views of the practitioners coming from all EU countries.

The following 3 sections A) to C) provide our specific feedback.

A) Comments on the methodology

As provided for in the EEC article, equivalence must be assessed on the basis of the criteria relating to the coverage and the ability to reach end users, including those only temporarily present in the concerned area (inbound roamers).

It appears that the methodology followed by BEREC while taking up the two criteria provided for in the legislation does not succeed in giving sufficient indicators on criterion n ° 1 "geographic coverage", leaving to the Member States a considerable margin of appreciation whereas this criterion is essential.

Taking into account the operational needs of public security services, it is important to aim for the highest possible geographic coverage without taking into account the national specificities of communication networks. Rural areas must benefit from a significant level of coverage due to the often-long delays in the delivery of civil protection services.

National authorities wish to obtain the highest possible coverage and populations cannot be satisfied with insufficient coverage in certain areas of the territory.

In addition, the indicators developed by BEREC are based on an initial consultation initiated in the summer of 2019 open to all stakeholders (public authorities and private operators). A systematic approach of the competent national authorities was not conducted to obtain the necessary data on the national systems in place and their characteristics, as well as their performance on coverage and the capacity to reach recipients. The evaluation criteria derived from information collected on national systems seem incomplete and / or imperfect. The preparation of these guidelines must be done based on reliable, solid and complete data.

It should also be noted that the LBSMS and CB systems are constantly evolving and that many Member States are choosing a hybrid solution combining the characteristics of the two solutions to obtain improved results. Therefore, it seems legitimate to consider if or how these guidelines based on technological criteria, will be updated because the benchmark carried by Member States will be rapidly based on outdated data.

In addition, new comparison criteria although relevant, are added to those provided for by the European legislator which could distort the analysis of the technical options available (mainly display capabilities and support to absent residents).

B) Answers to the specific questions

- **Question 1:** *What are the minimum operational requirements that you would expect from a public warning system operator with regard to the criteria of coverage and capacity to reach end-users? In particular, what are your expectations with regard to targeting concerned end-users in a specific geographical area (required minimum geographical granularity)?*

Geofencing is a desirable feature which is technically feasible.

In large cities, sending warning messages to the only affected persons is essential to avoid panics or counter-productive reactions.

- **Question 2:** *In your experience, what is the ratio (in percentage) of the number of events that trigger a public warning message that can be assigned to each of the following size of targeted area?*
 - targeted area with population up to 5 000; 98%
 - targeted area with population up to 50 000; 98%
 - targeted area with population up to 500 000; 95%
 - targeted area with population up to 2 million; 95 %
 - targeted area with population up to 10 million; very unrealistic situation
 - targeted area with population above 10 million. Very unrealistic situation
- **Question 3:** *If your Member State has already rolled out a public warning system using means of electronic communications services (ECS-PWS), how well does it meet your*

expectations in terms of geographical coverage, population coverage and overall capacity to reach end-users?

As PSCE is not a national authority having rolled out an ECS-PWS, this question cannot be answered directly. However, it should be noted that countries which have an ECS-PWS are not in a static situation. New features are being constantly developed, sometimes hybrid solutions are chosen in order to maximize the performances of an ECS-PWS taking the best of the available solutions on the market.

C) Features of a PWS

Here are a few characteristics of a PWS which are based on non-technical criteria:

- ✓ The PWS reaches the right people at the right time
- ✓ The PWS is reaching anyone in the affected zone (citizens and also visitors)
- ✓ The PWS system must monitor which messages were delivered and resend the message when first attempts failed.
- ✓ Authorities should receive confirmation that the alert was appropriately disseminated
- ✓ The PWS delivers messages with a sufficient level of granularity to enable the sending of targeted alerts to specific defined areas.
- ✓ As a matter of confidence, the PWS should be secure enough to prevent any risk of fake alerts.